



AEF response to DfT draft HENPS consultation, September 2026

1. To what extent do you agree or disagree with the assessment of the need for the proposed expansion of Heathrow Airport? Explain your answer.

We do not agree with the assessment of the need for a third runway. Throughout the sections of the HENPS which deal with the need case, many of the justifications appear flimsy and not backed up by evidence. Most of the reasons given are simply statements that increased airport capacity automatically generates growth, without any factual evidence to support this assertion. Some arguments also appear contradictory: the need case implies the UK is suffering from a terminal lack of airport infrastructure, yet simultaneously states that 'London serves more airport destinations with regular passenger services than any other city in Europe.'

Arguments for 'need' and 'growth' should be distinguished from each other. From a capacity perspective, the accompanying 2026 forecasts do not demonstrate an urgent need for additional capacity. The HENPS dataset shows, based on the current trends scenario, that total UK passengers in 2040 are forecast to be 408 million with a third runway and 403 million if a two-runway Heathrow is maintained, only a 1.2% difference. For 2045, the forecasts show 448m and 442m respectively, a 1.3% difference. The gap only starts to widen from around 2050 onwards.

Regarding growth, there is nothing to explain how more people flying abroad on holiday contributes to economic growth - the UK has a mature aviation market, with most passengers now travelling for leisure. Even at Heathrow airport, only about 18% of passengers are travelling for business, and that figure has been on a steady downward trajectory since 2008. We do not see evidence in the HENPS of how facilitating more people to leave the country and spend money abroad is good for growth in the UK while the UK domestic tourism industry is struggling - the current tourism deficit is approximately £46bn¹. As observed in the Frontier Economics report for the DfT, *"the effects of capacity expansion are more pronounced for the outbound travel of UK residents than they are for the inbound travel of foreign visitors; and that outbound spending is several times the magnitude of inbound spending under both baseline and expansion cases"*

¹ <https://www.ons.gov.uk/peoplepopulationandcommunity/leisureandtourism/articles/traveltrends/2024>

Meanwhile, according to data from Visit Britain, total annual day trips and overnight stays have fallen annually since 2022 as shown in the table below. While there has been an increase in the value of domestic tourism, Visit Britain attributes this in part to inflation.

Data (Visit Britain, 2026)	2022	2023	2024	2025
Total GB day trips (million)	123.5	117.4	105.6	103.0
Total GB overnight stays (million)	375.2	340.2	307.5	301.2

While there is some merit in the argument that facilitating trade and connectivity as a whole can be beneficial to an economy, there is no justification in the HENPS of why this needs to occur at Heathrow and not other key UK airports. This is particularly problematic because the push for expansion at Heathrow is taking place in the context of 5 other London airports, and several other regional airports, having been given permission to expand. The expansions granted at Stansted, Luton, Gatwick, London City and Bristol in the last few years total around 63m extra passengers per year (with the majority directly serving London and the South East) - this does not appear to have been factored into the demand case for Heathrow and significantly changes the 'need' situation considered by the Airports Commission and the ANPS. In fact, the evidence shows that if Heathrow goes ahead it will affect projected total demand and the rate of growth at many airports. For example, Gatwick in 2040 has over 6m fewer passengers than predicted if Heathrow doesn't expand, Luton has 7.5m fewer passengers in 2045, and London City and Birmingham have over 4m and 7.5m fewer passengers respectively in 2050. This undermines the need case previously accepted by the Government when approving expansion applications at Gatwick, Luton and London City.

The conclusion that the main beneficiaries of expansion will be consumers (ie. passengers) needs to be set in context. At least 40% of people do not fly at all in any given year in the UK, and the government's own figures suggest that about 70% of passengers do not use Heathrow Airport. This is a social justice question, delivering more benefit for higher-income consumers who wish to travel for leisure purposes. We do not believe that a need case for the third runway can be constructed by simply talking in general terms about why people want to fly - especially when the substantial environmental, social, health and community costs of this are overlooked in the presentation of the economic case in the draft HENPS.

There is no explanation as to why defending Heathrow's hub status and competitive position with regards to other hub airports such as Dubai and Frankfurt would benefit anyone other than Heathrow's foreign-owned shareholders. The world and geography of aviation is changing regardless of UK policy, with dominant hubs emerging in Turkey and the Middle-east. There is little justification in the HENPS why Heathrow's hub status has to be protected, and what this will do to promote equitable national growth in the UK, as it actively encourages people to simply fly into London, possibly to spend money in the airport, and then leave again. The HENPS invokes the importance of offering choice and competitive benefits to consumers by airlines being able to choose the best routes, but ignores the fact that Heathrow is currently one

of the most expensive airports in the world for passengers to use, and its regulated asset base model allows it to operate as a quasi-monopoly. Throughout the need case there is a lack of detailed data and analysis to justify expansion, for example, statements such as: 'without expansion, passengers are likely to suffer from higher fares'. This is ironic given that the costs of expansion will largely be borne by passengers as higher landing and passenger charges are used to recoup the investment (a warning made loud and clear by several of Heathrow's UK airline customers)

2. The government has proposed four tests which must be met for expansion to proceed. To what extent do you agree or disagree with how the government has set each of the 'four tests'? Explain your answer for each test:

Our specific comments on the four tests are set out below. But we have an overarching concern about the information provided in the Appraisal of Sustainability (AoS) to illustrate how the project is likely to perform against these tests. The information in the AoS is based on forecast passenger and traffic growth at Heathrow as set out in the accompanying datasets, and is strongly influenced by the timing of the phased introduction of terminal capacity in 2038 (when total Heathrow capacity is assumed to increase from 96mppa to 116mppa) and 2049 (when it increases again to 150mppa). The forecasts assume only modest increases in passengers at the airport between now and 2049, with the majority of additional capacity being utilised from 2050 onwards. This is in stark contrast to the Airports Commission work, and the DfT's 2017 aviation forecasts, which assumed that additional capacity at Heathrow would fill up quickly after the infrastructure was completed. The new forecasts reflect a changing market and global economic performance since 2018, and we have no reason to dispute the results, but it does highlight the importance of **when** phased capacity is added at Heathrow. For example, on the climate test, the 2038 date for additional terminal capacity to come online is at the end of CB6. If this capacity became available two years earlier for instance, it would likely impact negatively on the carbon budget 6 assessment. Similarly, significant terminal capacity would be added again at Heathrow in 2049, a year before the net zero target. Between 2049 and 2054, CO₂ emissions at Heathrow would explode by 16.5% (over 3MtCO₂) as a result of the additional terminal capacity, according to DfT forecasts. If this phase of Heathrow development came onstream earlier, say in 2045, it would have a material impact on decarbonisation goals for the sector, and the UK's ability to meet its legal obligations on emissions reductions. It is notable that the assumed timing of these step changes in capacity pushes some of the associated higher forecast environmental impacts beyond the timescale of Government goals and targets, especially in relation to climate commitments for the sector.

Additionally, it appears from the wording of the HENPS that the timing of new terminal capacity is a working assumption, and we can find no firm requirements that would prevent the scheme promoter from applying for permission at an earlier date, potentially changing the results of the AoS.

- Air quality

We disagree with the decision to only assess the air quality impacts of the scheme against the UK's legal limits. It is widely accepted by the health and scientific community that these limits are insufficient to protect communities from dangerous health impacts, and many groups and health-based charities have been campaigning for years for these limits to be changed. We believe that a scheme of this size, with potential to increase harmful emissions of pollutants such as NO₂ and PM_{2.5} from traffic and increased aircraft movements, must be tested against the latest science. The EU has adopted the World Health Organisation interim targets by 2030, and the WHO guidelines themselves recommend *four times* less NO₂ than is currently legal in the UK. We believe that the HENPS should set clear rules to prevent environmental and health harms, yet the approach taken is to allow more flights (and commercial gain to a wholly foreign-owned commercial entity) to take advantage of the reductions secured by other air quality policies in recent years which have nothing to do with the airport or expansion. By effectively allowing the ambient NO₂ and PM_{2.5} levels to creep back up to just below these widely discredited legal limit values, the draft HENPS is denying the health benefits of those developments - being realised today - to local people and future generations. In addition, communities experience air pollution, noise, climate impacts, and construction disruption in combination, not in isolation. Those already experiencing poorer health already face compounded and mutually reinforcing harms.

Disappointingly, there is no requirement for the scheme promoter to monitor or mitigate ultra fine particle emissions (UFPs), despite a growing body of evidence linking them to health impacts², and knowledge that aeroplanes are a major source of UFPs (in part because of a failure to hydrotreat kerosene). In addition, there is no requirement to assess the interaction of increased emissions of volatile organic compounds (VOCs) and NO₂ at the airport, despite there being known associations with localised ozone formation incidents in West London.

While the Government's requirements on the scheme promoter to demonstrate that the elements under its direct control, such as airside vehicles, emissions from auxiliary power etc, are mitigated seem adequate, there is very little to satisfactorily mitigate the impact of rising emissions of NO_x from planes. These are known to be increasing as aircraft become larger and due to manufacturers giving priority to making CO₂ reductions (a known trade-off), but there is no enforceable requirement in the HENPS for the scheme promoter to mitigate this impact. Recent DEFRA figures show that NO_x emissions from aircraft in the LTO phase rose 10% from 2023-24³, while NO_x from other transport sources such as road traffic is falling. The document suggests that landing charges could be used to incentivise aircraft with fewer NO₂ emissions, but this could contradict using landing charges to incentivise lower CO₂. Aircraft standards are agreed at ICAO, where the UK Government has influence in international negotiations but cannot unilaterally determine what new technologies are promoted. While we recognise a scheme promoter has limited levers over this issue, it does not remove the very real health

² <https://www.aef.org.uk/2026/04/15/briefing-ultra-fine-particles-from-aviation/>

³

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F6a678cb4dbf59f1cdb362302%2FENV0301.ods&wdOrigin=BROWSELINK>

dangers associated with increasing NO₂ emissions, and we believe that the Government should be ultimately responsible for reducing harms to public health. We do not believe that the proposed mitigations in the HENPS do enough to protect communities, children and the vulnerable from the health harms of air pollution.

The bulk of the air pollution impact from the scheme comes from the massive daily increase in vehicle journeys to the airport - however, we are baffled as to why there has been no revised modelling on how many vehicles are expected. There is simply no figure anywhere in the draft HENPS to give an indication of the scale of the impacts which will come from the scheme, giving the impression that this is an indirect effect of the plans. We are grateful to TfL for carrying out this modelling, which suggests that even if the proposed mode share targets are met, there will still be around 60,000 extra vehicle trips⁴ to the airport every day. We do not believe what has been proposed in the surface access section is adequate to address these impacts (see below).

- Noise

We do not believe that the information supplied in the noise section of the HENPS is adequate to allow the public to make an informed response to the consultation, nor is it adequate to guide planning inspectors in the event of a DCO. We believe the use of indicative flightpaths, especially those designed over ten years ago for the Airports Commission, is not good enough for communities who want certainty when they are responding to this consultation about whether they will face an increase or change in their exposure to aircraft noise. Planning inspectors will also be in the dark about the precise impacts of the scheme given the ongoing airspace modernisation programme. It is not logical or fair to push this proposal forward before there is an agreement about flightpaths and the associated impacts. This should be a material consideration to determine how the impacts of noise will actually accrue to real people in the real world. In contrast, the Government has previously run roadshows in local areas to highlight the plans, yet we see nothing of the kind this time round. The Appraisal of Sustainability suggests that up to 3.4m people will be affected by an expanded airport at 43 LAeq, yet the majority will largely be unaware of it. The need to engage the public on noise in an open and transparent manner, is even more important given the recent ANAS and ANNE findings.

The noise test in itself is vague and arbitrary. There is no justification for why a 2024 baseline has been chosen over any other baseline. There is no statement of what an “acceptable” level of noise is, or commitment to ensure that communities benefit from the expected reduction in noise over the next 20 years due to the introduction of quieter aircraft. Like the air quality test, this test appears to take advantage of any headroom created by a future quieter fleet and operational practices to argue that things will be no worse than they were in 2024. This approach erodes the health-based benefits of existing efforts and commitments to reduce noise for local populations who have long suffered under Heathrow flightpaths.

⁴ <https://committees.parliament.uk/writtenevidence/168310/html/>

The modelling predicts fewer people impacted in 2055 compared to 2024 levels, but this is a full 20 years after the airport is expected to open. What this means in practice is that any gain that could come from the introduction of quieter planes to communities bedevilled by aircraft noise in the next decade, will now be offset by more flights. There does not appear to be anything in the HENPS to protect communities before 2055.

We have serious concerns that noise policy has not been updated according to the latest scientific evidence, and therefore the scheme will be assessed using outdated targets which won't protect human health. Just before the HENPS was published, the Department for Transport and the Civil Aviation Authority released the long-awaited ANAS and ANNE noise studies. These surveys of public reaction to daytime and night time aircraft noise exposure, published by the CAA and DfT respectively, show unequivocally that the UK public is highly annoyed at much lower levels than previously reflected in Government policy (43 dB LAeq) and correlates closely with the WHO's recommendations on aircraft noise exposure. We are disappointed that the results of the ANAS/ANNE noise studies have not been fully reflected in the draft HENPS. We are aware that the studies were finished nine months before the draft HENPS was published, and it is reasonable to expect that they should have been incorporated fully into the noise appraisal. Instead, the reports are acknowledged only in a sensitivity test while noting that "Government aviation noise policy has yet to be reviewed in light of the newly published evidence". Given enormous numbers of people affected by noise from Heathrow compared to any other airport in the country, or indeed in Europe, it seems premature and unfair to push forward the draft HENPS without bringing noise policy up to date to reflect the latest science first.

The results of the sensitivity tests are hugely significant, showing a four-fold increase in the area affected. By 2055, under the 3R scenario, the 43 dB LAeq contour is estimated to include 3,405,000 individuals and 1,495,000 households, representing a 33% increase compared with a two-runway airport. It is noted that this is less than the comparable 2024 estimate of 4,650,000 people and 1,876,000 households, but this further highlights that much of the benefit assumed to come from quieter aircraft in the future will be eroded by the scheme, while many people will be overflown for the first time. In total, the CAA's modelling shows that 825,000 more people will be affected by aircraft noise during the day at 43 dB LAeq in 2055 (than would have been the case if the runway did not go ahead), and 167,000 more people at night.

We do not believe that the Webtag assessment in the economic appraisal provided a monetised cost for the now approximately 3.4m people exposed to 43dB Leq 16-hour. If these numbers had been used to fully reflect the environmental costs of the scheme, the NPV of the scheme would have been even lower than the shockingly negative figure already identified.

Trust is an important factor in determining reaction to aircraft noise. Similar commitments to reduce noise have been made in the past, including on nightflights and the provision of effective noise insulation. For many in local communities, these promises have been eroded or broken, and we are not sufficiently convinced from the wording of the HENPS that the night

flight ban, the requirement to pay for quality insulation, or the guarantee of respite in the future, will be legally binding and stand the test of time.

Finally, no assessment has been provided of cumulative noise effects from other aviation activity in the London area. For example, residents in south London are regularly exposed to noise from aircraft arriving into Heathrow and London City airports.

- **Climate change mitigation**

The HENPS falls back on the same inadequate climate test as was included in the 2018 ANPS, effectively assuming that *national* aviation policy *will* guarantee that emissions from aviation are reduced in line with our legal climate tests; effectively a test whose result the Secretary of State can decide by fiat. This effectively absolves the scheme promoter of having to prove that the large increase in emissions caused by its proposed project will not jeopardise the UK's climate commitments, and takes power away from planning inspectors from assessing the question for themselves. Put simply, If the airport did not go ahead, there would be no need to mitigate the enormous impact of the emissions from the planes in flight. The ambiguity of the "material impact" test continues, despite it having caused significant headaches in previous DCO applications - and there is still no Government quantification for what a material impact on our ability to meet climate obligations is.

The legal obligation to meet climate budgets rests with another government department, DESNZ, and it is difficult to see how its Secretary of State can possibly grasp the full detail and (obfuscation) of the project. The project climate impact is neatly divided into a small, managed increase in flight numbers during CB6 and CB7, constrained by the development of terminal capacity, but it then explodes after 2050 (and represents some 97% of the climate impact of the project). The fact that there is no current target or legal obligation on the Government to reduce emissions after 2050 leads to suspicions that this is the only way anyone could possibly argue that the expected additional 3Mt per year of extra emissions from the project after 2050 would not "materially impact" our legal obligations. Furthermore, there is no guarantee anywhere in the HENPS that this so-called "staged" development will be controlled, or occur at on the same timescales as today's modelling assumes, or that the "explosion" in emissions which conveniently occurs after the UK's carbon budgets currently finish will actually be delayed until 2050 - once an expanded Heathrow opens there does not seem to be anything in the HENPS that prevents flights from relocating from other airports, or anything to prevent the new runway from filling up with new flights much faster than today's modelling contrives.

This is all the more disappointing when read alongside the latest aviation CO2 forecasts which show unequivocally that the projections of the Jet Zero strategy, which were just a few months ago invoked to defend against a legal challenge into the climate impacts of expanding Gatwick Airport, are now effectively acknowledged to be a fantasy. It is disappointing to see that the planned Jet Zero Strategy review and modelling won't be complete until 2027, too late for them to be incorporated into the final wording of the draft HENPS based on current timetables.

We are disappointed that despite considerable scientific progress in understanding the impact of additional warming from contrails, the Government has required nothing more than a vaguely-defined “qualitative assessment” of non-CO2 emissions. This is particularly problematic as Heathrow is responsible for a much larger share of transatlantic flights than other airports, which are known to generate a large proportion of heating contrails.

Although the 2026 aviation forecasts are undoubtedly a more honest assessment of the parlous state of aviation decarbonisation, and an acknowledgement that the techno-optimism of the 2022 Jet Zero Strategy must be tempered with a good dose of realism, the fundamental framework of decision-making for the Secretary of State remains intact from the 2018 ANPS. It absolves the SoS Transport of any real responsibility for the failures of policy to deliver the sectoral cuts in emissions necessary for us to meet our legislated carbon budgets, and merely requires their adequacy, or lack thereof, to be assessed against the whole economy trajectory (set by the SoS for Energy Security and Net Zero in a separate process of drawing up carbon budget delivery plans every 5 years). It also absolves the scheme promoter of any responsibility to ensure that UK aviation emissions are on a downward trajectory, while simultaneously inviting them to pursue a project that will send them in the opposite direction. With a project of this scale and size, it seems irrational to not present more rigorous restrictions and limits on the amount of carbon emissions from the project at the DCO stage, rather than a wing and a prayer that forecasts more than 10 years into the future actually turn out to be correct.

- **Economic growth across the country**

The framework for decision making on the test on economic growth across the country is brief and lacking in detail. This is a surprise given that it is the only real justification given for why this project should be supported. Given the dire results of the economic assessment presented in the government’s own Appraisal of Sustainability, we would expect the scheme promoter to struggle to demonstrate that there will be any impact at all on the UK’s wider regions. The AoS showed that the project would not be able to generate more than a 0.05% boost to GDP, and this would not be fully realised until 20 years after the runway opens (2056). This exceptionally poor result derived from a S-CGE assessment, the very tool the HENPS recommends should be used to capture wider benefits. Moreover, this assessment, carried out by Frontier Economics, shows that under several different scenarios, the benefit to any of the UK’s regions outside London is less than 0.03%. In contrast, it is consistently 0.17% and above in London.

Given these underwhelming results, we would expect the draft HENPS to require promoters to show explicitly how new jobs and investment will be created in the regions, rather than simply relocating jobs from the regions to London. We would also expect more detail on a) how regional routes to Heathrow will be guaranteed and paid for, and how these would support regional businesses b) credible reasons why regional businesses would choose to use Heathrow over other more conveniently located airports such as Manchester and c) an analysis of what wider economic impact that a redistribution of passengers and routes (from other airports to Heathrow) will have on jobs and regional economies. The Government’s

accompanying forecasts and AoS shows that for the first 20 years of operation, the growth at Heathrow comes at the expense of other UK airports. For example, Birmingham's passenger numbers are forecast to be 7.5m lower in 2050 if a third runway opens, a 22% fall. The HENPS also admits that it is not clear whether any of the 60,000 jobs promised as a result of the expansion will be **new** jobs, or simply jobs being relocated from the "less productive" regions to the South-East. We would therefore expect a requirement on the scheme promoter to demonstrate clearly how the project will actively *protect* jobs and connectivity in the UK's regions.

In a financially constrained world, with a skills shortage and a long list of other crucial infrastructure projects, we would argue that the Government should assess the "opportunity costs" of a 3rd runway scheme measured against other possible uses of that construction and investment capacity - even if Heathrow is a private sector project - to drive regional economic growth. For example, how does its overall utility and growth potential perform against alternative large-scale infrastructure projects such as Northern Powerhouse Rail, and where those investment choices could be in competition for construction jobs. The Government's own peer reviewer of the economic case for growth specifically highlighted that 88% of the GDP impact of the project is due to expenditure on construction, which could of course be used on national projects which benefit everyone, and not just a narrow section of the population who want to fly more.

3. To what extent do you agree or disagree that the proposed mitigation measures for environmental impacts resulting from Heathrow expansion requirements are deliverable, effective and proportionate? Explain your answer.

Throughout the draft HENPS document, there is a pattern of recognition of the enormous environmental and social harms that expansion will cause, and we see welcome suggestions of how these harms may be mitigated, but we also see inadequate proposals for how any protections for communities will actually be enforced. For example, the modelling suggests that noise will eventually reduce by 2055, that respite will continue and that a night flight ban will be enacted, but there is no detail regarding how planning conditions might work, or retrospective enforcement measures introduced, to ensure that these warm-sounding protections do not evaporate. We see a requirement that the expansion will not cause breaches of the legal limits for exposure to dangerous air pollutants such as NO₂, but we see nothing to actively protect the health of West Londoners and Berkshire from air pollution - as we have noted elsewhere, the approach appears to be enabling more flights by taking advantage of impressive reductions in ambient levels of air pollution in recent years. These benefits should, and already are, accruing to the health of local communities, and it is disappointing that they are being used to create headroom to justify the airport expansion that will make things worse again. Most of the prospective enforcement measures in the HENPS will be delegated to the DCO process, when planning inspectors will be extremely busy, and as we saw in the Gatwick and Luton decisions, potentially over-ruled. We do not see enough assurances or mechanisms in this HENPS to

guarantee that if environmental, health and social harms occur, there will be a robust process which will allow communities to seek redress or reverse them.

The air pollution and noise tests only appear deliverable because they are based on out-of-date limits on exposure to pollutants and noise which offer very little actual protection to people's health. The World Health Organisation has very clear, scientifically supported recommendations about the limits on both noise and air pollution which would actually protect health, but these are ignored in the draft HENPS. At the same time, both tests are based on indicative flight paths, meaning residents are unable to make meaningful judgements about how they will be impacted and the effectiveness of mitigation measures.

The proposed mitigation on climate is not effective because the DfT's own forecasts show that national aviation decarbonisation policy is not delivering reductions in aviation emissions fast enough, especially to offset a massive increase in emissions from a third runway. The HENPS, as written, would greenlight a huge increase in harmful carbon emissions, but largely relies on a suite of policies delivering across a wide range of economic sectors, none of which are really in the control of relevant decision-makers. The proposed mitigation is therefore ineffective, because there is no enforcement measure granted to the DfT. In particular, AEF is vexed by the confection of a so-called "staged delivery" strategy, where the timing of the delivery of the new runway, terminal capacity, and therefore the huge increase in flights is somehow perfectly controlled to allow the conclusion that no significant emissions increases will occur before 2050, while the UK still has a legal responsibility to reduce emissions under the current targets of the CCA08. It is almost laughable to suggest that any project developer, desperate to recoup their enormous investment, will necessarily wait from 2038 to 2050 for the next phase of capacity, which is another reason why we believe the climate test is effectively undeliverable.

Respite is the most effective noise measure currently deployed at Heathrow, so the Government's announcement that the draft HENPS will continue to support a system of respite is welcome. It is less clear how this will work in practice, and in the AoS noise annex the CAA notes that "the detailed timing or sequencing of runway alternation is therefore not explicitly modelled, because the long-term noise exposure results are determined by the total number of operations allocated to each runway over the assessment period." The draft HENPS should be explicit in setting out the requirements for respite provision and should have included an assessment on whether the current benefits can be maintained with a three-runway operation.

We welcome the proposal for a 6.5 hour night flight ban, although it remains insufficient to provide the 8 hours of sleep that humans are scientifically proven to need. In the case of Heathrow, planes regularly begin their holding and descent to Heathrow well ahead of their advertised landing times. The World Health Organisation proposes a full 8 hour ban on night flights. Regular disruptions and challenges mean that aircraft are often flying outside the permitted hours to allow airlines to complete their schedule. At the same time, it still remains impossible for communities to assess if the mitigations, including the night flight ban, are adequate if they do not know the extent to which the third runway will affect them. These mitigations are based on the use of contours and noise envelopes, which again, are subject to

change depending on the choice of flight paths and the allocation of traffic to each route, and so any proposals the scheme promoter makes at the DCO stage are unlikely to be a cast iron guarantee for all communities if the airspace modernisation process is not complete. Again it amounts to closing the stable door after the horse has bolted. We therefore suggest that there should be a requirement in the HENPS that a DCO cannot be granted before the airspace modernisation process has been completed for Heathrow's flightpaths (including with a third runway), and for night flights, in order for communities and stakeholders to better assess how they will be impacted.

There are wider issues with noise control at Heathrow that need to be considered as part of any proposed night flight ban. Currently noise policy limits Heathrow to 5,800 flights per year between 23:30 and 06:00 (which the airport adheres to). However, across the full 8-hour night period (23:00-07:00), close to 30,000 takeoffs and landings were recorded in 2025. This runs contrary to Heathrow's claim that their night flight ban is 'the strictest in Europe'. The scheduled night flight ban will only continue this practice of ignoring the massive impact of flights in the 'shoulder periods' at the start and end of the night, in this case 23:00 to 23:30 and 06:00 to 07:00. This issue of moving flights into what are still extremely sensitive periods of the night is recognised in the noise annex of the HENPS Appraisal of Sustainability: 'the ban is not expected to significantly reduce impacts in practice, as most flights would move within the final hour' (referring to 06:00-07:00). This goes against the WHO recommendation that night flight bans should be for a full 8 hour period.

Given that large parts of London currently experience the earliest arrivals regularly from 4.30am, even though the advertised landing times are past 5am (and these are the most devastating to sleep disruption), there should be strict rules that a night flight ban means no planes arriving ahead of their expected arrival time at the gate.

There should also be a rigorous approach to minimising late arrivals/departures and the use of dispensations: if there is some ambiguity in this framework, it could easily be exploited by airlines and the airport who will claim that every late landing or departure is exceptional.

4. Do you agree or disagree that the proposed ban on scheduled night flights for Heathrow following expansion should be defined based on the time a 'plane takes off or lands' instead of 'departure from and arrival to terminal'? Explain your answer.

Different types of noise (airborne or ground) affect communities in different ways, but communities would be right to expect that a night flight ban means there is a protected period of a full 6.5 hours from all sources of aircraft noise. The applied definitions need to protect this objective. The taxiing segment of a flight between departing/arriving the terminal and take-off/landing generates ground noise, and the flight component generates airborne noise. Effective protection is needed for both but selecting a definition creates a dilemma: whether to base policy on protecting those affected by ground noise, where the impacts are more localised, or prioritise airborne noise that is likely to affect a much wider area.

At present, a flight leaving the gate at 10.59pm isn't classified as a night flight even though, with congestion and taxiing, it may not take off until 11.20pm. This allows for 21 minutes of potential ground noise, and a subsequent overflight, during the protected night period. This makes time of take-off a better indicator for departures, especially considering that the start of the night-time period sees more departures than arrivals (between 2200 and 2300 there are currently 10,200 departures annually, and 6,700 arrivals - the latter occur more frequently in the early mornings). Equally, an arrival may touch down at 10.59pm but take 15 minutes to taxi to the gate. Under the current definition, this would count as a night flight, but under a definition of 'touch down' it would not.

The optimum system for ensuring that a ban delivers on noise objectives would be to use time of take-off for departures and time at gate for arrivals. This would prevent ground and landing noise during the curfew hours.

5. To what extent do you agree or disagree with the proposed designation of Heathrow expansion as defined in the draft HENPS as Critical National Growth Infrastructure (CNGI)? Explain your answer.

We strongly disagree with the proposal to designate Heathrow expansion as Critical National Growth Infrastructure (CNGI). We understand that the CNGI designation, if retained in the final version of the HENPS voted on by Parliament, and therefore designated, would mean that there would be a strong presumption in favour of development at the DCO stage. We understand that this would mean that at the DCO stage, the scheme promoter could show that there will still be residual environmental, health and social impacts which it will not be able to mitigate, but that the CNGI presumption means that the SoS can still choose to grant planning consent. This will leave little recourse to mitigate these harms once the DCO has been granted. We also understand that the CNGI framework as written sets out *lower* environmental standards than the CNP designation it appears to be modelled on - notwithstanding the fact that the need for CNP infrastructure seems less disputed than a third runway with no economic benefit, the CNP designation also requires that it must be shown that remaining environmental impacts **cannot** be avoided. In contrast, CNGI appears to say that if there are residual impacts, they will be considered at the DCO process to be outweighed by the so-called "need" for the runway to deliver growth. In addition, subject to the developments in proposed planning law currently under consideration, there could also be a curtailment of the general right to judicially review the decision.

The decision making process as laid out seems to suffer from a deep logical fallacy - the creation of the CNGI designation effectively renders the government's "economic" test (Q2) worthless, as it is built on the *presumption* that the scheme *will* deliver growth. If the CNGI designation survives, we fail to see how the scheme promoter will have to do anything at all at the DCO stage to demonstrate that the project will deliver national growth. This is all the more outrageous because the Government's own economic appraisal which accompanies the HENPS manifestly fails to show that the project delivers growth. The accompanying analysis from Frontier Economics shows a 0.05% national growth by 2056 - around £1.6bn, a full 20

years after the new runway opens. This is **ten times less** than the Chancellor of the Exchequer claimed when the Heathrow expansion plan was dusted off in January 2025. In addition, the DfT's analysis reveals that this growth will be heavily skewed in favour of London, with growth of 0.17% for London's GDP, but less than 0.03%, and in some cases zero, for the UK regions outside of London. It is difficult to see how the project can be described as having critical **national** growth priority in those circumstances. At the same time, the government's own Webtag assessment of the welfare costs of the project, through enormous environmental and community devastation, could be between MINUS £30bn and MINUS £62bn.

The government's assessment of the "need" case justifying the CNGI designation appears to rest on the Airports Commission's conclusions as the main source of evidence. It has updated the analysis and passenger forecasts as part of the HENPS and concluded that there remains strong demand for London airports. However, we do not believe the Airports Commission unequivocally provides the evidence the government claims it does. The Airports Commission quite clearly concluded in 2015 that there was a need for **one more additional runway** in the south-east as the solution to the capacity constraints facing the whole London airports system. During its two year inquiry, the Commission looked at passenger forecasts and different markets served by London Gatwick and London Heathrow. It concluded that the Heathrow North-west scheme should become that runway. However, in the intervening years, the government has given permission to Gatwick to go ahead with a second runway, and also allowed all other London airports – Stansted, Luton, London City – to expand. Together, these provide over 60mppa extra capacity - more than can be provided by a third runway at Heathrow. We do not believe it is logical to discount the effect of allowing an additional runway at Gatwick on demand forecasts at Heathrow and vice versa – and we see no analysis of that impact on the seemingly unsubstantiated claim that the whole system will be full "by the 2040s". The new DfT forecasts also build Heathrow's third runway into the modelled base case, only providing information on how demand would develop with the existing 2 runway configuration deep in the annexed data sets, making it difficult to assess the additionality of the project.

Furthermore, we do not believe that the positive economic benefits produced in the HENPS could lead to any kind of equitable national growth for everyone. These benefits accrue almost exclusively to passengers through consumer benefits unlocked through more flights to more destinations and at more convenient times. It is claimed that expansion may protect Heathrow's "hub" status, but it is effectively a monopoly over passengers who need to change planes in Heathrow held by a fully-foreign owned private company. It is unclear how these claimed consumer and passenger benefits, or the protection of the hub status, will deliver any meaningful benefit for the estimated 40% of Britons who never fly in a year, or the more than 70% of passengers who do not fly through Heathrow airport. This is in marked contrast to the use of CNP designation which is designed to help the national effort to bring down everyone's energy bills.

We find the decision to quote the “£42bn” in benefits as **the headline** figure⁵ in the Government press release announcing the draft HENPS is selective and misleading, given that it only relates to passenger benefits (as above), and *does not include* the enormous monetised environmental costs. When these are included, the scheme’s Net Present Value (NPV) reduces down to between MINUS £23.4bn and MINUS £62.5bn over 60 years. Using this figure in isolation is likely to mislead the public by appearing to justify the Government’s support for the project. We believe it should not be given unequal weight in the planning balance, when the very real negative environmental impacts in terms of a massive increase in carbon emissions, noise and air pollution, homes lost and communities erased and gridlock on local roads, are simply ignored by the decision-making on CNGI.

The suggestion that increasing capacity at Heathrow will automatically lead to more domestic connections is a fallacy, as the airport has consistently cut domestic flights as they are less profitable than international routes. The fact that the PSO designation has to be created to protect many of these routes, and paid for by the government, should be sufficient proof of this. The Airports Commission also concluded that regional connectivity could suffer unless slots were ringfenced (presumably with public subsidy) and recommended steps to ring-fence slots.

The value of freight to the UK economy seems another flimsy justification as little evidence has been supplied to support the value of air freight to the UK economy. From a supply perspective, for dedicated air freight operations, East Midlands airport already serves as a cargo hub, and the government has, since the adoption of the ANPS in 2018, approved the opening of an air freight hub at Manston Airport, where the “need case” for extra freight capacity was disputed during the DCO process.

The “need case” for extra freight capacity at Heathrow is not sufficiently evidenced in the draft HENPS. Most of Heathrow’s cargo is taken in the bellyhold of planes, which means it is restricted to relatively small volume exports by weight such as gold or Scottish salmon. Aside from whether Scottish salmon needs to be sent via Heathrow for export, we do not believe that the Government has presented evidence that there is suppressed demand for freight which would be unlocked with more capacity. Instead, the evidence presented is limited to the current values of bellyhold cargo. In fact, the aviation forecasts published alongside the draft HENPS do not present any forecast or analysis of freight trends, undermining the so-called “need case”.

We also do not follow the logic of claiming that the increasing capacity will lead to more resilience - para 2.35 admits that the serious power outage which occurred in 2025 “would not have been solved by increasing capacity”, and it may be necessary to increase power supply to Heathrow in the event of expansion, again putting extra strain on local networks. There are many things that can be done to make the airport more resilient in its current form, including investing in existing infrastructure, and the airspace modernisation programme, which has long been presented as the solution to delays and planes being stuck in holding patterns at

5

<https://www.gov.uk/government/news/new-consultation-sets-foundations-for-heathrow-expansion-to-take-off>

Heathrow. And in any event, added capacity only provides a partial, temporal solution to improving operating resilience while a new runway is under-utilised: as traffic grows on the new runway, the same problems will emerge. At the same time, by expanding the airport and emitting more carbon into the atmosphere, a third runway would lock in emissions for many years to come, contributing to climate issues that could leave the airport to having to deal with more extreme weather disruption and adaptation costs in future.

In conclusion, Paragraph 4.18 states that CNGI is supposed to reflect the ability of expansion to support “economic growth objectives, together with national resilience, connectivity, freight, passenger and wider strategic benefits”. Given what we have stated in this analysis, we do not believe any of these thresholds have been met, and the only tangible benefit identified in the entirety of the HENPS and accompanying Appraisal of Sustainability is to a very narrow section of the UK population, namely passengers.

6. To what extent do you agree or disagree that the compensation for affected residents is fair? Explain your answer.

We do not agree that any of this is ‘fair’, and in fact it is unfortunate (and telling) that after 125 pages of justifications for why the airport needs to go ahead, the subject of communities and many families who will lose their homes is the last thing to be considered. This is problematic, as the demolition of the entire village of Longford, and large parts of Harmondsworth and Sipson being rendered uninhabitable, seems to be by far the biggest environmental and social cost of the project. The draft HENPS does very little to acknowledge or mitigate the very real strain and worry on communities, and their mental health, from 25 years worth of flip flopping over whether the third runway will ever be built.

There is also an added uncertainty which is not acknowledged in the HENPS, that although the Department for Transport chose the Heathrow North West scheme as its preferred scheme, it is hard to avoid the conclusion that the HENPS has been written with the intention of also making it possible for a rival bid to be submitted from the Arora company. There are numerous mentions of a “staged scheme”, and the red area in Annex A is merely labelled “indicative scheme boundary”. Furthermore, an accompanying CAA consultation examining the question of how Heathrow recoups the costs of its capital investments from customers is also clearly written with the needs of a rival promoter in mind. All of this makes it virtually impossible for any community member living in either of the proposed zones to be able to answer this question adequately, because they don’t yet know if they will be affected. The two runway schemes affect quite different geographic areas.

The HENPS acknowledges that there are statutory requirements with regards to levels of compensation to be offered in the case of compulsory purchase. It is welcome that the government re-iterates those commitments, and encourages the scheme promoter to go beyond its statutory obligations in assisting people to move. However, again it is difficult to know if this is adequate without first knowing which villages, and how many families and households will need to be demolished and the options available for relocation.

We do not agree that the requirement of the scheme promoter to provide noise insulation within the 60 dB LAeq,16h is adequate. Heathrow is already obliged to provide insulation for at least the 63dB LAeq, 16h contour, and the broken promises and delays from that scheme are well known. The HENPS should include a strong commitment from the Government that the insulation scheme must be complete and paid for before any planes take off from the third runway. It is also unfortunate that the SoS Transport agreed in the DCO application for expansion at Gatwick that the “outer zone” or second tier of insulation was 54dB LAeq, 16h, effectively giving Heathrow residents less protection than their Gatwick neighbours.

We are also disappointed that the recommendation from the Airports Commission for a national noise levy has not been taken forward. The other community noise guarantee arising from the Airports Commission’s report was the creation of an independent body on aircraft noise. This was introduced in the form of ICCAN but later disbanded. This means communities have no independent body to consider their views and concerns about aircraft noise. The community compensation fund is a good suggestion, but we would like to see more detail on how this will be implemented and enforced, and what the money will be spent on.

7. To what extent do you agree or disagree with the requirements for surface access, including the passenger mode share targets, and the Surface access vision document? Please also provide any further comments you may have on surface access.

We welcome the requirement for the scheme promoter to develop a surface access strategy and vision, and we welcome the acknowledgement that increased vehicle journeys to an expanded airport will cause massive congestion and air pollution for local residents. However, we do not believe that what is proposed in mitigation will provide sufficient protection to communities, who would require a lot more than a commitment to work with other bodies to deliver any upgrades to rail that will be required. Specifically, we find the phrase “how it expects to meet the costs of any rail schemes required to help deliver the proposed mode share targets” ambiguous, and leaves the door open for public money being spent on any shortfall to make up for scheme delays. The HENPS repeatedly expresses aspirations and that options are “considered” but does little provide concrete guarantees, for example the following phrase:

“The promoter must meet the cost of the surface access schemes required and their surface access strategy should set out how this will be financed. The promoter must pay for the full cost of works to the strategic and local road network. The promoter will also need to set out clearly in any surface access strategy how it expects to meet the costs of any rail schemes required to help deliver the proposed mode share targets set out in this document.”

The only protection suggested is that the government “may consider attaching appropriate requirements and/or obligations to the DCO”, but again this language appears to us to be unsatisfactory, and does not include any specific backstop dates.

This may be linked to the ongoing work by the CAA to rethink the Regulated Asset Base (RAB) framework for managing how Heathrow recoups its capital investments; given this work is not finalised it seems premature to push ahead without first knowing how the costs of these rail investments will actually be met. AEF believes that there should be a requirement to make the completion of key railway infrastructure a planning condition before more capacity at the airport is released.

Despite this, there is no requirement for “all such rail enhancements” to be “comprised within the DCO application for the Northwest Runway scheme in order for development consent to be granted”. While we acknowledge that this is an enormous and complicated scheme, and the scheme promoter cannot be expected to take on the work of public bodies such as National Rail, we do not think this presents a sufficient guarantee. We believe that the scheme promoter must commit money to building the necessary rail connections, and there must be a guarantee that those extra connections are delivered before a huge increase in journeys to the airport is allowed to go ahead. TfL has noted that even if the relatively unambitious mode share targets are met, that will still result in an extra 40m passenger trips by public transport a year - it is hard to imagine how this can possibly be accommodated without bringing the rest of London’s travelling public to a standstill.

Without a requirement in the HENPS to assess the risk of those connections not materialising in the future, it seems problematic to allow passenger numbers to increase by an additional 30m (up to 116m in total) without a full assessment of the deliverability of these guarantees at the DCO stage. The mode share targets are welcome, but we feel the precise mechanics of how this so-called “backstop” would work in reality are vague. For example, there seems to be a presumption that an increase in passenger numbers to the airport will be constrained by the timing of new terminal capacity to be released - this is assumed to be in around 2038, hence the jump from 95mppa to 116mppa that year. However, there is nothing in the HENPS that **requires** this to be the case - it’s entirely plausible that the new runway will fill up very fast indeed *without* the development of a new terminal - in fact this what modelling from the Airports Commission predicted would happen. Therefore, there are no guarantees that this big jump in numbers will be gradual or managed - waiting until the passenger capacity is at 116mppa and then retrospectively attempting to apply potentially onerous planning conditions after the horse has bolted is no guarantee that local communities will be protected from significant health impacts associated with poor air quality and gridlock on local roads and motorways. It also effectively allows an increase of 10mppa per year (85mppa to 96mppa) before **any** interventions to reduce private vehicle journeys to the airport are implemented. Furthermore, in this so-called “staged” approach, the HENPS is unclear on when the decision is taken about a further increase to 150mppa - in the original DCO application, or at a point in the future?

It is disappointing that there is no concrete figure anywhere in the surface access vision document for the predicted number of extra daily car journeys expected with a 3rd runway. We get a figure of 65m extra journeys per year, but this is not broken down into mode share. We are thankful for the analysts at TfL who have done that work in lieu of the DfT, who calculate that with the relatively unambitious mode share targets of 50% public transport use by 116mppa

capacity in 2038, there will be an extra 60,000 vehicle trips per day on this incredibly congested local road network. Noting the enormity of these potential figures, the old ANPS still included an aspiration to achieve no net increase in land-side vehicle trips, but the new HENPS backtracks, and quietly shelves this possible protection for communities. The vagueness of the language in the HENPS on the requirements on scheme promoters at this point seem a dereliction of duty: “we are not requiring surface access schemes to be brought forward as part of the expansion DCO itself; rather, it requires there to be a credible plan for new rail links to be delivered ahead of airport capacity reaching 130 million or more passengers per annum” - we do not believe this is enough to protect communities and local road users from gridlock. As noted above, this all seems to be predicated on the assumption that the growth in passenger numbers is managed and gradual, but there is nothing in the HENPS to guarantee that this is the case.

8. To what extent do you agree or disagree that the Making Best Use policy should be updated? What, if anything, would you like to be considered in any update to the Making Best Use policy? Explain your answer.

We agree that the Making Best Use policy should be updated as a priority. The benchmarks used as tests, and the evidence presented at the time, have changed significantly including:

- the 2050 climate target under the Climate Change Act was amended in 2019 creating a new net zero by 2050 target. This was not anticipated at the time of the 2013 Aviation Policy Framework (the basis for the Government’s policy support for airports outside the South East of England to make best use of their existing airport capacity) and, for airports including the South East, in Beyond the Horizon, the future of UK aviation: Making best use of existing runways (MBU2018). The change affects the climate considerations in MBU2018, specifically the CCC’s 37.5MtCO₂ planning assumption used in the ‘carbon capped’ assessment which was based on meeting the previous target of a national reduction in CO₂ emissions of 80% by 2050 compared to 1990;
- the climate mitigation used in the carbon assessments has been superseded by the Jet Zero Strategy (2022), the SAF Mandate (2025), and the updated national air passenger and CO₂ forecasts (2026). The latter highlights a significantly different trajectory for UK aviation CO₂ emissions when compared to the modelling for Jet Zero, and the Government has announced that a review of the Strategy will be finalised in 2027;
- the ANAS and ANNE results suggest significantly lower thresholds for assessing noise impacts. Additionally, ICCAN – relied upon in MBU to help ensure that the noise impacts of airspace changes are properly considered and to give communities ‘a greater stake’ in noise management – has been discontinued without a suitable alternative being put in place;
- updates to airspace modernisation policy and the recently published Air Navigation Guidance and Directions, and;
- the National Air Quality Plan has been supplemented by the 2021 Environment Act which introduces new PM targets for 2024.

The existing capacity baseline for MBU has also changed since 2018. While the decisions taken since 2018 to approve expansion at Bristol, Luton, Stansted and London City are, arguably,

relevant to existing runway capacity, the decisions relating to Southampton and Gatwick clearly go beyond this definition. Gatwick's second runway in particular adds an additional 29mppa to the baseline, almost doubling the additional 32mppa of capacity in the South East already approved at Stansted, London City and Luton.

What should an update to MBU include?

Given the addition of over 60mppa of capacity since MBU2018 in the South East, excluding Heathrow's third runway, a new policy should assess whether there is still any 'need' argument for new capacity in the region. It should also assess the environmental impact of likely increases in Air Traffic Movements (ATMs). MBU2018 previously concluded that the impact of 'making best use' of existing runways would be relatively small: a 2% increase in ATMs in the "without Heathrow expansion" scenario, and 1% "with Heathrow". Again, the recent planning decisions at South East airports far exceed this ATM number. The update should also take account of the review of the Jet Zero Strategy in light of the increased carbon emissions identified in the new DfT forecasts, and to improve clarity, it should remove ambiguity about the local tests, specifying noise and PM thresholds that reflect the latest evidence.

9. To what extent do you agree or disagree that the draft HENPS provides an effective framework for decision making on development consent applications? Explain your answer.

We disagree that the HENPS provides an effective framework for decision-making. While its scope covers the main economic, environmental and health impacts arising from a potential third runway, there are some gaps in policy and the adoption of the latest evidence, and a glaring need for stronger quantifiable tests and clearer instructions to promoters on mitigation.

Gaps in policy relate to the potential adoption of the HENPS before the review of the Jet Zero Strategy (JZS). The Government has already acknowledged the need to review the JZS following the results of the 2026 CO₂ forecasts which highlight that the current trajectory of aviation emissions is insufficient to meet Jet Zero's stated level of ambition. This review is underway and is expected to be completed in early 2027. The outcome of the review could have a significant impact on carbon prices or, for example, industry costs to invest in technology improvements and greenhouse gas removals (GGRs). Or it may conclude that demand-side measures are necessary, contrary to the aim to add further capacity at Heathrow. These costs and demand implications could affect the forecasts and need case underpinning the HENPS. It also requires MPs during the period of parliamentary scrutiny to assume that a revised decarbonisation strategy for the sector will be effective, and prevents the HENPS from setting out how the potential project could assist with the delivery of a revised climate strategy.

The draft HENPS framework ignores the latest available evidence for considering noise and air pollution. The recently published ANAS and ANNE noise studies unequivocally show that public health needs to be protected at much lower thresholds than assumed in the draft HENPS, while current UK air pollution targets fall considerably short of meeting WHO recommendations. The inclusion of ANAS thresholds as a sensitivity test shows the associated change in magnitude in

the scale of impact. However, these results have not been carried through to the mitigation requirements nor have they been fully costed in the appraisal. Instead, the door is left open to a huge increase in noise and air pollution impacts which will have an extremely negative effect on the health of millions of people in London and Berkshire.

As explained above, the draft HENPS fails to require effective mitigation in some areas: as we have highlighted in relation to air pollution, the scheme promoter is not required to show detailed strategies and partnerships to deliver increased public transport journeys, it merely has to outline the approach it intends to take. Tying targets to the phased development also permits the airport flexibility in the early years before any obligations come into effect. We understand that the obligation to increase the mode share takes effect when the capacity for 116m passengers per annum comes onstream, rather than when passenger throughput reaches 116m. This needs to be clearly stated.

On accountability, we are concerned that the Secretary of State for Transport can grant the DCO without wider input from the rest of government. The Secretary of State for Transport does not have power to decide if economy-wide carbon budgets are being met, and neither does the Secretary of State for Energy Security and Net Zero have detailed knowledge of aviation sector specific progress on decarbonisation from other departments - this creates a potential gap in understanding the extent to which a scheme of this size may or may not be compliant with the framework. The draft HENPS should be amended to include a requirement for the SoS for Transport to take decisions only after receiving input from the SoS for Energy Security and Net Zero, quantifying the precise level of reductions which must be met for aviation emissions in each of the years of remaining carbon budgets to continue on a downward trajectory beyond 2050.

Finally, the robustness of the whole framework is rendered largely meaningless given that the CNGI designation allows the Government to use this “get out of jail free card”, granted with little evidence or justification, to disregard all negative unmitigated impacts, regardless of their significance.

Please contact:

Tim Johnson - Director, AEF tim@aef.org.uk

Celeste Hicks - Policy Manager, AEF celeste@aef.org.uk