

Coalition response to the DfT consultation on the Heathrow Expansion National Policy Statement

1 September 2026

Introduction

The No 3rd Runway Coalition is the largest organisation campaigning against the expansion of Heathrow. Our membership includes local communities, parliamentarians, local authorities, trade unions and environmental NGOs.

The Coalition is deeply concerned that the Government is seeking to advance Heathrow expansion despite its own analysis showing that the scheme will not deliver any of the benefits that have been claimed.

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

Strongly disagree. The Government has not made a convincing case for the need for a third runway. The evidence suggests that the scheme would largely redistribute activity from other parts of the UK rather than deliver genuine national growth.

The latest DfT forecasts show that business demand has not grown in the way previously assumed, and the wider economic benefits claimed for expansion are directly contradicted by the negative net welfare impact identified in the appraisal.

At Heathrow Airport, business travel (the key driver of economic benefit) constitutes just 18% of total passenger demand, having declined steadily over the past decade and a half. The HENPS provides limited evidence to demonstrate how increasing outbound passenger flows, particularly for leisure purposes, will translate into net economic gains for the UK. This is especially significant given the UK's persistent tourism deficit, estimated at £42 billion, which reflects a structural imbalance between inbound and outbound visitor expenditure.

The HENPS offers little in the way of new analysis to explain why additional capacity must be concentrated at Heathrow. While it emphasises consumer choice and the benefits of airline competition, it overlooks the reality that Heathrow is among the most expensive airports globally for passengers. Its regulated asset base model further entrenches its

position as a quasi-monopoly, raising questions about whether genuine competition or consumer benefit is being delivered.

Indeed, we believe it is not credible to justify a major new runway on the basis of higher fares or capacity constraints when the overall result would be to impose far greater costs on passengers, taxpayers, communities and the wider economy.

Huge general expansion being greenlighted in the London area, including at Gatwick where expansion can be achieved for a fraction of the anticipated HAL costs means that the Airports Commission's original position where only one new runway was justified in the South East has been ignored. The overall impact of expansion of Airports in the London area should be an important context for the decision made about Heathrow. Aside from the cumulative noise, pollution & carbon impacts, there are safety implications for such an increase in traffic in the busiest terminal airspace in the world.

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:

- **Air quality**

Strongly disagree. The draft HENPS air quality test is fundamentally inadequate because it treats legal compliance as though it were the same as protecting public health. Under the proposed approach, Heathrow expansion could proceed if a future application shows that it would not cause a new breach of statutory pollution limits. That is a very low bar. It would allow a significant increase in pollution exposure in communities currently below those limits, despite the real and well-established risks to people's health.

The World Health Organization is clear that there is no safe level of air pollution, particularly particulate pollution, and that harmful effects occur well below legal thresholds. Yet the draft HENPS fails to recognise this basic public-health principle. Instead, it creates a framework in which Heathrow could add substantially to local pollution while still being judged acceptable simply because an outdated legal limit has not been crossed.

This is even more concerning given the likely lifetime of any expanded airport. Heathrow expansion would operate for decades, potentially to the end of the century, but the policy relies on today's legal standards, with little indication that they will be reviewed or

strengthened over time. UK limits are already weaker than the health-based standards increasingly adopted elsewhere. The Government must adopt an air-quality test that prevents any worsening of pollution and puts the health of local communities first.

We believe that for the air pollution test to be more robust it should include assessments of:

1. the spatial distribution of Ultra-Fine Particles (UFPs) around the airport in the current and future scenarios, to monitor UFPs and to undertake to meet any UFP or 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.
2. the impact of the new runway on London's NO₂ levels which have substantially improved following the introduction of the London-wide ULEZ in 2023, and that there would be no reversal of achievement of legal limits met.
3. the additional NO_x from increased numbers of arriving and departing planes to be carried out, (considering the 4% year on year increase in NO_x emissions from bigger planes seen since 2023).
4. the potential increase in vehicle journeys because of expansion, considering the current baseline of a 45% public transport modal share.
5. the distributional health impacts on local communities from increased air pollution must be carried out.

- **Noise**

Strongly disagree. It should be a requirement within the HENPS that airspace change proposals associated with any third runway flightpaths at Heathrow are completed before impacts on communities are assessed. This is essential before any determination is made at the Development Consent Order stage as to whether noise impacts can be adequately mitigated.

The Coalition believe that the use of indicative flight paths means that noise modelling is fundamentally uncertain and does not provide clarity that local communities deserve. The current proposed approach relies too heavily on single metrics that do not reflect the lived experience of communities under flight paths.

It is not possible for communities to assess if the mitigations proposed are adequate if they do not know for sure how the third runway will affect them. These mitigations are based on the use of contours and noise envelopes, which are subject to change and so

any proposals the scheme promoter makes at the DCO stage are unlikely to be deliverable.

The Coalition is concerned that the HENPS does not fully incorporate findings from the most recent CAA and DfT supported ANAS and ANNE noise studies.

The government should set up an independent noise watchdog to extract a noise levy based against real world compliance tests if the runway is ever in operation.

The HENPS should require scheme promoters to commit to offering noise insulation to all properties exposed to noise levels in excess of 51 dBA Leq (16 hour), and relocation assistance for those exposed to high levels of aircraft noise.

- **Climate change mitigation**

Strongly disagree. The draft HENPS depends on future technological change that has not been delivered at anything like the scale required, and it does not properly account for the full warming impact of aviation, including non-CO2 effects.

Two key question remains unanswered what level of carbon emissions would a two-runway Heathrow emit in 2050 and what level of additional carbon emissions would a third runway generate across each carbon budget period from 2035 through to 2050? Without clear answers to these questions, it is difficult to meaningfully assess the scale of the impact being proposed.

The absence of this comparison leaves a critical gap in understanding the scheme's contribution to overall carbon budgets, particularly as the UK approaches its 2050 targets. We understand that the Department has undertaken this analysis which raises the question about why it has not been published?

This test remains the same as the 2018 ANPS, that the scheme promoter can rely on national aviation policy to reduce emissions caused by the scheme, and doesn't have to present any evidence that it will mitigate emissions from actual aircraft using its tarmac. This is despite the accompanying Aviation Forecasts showing that the national aviation decarbonisation policy (Jet Zero) is so far failing to constrain emissions and will be reviewed but only after a HENPS vote has taken place).

There is no explanation or quantification of what a "material impact" on the ability to meet legally binding carbon budgets is and allows for subjective interpretation of climate protections.

There is no requirement to mitigate non-CO2 emissions, which are scientifically acknowledged to have at least doubled the climate warming impact of aviation CO2 emissions to date.

The HENPS also fails to properly address the non-CO2 emissions which make up two-thirds of aviation's warming impact, or to place appropriate requirements on the Secretary of State to consider this. Section 5.67 claims that "academic research shows that there continues to be significant uncertainty regarding the magnitude of aviation's non-CO2 impacts on the climate", and therefore "the applicant is not required to quantify the non-CO2 impacts of any scheme but should assess these impacts qualitatively". We think this is extremely misleading; there is a broad scientific consensus that the non-CO2 impacts account for about two-thirds of aviation's warming impacts. The non-CO2 impacts of the third runway should therefore be quantitatively assessed, and the scheme proposer should have to explain how these will be addressed.

- **Economic growth across the country**

Strongly disagree. The GDP impact has been [revised downwards by a factor of 10](#) and now sits at 0.03 – 0.05%, by 2056, concentrated in London and the south-east.

The [New Economics Foundation have modelled](#) the 2026 Aviation passenger forecasts into an estimated impact of jobs being relocated to London Heathrow if the Government were to proceed with expansion. The DfT expects the local jobs created by the scheme to primarily represent jobs displaced from around the wider UK. The picture is stark, with 21,400 jobs shifting to London Heathrow and 15,200 jobs being lost in the wider regions of the UK in 2050.

Furthermore, keeping regional airports connected to London Heathrow will likely require long term taxpayers' subsidy through PSOs which will be in the gift of Government to decide and is likely to be unsuccessful, based on recent evidence. To use taxpayers' money to support a private company to become more like a monopoly to grow and stifle competition everywhere else in the country seems nonsensical. To have a strategy that centres on London at the direct expense of connections for the rest of the country also seems wrong.

Meanwhile, the Treasury's Green Book cost-benefit analysis concludes that the scheme has a net present value of between [-£23.4bn and -£62.5bn over 60 years](#). The treatment of economic impacts is problematic. The headline messages about benefits do not sufficiently acknowledge that the appraisal identifies a negative overall welfare impact and that many of the apparent gains are geographically concentrated or reflect displacement rather than new growth.

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.

Strongly disagree. The mitigation package set out in the draft HENPS is not comprehensive or realistic. It does not show how the climate and environmental harms of the scheme can be fully avoided, and it leaves major impacts unaddressed.

The proposed approach to aviation mitigation is overly reliant on uncertain future technologies and does not provide a credible plan for full, costed, and fair mitigation of emissions.

Nor is it realistic to claim that the harm to communities can simply be mitigated. Loss of homes, sustained noise exposure, worsened air quality and pressure on local infrastructure are all direct consequences of expansion.

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.

Somewhat agree. A ban should apply to take-off and landing times, not terminal departure and arrival times, which are less relevant to affected communities. However, its value must be assessed by the protection it gives residents, ensuring it delivers genuine reduction in sleep disturbance and subsequent harm to people’s health.

Given the recent publication of the DfT funded ANNE study, it is disappointing not to see further restrictions proposed that would provide protection in the periods that have been shown to have the greatest impact of the health of local communities. We are concerned that without such restrictions there is a risk of increasing numbers of aircraft late at night and early in the morning should expansion proceed.

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.

Strongly disagree. We have serious concerns about the decision to create and apply Critical National Growth Infrastructure designation to Heathrow expansion. As we understand it, this is a bespoke designation created for this project alone, designed on the presumption that the

project will deliver economic growth benefits. It will allow ministers greater scope to approve the project even where serious harms remain.

That is deeply troubling. If a project's economic case is strong, it should be able to withstand proper scrutiny on its merits. It should not require a specially created designation that appears designed to smooth over weaknesses in the evidence base.

The designation also raises wider concerns about democratic accountability and public confidence. Communities and stakeholders are entitled to expect that nationally significant decisions will be taken through a credible framework, not through the invention of project-specific categories that appear to pre-empt the outcome. More bluntly, the designation risks looking like a mechanism to push through a project whose economic case could not otherwise carry the necessary weight.

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

Strongly disagree. The compensation proposals are neither fair nor credible for communities already living with the consequences of Heathrow expansion. For over 20 years, residents have faced uncertainty, property blight, declining confidence in their neighbourhoods and real harm to wellbeing, yet the draft framework concentrates almost entirely on impacts after development consent is granted. That is unacceptable. Support must be available now, and eligibility for noise insulation and compensation must reflect the latest evidence—including the Aviation Night Noise Effects and ANAS studies—which shows that serious annoyance and health harm occur at lower noise levels than current policy recognises.

The proposed Community Compensation Fund is equally vague. The draft HENPS gives no justification for retaining the £50 million figure developed more than a decade ago, nor any commitment to index it for inflation over the project's 15-year period. Its value would therefore steadily erode. Ministers must establish a transparent method linking compensation to the full environmental harm caused, alongside firm arrangements for governance, monitoring and enforcement. Without these safeguards, affected communities cannot have confidence that Heathrow's promises will be honoured.

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.

Strongly disagree. Surface access arrangements remain underdeveloped. Any expansion promoter should be required to reduce car traffic, provide adequate public transport capacity, and ensure that public funds are not used to subsidise the costs of the project.

In our view, the HENPS should require all associated rail enhancements to be secured upfront, thus reducing uncertainty about whether critical surface access improvements will be delivered before a third runway opens.

Without firm financial commitments from the scheme promoter or a full assessment of delivery risks, it is difficult to understand how large the potential costs to the public purse may be to facilitate the needed public transport improvements.

Although the mode share targets are welcome, the proposed “backstop” mechanism lacks clarity and enforceability, offering limited assurance that communities will be protected from worsening air quality and congestion if targets are not met.

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.

Agree. The MBU policy is significantly out of date, fails to properly address climate change impacts and creates a major planning loophole. It is often interpreted to mean that local planning authorities should only assess ground-level emissions, leaving broader carbon impacts to national government. National authorities do not formally evaluate the wider greenhouse gas emissions tied to increased passenger numbers from these expansions, leaving carbon emissions unchecked.

The MBU was drafted before amendments to the UK's legally binding Net Zero by 2050 targets and therefore should be updated to reflect the latest legal and policy commitments. We support the view that the policy assumptions in the MBU rely heavily on future carbon pricing, greenhouse gas removals, and Sustainable Aviation Fuels (SAF) that are scaling up too slowly to justify support airport capacity increases, especially given the size of Heathrow. We also believe that climate and carbon impacts of transport projects must be transparently evaluated during local and national planning.

We believe that the MBU should include policy measures that impose binding, measurable limits on greenhouse gases, noise, and air pollution rather than relying on voluntary industry targets.

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.

Strongly disagree. The Coalition does not believe that the draft HENPS provides an effective or reliable basis for decisions on Heathrow development consent applications. Its guidance to the Secretary of State remains unclear and incoherent, particularly on aircraft noise and the wider environmental and community impacts that expansion would create.

It also fails to confront the extraordinary prospect of two separate promoters pursuing consent for competing schemes at the same time. Allowing both proposals to progress through the DCO process would create needless confusion for local people, impose major and potentially wasted costs on local authorities and other participants.

Do you have any comments on any of the additional supporting documents, including the Appraisal of Sustainability (AoS), Habitats Regulations Assessment (HRA), Equality Impact Assessment (EqIA) and Health Impact Analysis (HIA)?

The HENPS appears to present the economic and climate case in a selective way, emphasising claimed benefits while downplaying the negative impacts identified elsewhere in the Appraisal of Sustainability and the Heathrow Expansion Appraisal Report. So, is a future decision based on the HENPS or the supporting evidence which underpins it?

There has also been no change log produced so that communities can easily understand the differences between the previous consultation on the Airports National Policy Statement, what changes the Government is proposing now and why.