



Heathrow Expansion National Policy Statement

Consultation

Response by the London Borough of Hillingdon

September 2026

Contents

1	Foreword.....	3
2	Executive Summary.....	4
2.1	The Council's Position	4
2.2	The Draft HENPS Does Not Provide a Robust Basis for Expansion.....	4
2.3	Heathrow's Local Balance Sheet Has Never Been Assessed	4
2.4	A Framework Focused on Managing Harm Rather Than Testing Acceptability	5
2.5	If Government Remains Minded to Support Expansion	5
2.6	Conclusion.....	5
3	Summary of Policy Concerns and Required Changes	6
4	Introduction	8
4.1	Background	8
4.2	Legal	8
4.3	Structure	8
5	Position Statement	9
5.1	Opposition	9
5.2	Amending the draft HENPS	9
6	Hillingdon as the Host Authority.....	11
6.1	The Host Authority Relationship	11
6.2	Existing Impacts on the Borough	11
6.3	Implications of Expansion	13
6.4	Assessment of Local Authority and Public Services	14
6.5	The Way Forward – Outside the HENPS	15
6.6	The Way Forward – Inside the HENPS	18
7	Procedural Matters	20
7.1	Consultation Process.....	20
7.2	How Competing DCOs will be Managed	20
7.3	How Competing DCOs will be Assessed	21
7.4	Governance, Monitoring and Enforcement	21
7.5	Evaluation of Need.....	22
7.6	Assessing Alternatives.....	24
8	Assessment Principles.....	26
8.1	Critical National Growth Infrastructure Designation	26
8.2	Compliance with the Four Tests	27
8.3	The Economic Test	28
8.4	The Air Quality Test.....	31
8.5	The Noise Test.....	35

8.6	Climate Change	39
8.7	A Fifth Community Impact Test	41
8.8	Heathrow Expansion alongside London Plan Growth	43
8.9	Surface Access and Rail Infrastructure	43
8.10	Environmental Impact Assessment	46
8.11	Equalities Impact Assessment	47
8.12	Criteria for Good Design for Airports Infrastructure	48
8.13	Costs	48
8.14	Health	49
8.15	Placemaking	50
9	Assessment of Impacts	52
9.1	General	52
9.2	Air Quality	52
9.3	Noise	57
9.4	Climate Change Mitigation	62
9.5	Economic Growth Across the Country	65
9.6	Surface Access	68
9.7	Biodiversity and Nature Conservation	71
9.8	Land Use Including Open Space, Green Infrastructure and Green Belt	73
9.9	Home Office Assets	76
9.10	Resource and Waste Management	77
9.11	Flood Risk	79
9.12	Water Resources and Water Quality	80
9.13	Historic Environment	82
9.14	Landscape and Visual Impacts	85
9.15	Community Compensation	87
9.16	Community Engagement	90
10	Other Matters	92
10.1	Recycling T5 mitigation	92
10.2	Early Growth	93
10.3	Programme Failings	93

1 Foreword

Hillingdon Council remains unequivocally opposed to expansion. For the people of Hillingdon, Heathrow expansion is not a policy debate or a piece of infrastructure. It directly impacts their homes, their communities and their quality of life. Our residents have already lived with decades of noise, pollution, congestion, blight and uncertainty, and are now being asked to accept even greater impacts in return for benefits that remain uncertain and heavily disputed.

The draft Heathrow Expansion National Policy Statement has not altered that view. It does not strengthen the case for expansion. It exposes its weaknesses. The economic case is uncertain, heavily caveated and reliant on assumptions that may never materialise. The benefits remain speculative. The harms do not. On any objective reading of the evidence, the case for a third runway simply has not been made.

However, the Council also recognises a difficult reality. Whilst we remain firmly opposed to a third runway, the final decision will be taken by others. This response has therefore been prepared with two objectives in mind. First, to explain why the Council continues to believe Heathrow expansion should not proceed. Second, to identify the substantial changes required to the draft HENPS to meaningfully mitigate and protect those communities who will have to continue living alongside Heathrow should Government remain minded to support expansion.

With that in mind, the Council believes the final draft HENPS must provide the strongest possible safeguards given the scale of harm expansion would cause. Yet the draft policy fails in one of its most fundamental tasks. It does not explain what would actually prevent a third runway from proceeding. The Government's four tests contain no meaningful red lines, no clear failure points and no obvious route to a decision of "no". As drafted, the framework appears designed to make expansion possible rather than determine whether it is acceptable. Without stronger safeguards, tougher assessment criteria and genuine consequences for failure, there is a real risk that the principle of expansion at all costs has been accepted before the evidence has been properly tested. Throughout this document, the Council has sought to strengthen the policy framework, close obvious gaps and ensure that any future applicant is required to do far more than is currently proposed.

For too long, local communities have been expected to absorb the impacts of Heathrow's success whilst receiving only a fraction of its benefits. If the airport is to grow again, it cannot do so on the same terms as before. The communities of Hillingdon deserve a planning framework that protects them, invests in them and demands far more from the airport than has ever previously been required. That is the purpose of this response and the standard against which the draft HENPS should be judged.

Councillor Steve Tuckwell
Leader of the London Borough of Hillingdon

2 Executive Summary

2.1 The Council's Position

- 2.1.1 The London Borough of Hillingdon remains unequivocally opposed to Heathrow expansion and does not consider that a compelling case for a third runway has been demonstrated. The draft Heathrow Expansion National Policy Statement (HENPS) does not strengthen the justification for expansion; rather, it highlights the significant uncertainties, risks and unresolved issues that continue to surround the proposal. The Government's own evidence identifies uncertainty regarding the scale and distribution of the economic benefits, while the impacts on local communities, public services, health, transport networks and the environment are clear, substantial and, in many cases, unavoidable. Without a robust, evidence-based case for expansion, and without clearly identifying, securing, and funding the mitigation needed to address its impacts, the Council considers that the case for Heathrow expansion has not been made. Furthermore, the proposed approach to Heathrow is unique amongst nationally significant infrastructure projects. No other major infrastructure scheme would be permitted to generate such extensive impacts beyond its red line boundary while leaving responsibility for addressing many of those impacts to others.

2.2 The Draft HENPS Does Not Provide a Robust Basis for Expansion

- 2.2.1 The Council's principal concern is that the draft HENPS fails in one of its most important functions: to provide Parliament with confidence that Heathrow expansion is justified in principle. Instead, the document repeatedly identifies uncertainty, acknowledges unresolved impacts and defers critical questions to a future Development Consent Order process. The result is a framework that asks Parliament to endorse expansion first and establish whether it is acceptable later. The Council considers this approach fundamentally flawed.
- 2.2.2 The Government's four tests for economic growth, air quality, noise and climate change contain no meaningful failure points, no clear red lines and no obvious route to a decision of "no". As drafted, the policy appears designed to facilitate expansion rather than determine whether it should proceed. A decision-making framework that contains no realistic mechanism for refusal cannot be regarded as a robust test of acceptability and inevitably downplays the importance of mitigation measures and safeguards.

2.3 Heathrow's Local Balance Sheet Has Never Been Assessed

- 2.3.1 The Council is particularly concerned that Heathrow's relationship with its host authority is characterised more by assumption than evidence. Whilst the airport's national economic contribution is frequently cited, there has been no equivalent assessment of its overall impact on the communities, public services and local government finances of the borough that hosts it. Government has assessed the national balance sheet. It has not assessed the local one. Consequently, the draft HENPS assumes Heathrow works for host communities

without first establishing whether that is actually the case and how this needs to be addressed.

2.4 A Framework Focused on Managing Harm Rather Than Testing Acceptability

- 2.4.1 Across a wide range of topics, including air quality, noise, climate change, surface access, biodiversity, public services, placemaking and community compensation, the draft HENPS frequently identifies significant adverse impacts but then relies on future mitigation, future technologies or future actions by third parties to justify them. In many cases, the policy is stronger at identifying harm than determining whether that harm is acceptable. The consequence is a framework that appears capable of approving expansion without demonstrating that the communities affected will be adequately protected.

2.5 If Government Remains Minded to Support Expansion

- 2.5.1 Whilst the Council remains opposed to Heathrow expansion, it recognises that the final decision rests with Government and Parliament. The response therefore identifies substantial changes required to create a more balanced and robust policy framework. These include stronger policy tests, meaningful safeguards, independent oversight, enforceable mitigation, a Host Authority Impact Assessment, a Host Authority Funding Agreement and a fairer approach to sharing the benefits of nationally significant infrastructure with the communities that host it.

2.6 Conclusion

- 2.6.1 The draft HENPS does not provide Parliament with a sound basis on which to endorse Heathrow expansion. The evidence remains uncertain, the decision-making framework remains weak and many of the key questions have been deferred to a later stage. The Council considers that expansion should not proceed. If Government nevertheless remains minded to support a third runway, the final HENPS must be substantially strengthened to ensure that impacts are properly tested, public services are adequately funded, communities are effectively protected and those bearing the greatest impacts receive a fair and demonstrable share of the benefits.

3 Summary of Policy Concerns and Required Changes

Topic	Principal Concern	Required Changes
Need Case	The need for expansion remains unproven and reasonable alternatives have not been adequately reassessed against current circumstances.	Re-test the need case against current evidence and undertake a comprehensive assessment of alternatives.
Competing Promoters and DCOs	The draft HENPS provides no clear framework for managing, assessing or governing competing expansion proposals.	Establish clear governance, evidence and assessment requirements for competing promoters and schemes.
Environmental Impact Assessment	The assessment could underestimate impacts by excluding dependent infrastructure, ancillary development or later phases.	Require assessment of the full development, associated infrastructure and ultimate operational scheme from the outset.
Equality Impact Assessment	The policy is stronger on process than outcomes and lacks clear equality benchmarks.	Define acceptable equality outcomes and require equality impacts to influence decision making.
Critical National Growth Infrastructure	Designation is unsupported by the evidence and risks prejudging the outcome.	Remove the designation or provide a clear evidence-based justification and decision-making framework.
The Four Tests	The tests contain no meaningful failure points, red lines or route to refusal.	Introduce clear pass/fail criteria and define the consequences of failing a test.
Economic Growth	Economic benefits are uncertain, poorly evidenced and could simply redistribute growth.	Require economic benefits to be additional, measurable, independently verified and shared with affected communities. Consider appropriate mechanisms to capture local growth.
Air Quality	The test focuses on legal compliance rather than protecting public health.	Strengthen the framework to prioritise health outcomes, population exposure and future environmental standards.
Noise	The test manages contours rather than protecting people and communities.	Align with the latest ANAS evidence, strengthen mitigation and focus on health and quality of life outcomes.
Climate Change	The climate case relies heavily on uncertain future technologies and assumptions.	Require robust testing against pessimistic scenarios and stronger governance and mitigation measures.
Community Impact Test	Community impacts are not given equivalent weight to the Government's four tests.	Introduce a Fifth Community Impact Test with measurable and enforceable outcomes.
Host Authority Relationship	Heathrow's overall impact on Hillingdon has never been comprehensively assessed and addressed.	The impact and needs of the host authority should be a core policy consideration with a

		requirement for coordinated strategic planning, funding and mitigation.
Surface Access	Expansion relies on unproven transport assumptions and modal shift targets.	Link airport growth to transport performance and secure infrastructure before capacity is released.
Biodiversity	Excessive reliance on compensation and biodiversity metrics.	Prioritise avoidance, local delivery and long-term environmental enhancement.
Land Use and Green Belt	Significant land take and loss of community assets without adequate safeguards or a requirement for integrated regional planning.	Minimise land take, strengthen replacement requirements and improve protection of community assets.
Flood Risk and Water Environment	The framework focuses on mitigating harm rather than delivering environmental improvement.	Require net environmental gain, resilience and long-term management arrangements.
Flood Risk	The framework focuses on offsetting flood risk rather than improving flood resilience for communities and catchments.	Require a net reduction in flood risk, catchment scale assessment and long-term management arrangements.
Water Resources and Water Quality	Insufficient emphasis on forever chemicals (i.e. PFAS), water quality, water stress and long-term water resource management.	Require comprehensive PFAS assessment, protection of water quality, water efficiency, reuse and water neutrality measures.
Historic Environment	Significant heritage loss is treated as largely unavoidable.	Require stronger avoidance, greater justification for loss and a positive heritage legacy.
Landscape and Visual Impact	Cumulative landscape effects are underestimated and fragmented mitigation risks poor outcomes.	Require a coherent landscape strategy and long-term enhancement of affected areas.
Public Services and Costs	The public sector costs of expansion are largely ignored.	Require a Public Sector Impact and Cost Assessment and full funding of additional burdens.
Health	The framework focuses on assessment processes rather than health outcomes.	Introduce clear health-based objectives and capacity assessments for health services.
Community Compensation	Compensation is inadequate, inconsistently justified and overly reliant on promoter discretion.	Establish stronger compensation, community investment and enforceable benefit sharing arrangements.
Community Engagement	Engagement requirements focus on process rather than influence.	Require ongoing engagement, independent oversight and demonstrable influence on outcomes.
Governance and Enforcement	Monitoring is prioritised over accountability and corrective action.	Introduce statutory targets, independent oversight and enforceable consequences for failure.

4 Introduction

4.1 Background

- 4.1.1 The London Borough of Hillingdon welcomes the opportunity to respond to the draft Heathrow Expansion National Policy Statement (draft HENPS). As the host authority for Heathrow Airport, Hillingdon would experience the most significant impacts of expansion, including the loss of homes, increased aircraft noise, worsening environmental pressures and consequential effects on the health, wellbeing and quality of life of local communities.
- 4.1.2 Heathrow expansion has been a source of uncertainty and blight for many Hillingdon residents for decades. The continuing cycle of proposals, announcements, consultations and policy reviews has left communities living under the threat of significant change, often without clarity about their future. This prolonged uncertainty has negatively affected homes, businesses and neighbourhoods across the borough, and the Council considers that those communities deserve certainty and a decision-making process that is transparent, robust and capable of demonstrating whether expansion should proceed at all.

4.2 Legal

- 4.2.1 Notwithstanding its longstanding opposition to Heathrow expansion, the Council has engaged constructively with the draft HENPS consultation and has considered the proposals with an open mind. Should Government ultimately decide to proceed with expansion, it is essential that the final draft HENPS provides a robust and transparent decision-making framework that maximises protection for local authorities, communities and the environment.
- 4.2.2 This response sets out the Council's current views on the draft HENPS based on the information available at the time of writing. It is submitted without prejudice to the Council's future position, and the Council reserves the right to supplement, amend or expand upon any matters raised in this response as further information becomes available through the draft HENPS process, any subsequent Development Consent Order application, examination or related proceedings.
- 4.2.3 Nothing in this response should be taken as indicating support for Heathrow expansion or acceptance of any aspect of the draft HENPS, and the Council expressly reserves all legal, procedural and policy rights available to it.

4.3 Structure

- 4.3.1 The response considers the economic, environmental, transport and community implications of expansion, identifies areas where the policy framework is deficient, and sets out the amendments that the Council considers necessary to ensure that communities and the environment are properly protected should Government decide to proceed with Heathrow expansion.

5 Position Statement

5.1 Opposition

- 5.1.1 The London Borough of Hillingdon does not consider that the case for Heathrow expansion has been made. If anything, the evidence presented alongside the draft Heathrow Expansion National Policy Statement demonstrates why expansion should not proceed. The claimed benefits remain uncertain, heavily caveated and dependent on assumptions that have yet to be realised, whilst the adverse impacts on communities, health, heritage, transport networks and the environment are clear, significant and, in many cases, unavoidable.
- 5.1.2 More fundamentally, the draft HENPS fails in what should have been its primary purpose. The Government's four tests were intended to provide Parliament with confidence that expansion is justified in principle before responsibility passes to an applicant to develop the detail of a scheme. Instead, the draft HENPS provides a weak and inconclusive case, repeatedly identifying uncertainty and deferring critical questions to a future DCO process in the hope that a promoter may be able to resolve them. The Council considers this approach fundamentally flawed. If the Department is unable to demonstrate through the draft HENPS that expansion satisfies its own tests and is justified in principle, Parliament should not be asked to endorse a policy framework that leaves those questions to be answered later.
- 5.1.3 The Council is also concerned that the draft HENPS contains fundamental weaknesses within its decision-making framework. The Government's four tests lack meaningful failure points, clear thresholds or defined circumstances in which consent should be refused. As drafted, the framework appears to provide no realistic route to a decision of "no", even where significant uncertainty remains regarding future impacts and mitigation. The Council therefore questions whether the draft HENPS provides the robust, transparent and objective decision-making framework envisaged by the Planning Act 2008. Whilst the Council maintains its objection in principle to Heathrow expansion, these shortcomings create a further sense of alarm that, should it proceed, it will do so at any cost.

5.2 Amending the draft HENPS

- 5.2.1 Notwithstanding its opposition to Heathrow expansion, the Council has sought to engage constructively with the draft HENPS because, should Parliament ultimately decide to proceed, the policy framework must be capable of properly protecting affected communities and the environment.
- 5.2.2 In its current form, the draft HENPS often reads less as a framework for testing whether expansion is acceptable, and more as guidance for applicants, providing considerable flexibility in how impacts are assessed, mitigated and justified. Too much discretion is left in the hands of promoters and too many safeguards rely on future judgement rather than clear policy requirements.

- 5.2.3 The purpose of this response is therefore to identify the substantial amendments required to create a more balanced and effective framework; one that places communities on a fairer footing with applicants, establishes meaningful controls and accountability, and provides decision makers with a sound policy basis consistent with the requirements and intent of the Planning Act 2008.

6 Hillingdon as the Host Authority

6.1 The Host Authority Relationship

- 6.1.1 Heathrow is located almost entirely within the London Borough of Hillingdon. Hillingdon is therefore not simply an authority affected by the airport. It is the host authority responsible for managing many of the direct and indirect consequences of its operation.
- 6.1.2 The airport is a nationally significant economic asset, but it also operates within established residential communities. Its presence influences housing, employment, transport, education, health, policing, environmental regulation, community cohesion and the delivery of local authority services across the borough. These effects extend well beyond the operational airport boundary and cannot be understood solely through conventional assessments of noise, air quality, traffic or land take.
- 6.1.3 Despite the scale and unique nature of this relationship, there has been no comprehensive assessment of how Heathrow currently affects Hillingdon, the costs incurred by the Council and other public bodies, or the extent to which economic and employment benefits reach the communities that host the airport. The draft HENPS does not address this evidence gap. There is also no commitment in the document to any requirements for investment into these communities either as mitigation or as a commitment to materially improve the quality of life and quality of environment which are so heavily blighted by all airport-related operations.

6.2 Existing Impacts on the Borough

- 6.2.1 The Council is required to respond to a range of pressures associated with Heathrow's existing operation. These include airport-related parking and unauthorised commercial parking, taxi and private hire activity, antisocial behaviour, fly-tipping, environmental health complaints, imported food handling, planning enforcement, licensing, waste, congestion and pressure on local roads and public spaces. The council's viability as a place to develop is also materially impacted by height restrictions that prevent high-density development across the south of the borough.
- 6.2.2 The airport's role as the United Kingdom's principal international gateway also has wider implications for policing, healthcare, safeguarding, homelessness and the provision of emergency support. This can include responsibilities arising from vulnerable arrivals, people seeking asylum and other individuals requiring immediate assistance. These demands are not created or controlled by the Council, but their practical consequences often fall upon local public services.
- 6.2.3 Heathrow also affects the stability and continuity of surrounding communities. Airport-related employment creates demand for temporary, seasonal and rented accommodation. High levels of population turnover can place pressure on housing, local services and community networks. This can weaken community cohesion, particularly where

established neighbourhoods already experience deprivation, environmental burdens or long-term uncertainty about expansion.

- 6.2.4 **The Council is concerned that Heathrow's impacts on Hillingdon as the host authority are materially overlooked, and this is causing a significant level of concern given the scale of these impacts will increase as a result of the proposals in the draft HENPS.** This is a unique situation for nationally significant infrastructure projects because Heathrow's impacts do not stop at the airport boundary. The sheer scale of activity generated by the tens of thousands of planes, hundreds of millions of visitors and billions of tonnes of freight spreads geographically and across local services and communities in a way that a railway line such as HS2, once operational, does not.
- 6.2.5 The effects are particularly acute in the villages surrounding the airport, where decades of uncertainty associated with airport expansion and compulsory purchase activity have contributed to a cycle of blight. Property owners are often reluctant to invest in homes and businesses where there is continuing uncertainty about the future of the area. In some locations, residential properties acquired by Heathrow have been let on a short-term basis, reducing long-term community stability, weakening community cohesion and undermining confidence in the long-term future of these neighbourhoods.
- 6.2.6 The Council also experiences a range of indirect impacts associated with the airport's operation. This includes pressures arising from licensed taxi and private hire drivers using residential streets for waiting, parking and rest breaks, which has generated significant complaints from residents and required regulatory intervention, including the introduction and enforcement of a Public Spaces Protection Order to address associated anti-social behaviour. Such measures create an ongoing financial and operational burden for the local authority.
- 6.2.7 The airport also generates demand for ancillary uses, including commercial parking operations linked to passenger travel. The Council has been required to undertake extensive planning enforcement and trading standards action against unauthorised airport-related parking uses, including on Green Belt land. These cases have consumed substantial officer time and resulted in significant legal and enforcement expenditure over many years in order to protect the Green Belt and uphold the planning system.
- 6.2.8 Heathrow's impacts also extend across the borough's transport network. Airport-related traffic places considerable pressure on local roads, contributing to congestion, increased maintenance liabilities and greater demands on transport infrastructure. Capacity that might otherwise support local journeys, public transport users and planned growth is instead absorbed by airport-related movements. As the host authority, Hillingdon must manage these impacts despite having little direct control over the decisions that generate them.
- 6.2.9 The uncertainty created by Heathrow's future plans also places significant constraints on the Council's ability to undertake long-term place-shaping and growth planning. It is difficult to make informed decisions about housing, employment, infrastructure and environmental investment when the scale, nature and geographic extent of future airport

impacts remain uncertain. This uncertainty affects not only communities closest to the airport but also the Council's wider strategic planning functions and its ability to deliver sustainable growth.

- 6.2.10 Taken together, these impacts create a cumulative and persistent form of blight borne disproportionately by Hillingdon's residents and communities. Those who have remained in these neighbourhoods have had to endure uncertainty, environmental impacts, declining investment, pressure on local infrastructure and changes to community character over many years. This is not the image of the United Kingdom's principal international gateway that any party should wish to project. As the host authority, Hillingdon carries costs and consequences that extend far beyond the airport boundary and far beyond those experienced by neighbouring authorities. National policy should therefore explicitly recognise these impacts and provide meaningful support and mitigation for affected communities. Doing so would deliver not only local benefits but also wider national benefits by improving the quality, resilience and appearance of the communities that form the immediate setting of one of the UK's most significant pieces of national infrastructure.

6.3 Implications of Expansion

- 6.3.1 The concern follows that expansion would simply intensify this imbalance unless the final HENPS establishes a fundamentally different relationship between the airport, Government, the host authority and local communities.
- 6.3.2 In the short term, employment sites, hotels and commercial premises would be displaced to make way for airport infrastructure. This could result in job losses, business disruption and reduced business rates income before any claimed longer-term benefits are realised. At the same time, a substantial construction workforce would place additional demand on housing, transport, healthcare, policing, education, environmental health and other local services.
- 6.3.3 The compulsory acquisition of homes and businesses would also have consequences beyond the properties directly acquired. Residents may leave voluntarily because of uncertainty, construction impacts or the declining viability of communities. Schools, local businesses, places of worship, community organisations and public services could experience falling demand in some locations and increased demand elsewhere. This would make long term service and infrastructure planning extremely difficult.
- 6.3.4 The effects would not be confined to the construction period. An expansion promoter could become a significant property owner across the Heathrow Villages and surrounding areas. Without an appropriate accommodation and property management strategy, this could increase short-term letting, temporary occupation, vacant properties and population turnover. These are not normal market changes. They would be direct consequences of a nationally promoted infrastructure project and could materially undermine community cohesion and the long-term viability of remaining settlements.

6.4 Assessment of Local Authority and Public Services

- 6.4.1 As well as the wider community impacts, the draft HENPS also fails to provide a meaningful assessment of the specific implications of Heathrow expansion for the Local Authority services.
- 6.4.2 During the pre-application and Development Consent Order stages, local authorities will be expected to dedicate substantial staff time, financial resources and specialist expertise to scrutinising proposals, assessing evidence, representing communities and negotiating mitigation. These costs have not been identified, quantified or funded.
- 6.4.3 There has also been no comprehensive assessment of the consequences for local authority finances and service delivery during construction and operation. These could include:
- loss of council tax and business rates income;
 - displacement of residents, businesses and employment;
 - increased housing and homelessness pressures;
 - demand arising from temporary and construction workforces;
 - impacts on school places, catchments and continuity of education;
 - additional special educational needs and social care requirements;
 - pressure on environmental health, licensing, planning and enforcement services;
 - increased parking, taxi, waste and highway management requirements;
 - pressure and disruption on local public transport services;
 - relocation of sports clubs, community organisations and public facilities;
 - increased demand on policing and emergency services; and
 - impacts on Hillingdon Hospital, primary care, public health and wider healthcare capacity.
- 6.4.4 The assessment must consider timing as well as scale. Costs, income losses and service pressures may arise years before any claimed economic benefits or additional revenues are realised. Without transitional funding, the Council could be required to manage the most disruptive phases of expansion while experiencing a reduction in its income base.

- 6.4.5 A major infrastructure proposal cannot be considered affordable if its costs are transferred from the promoter to local authorities, the NHS, emergency services or local taxpayers. Affordability must therefore be assessed from a public sector perspective as well as from the perspective of the Airport Operator, airlines and passengers.

6.5 The Way Forward – Outside the HENPS

Recognition of the Impacts of Hosting Heathrow

- 6.5.1 The existing relationship between Heathrow and Hillingdon is not sufficiently understood, regulated or funded. Expansion should not proceed on the assumption that existing arrangements can simply be extended to accommodate a much larger airport.
- 6.5.2 The Council wishes to work with the Department for Transport, the Airport Operator and other relevant bodies to establish:
- a comprehensive understanding of how Heathrow currently interacts with Hillingdon’s communities, economy and public services;
 - a clear baseline of existing costs, impacts, benefits and funding arrangements;
 - an assessment of how expansion would change those relationships during acquisition, construction and operation;
 - a long-term accommodation and property management strategy that supports stable and sustainable communities;
 - clear local employment, skills, procurement and supply chain priorities;
 - transparent reporting on the distribution of airport related benefits;
 - a fair funding arrangement reflecting the costs incurred by Hillingdon as host authority; and
 - long term governance arrangements through which the Council and affected communities can influence priorities and hold the Airport Operator to account.
- 6.5.3 This should not be treated as discretionary community investment. It is necessary to ensure that the authority hosting nationally significant infrastructure has the resources required to manage its impacts, secure its opportunities and maintain effective public services.
- 6.5.4 Furthermore, funding cannot wait until the DCO process starts. The cumulative impacts described above are not limited to the planning system. They create significant demands across the whole authority, including highways and transportation, environmental services,

public protection, community safety, legal services, strategic planning, communications, democratic services and corporate leadership. As the host authority, Hillingdon is expected to engage with complex and resource-intensive airport matters on an ongoing basis, while continuing to deliver services to residents and businesses across the borough.

- 6.5.5 The Council is concerned that there remains no clear recognition within national policy of the disproportionate burden placed on the host authority. Heathrow Airport Limited is able to recover many of its regulatory and expansion-related costs through established aviation funding mechanisms. The Council, by contrast, has no equivalent route through which to recover the substantial costs associated with managing the impacts of the airport and its proposed expansion. As a result, the Council is required to divert finite staff, financial and technical resources away from other local priorities in order to fulfil its responsibilities as host authority.
- 6.5.6 This position is neither sustainable nor equitable. The scale and complexity of Heathrow's existing operations, combined with the additional demands arising from future expansion proposals, require a level of expertise, monitoring, engagement and enforcement that cannot reasonably be absorbed within existing local government funding arrangements. The Council therefore considers that the revised HENPS should explicitly recognise the role of the host authority and establish a mechanism through which host authorities are adequately and fairly resourced to undertake these functions.
- 6.5.7 Such support should reflect the full range of costs incurred by local authorities, extending beyond planning and development management matters to encompass the broader organisational responsibilities associated with managing the impacts of nationally significant infrastructure. Without appropriate recognition and funding, there is a significant risk that local authorities will be unable to provide the capacity, scrutiny, mitigation and community support necessary to ensure that airport growth is managed effectively and sustainably.
- 6.5.8 Given Heathrow's role as a nationally significant piece of infrastructure and the UK's primary international gateway, the costs of managing its impacts should not fall disproportionately on local residents and local taxpayers. Ensuring that host authorities are properly resourced would not only benefit affected communities but would also support the effective delivery and oversight of nationally important infrastructure, delivering benefits that are national as well as local in scope. Hillingdon Council requests that measures are put in place as soon as practicable to ensure that it is resourced to meet the burdens of hosting Heathrow Airport, and managing all costs associated with expansion that extend well beyond those that can be recovered through planning fees.**

A Future Funding Approach

- 6.5.9 If Government considers Heathrow to be infrastructure of national economic importance, it should ensure that host authorities are not left to absorb a disproportionate share of the costs associated with its operation. As part of the overall package of measures required to deliver expansion, Government should explore funding models that allow host authorities to share more directly in the economic value generated by the airport and to be

compensated for the additional pressures placed on local infrastructure and services. This could include mechanisms analogous to Freeport tax sites, growth zones or enhanced business rates retention, enabling Hillingdon to retain a greater share of airport-related tax growth and reinvest it locally to support infrastructure provision, environmental mitigation and sustainable growth.

- 6.5.10 Such an approach would recognise the unique costs and responsibilities of hosting nationally significant infrastructure and provide a dedicated source of funding for public services, infrastructure, skills, economic development and community investment.

Land Use and Transport Requirements

- 6.5.11 There is a clear need to ensure that the communities hosting Heathrow Airport are able to share more directly in the economic opportunities created by both the existing airport and any future expansion. As set out throughout this response, local residents are expected to accommodate a disproportionate share of the environmental, social and infrastructure impacts associated with Heathrow. It is therefore reasonable that the benefits package associated with expansion should also include measures that improve access to employment, skills and investment opportunities for the communities most affected.
- 6.5.12 While the strategic transport interventions required to support airport growth are important, equal attention should be given to local connectivity. Parts of Hillingdon, particularly in the north of the borough, remain poorly connected to Heathrow, with some communities reliant on a single bus route. Improved local transport connections would help ensure that residents can more readily access the employment opportunities generated by the airport and its wider economy.
- 6.5.13 We would therefore welcome further discussions on how Heathrow expansion could support enhanced rail connectivity between West Ruislip and West Ealing, building on the existing route and creating a new outer London rail connection using existing infrastructure. Such an investment could bring tens of thousands of residents within much easier reach of Heathrow and the wider employment opportunities it supports. Similarly, stronger connections between the Elizabeth Line and Uxbridge, including direct fast bus links, would better link the borough's metropolitan centre to Heathrow and strengthen its role as a focus for economic activity and growth.
- 6.5.14 Heathrow expansion should also be viewed as an opportunity to unlock the wider economic potential of locations that are strategically placed but currently constrained by poor connectivity. Stockley Park is a notable example. We are already working with the Greater London Authority to explore its future role and potential. A new Elizabeth Line station serving Stockley Park would transform connectivity, significantly increase its attractiveness for investment and help establish it as one of West London's key economic hubs.
- 6.5.15 We therefore ask that these and similar opportunities are actively explored as part of the wider package of public benefits associated with Heathrow expansion. The objective should not simply be to accommodate airport growth, but to ensure that growth leaves a

lasting legacy of improved connectivity, economic opportunity and prosperity for the communities that host it.

6.6 The Way Forward – Inside the HENPS

Land Use and Transport Impacts

- 6.6.1 Alongside the day-to-day operational impacts on the borough that require mitigation, hosting the expansion of nationally significant infrastructure on the scale proposed must also create opportunities to support the Council's wider growth objectives. However, these objectives will be materially affected both by the land take associated with the airport and by the significant increase in passengers who will rely on the borough's transport infrastructure. For the purposes of our own land use planning, we request greater clarity and certainty regarding the full extent of land required to support an operational airport, recognising that this extends far beyond the runway and terminal buildings. Millions of square feet of logistics and commercial floorspace will be displaced and require relocation; new roads and what will be two of the largest car parks in Europe will consume substantial amounts of land and further divide communities; and groundworks, attenuation ponds, river diversions and biodiversity mitigation measures will determine the future use of large areas of land within the borough over which the Council has limited influence. Finally, the current proposals would leave two of Heathrow's remaining villages, Harmondsworth and Sipson, at best heavily blighted and, at worst, potentially unviable in their current form. The HENPS must acknowledge and proactively plan for the implications of all these land use changes, not solely those within the current red line boundary.

How the HENPS Should Be Strengthened

- 6.6.2 The HENPS should require the red line boundary to be revised so that it clearly defines the full extent of land required to deliver and operate an expanded Heathrow Airport, including all associated mitigation, transport infrastructure, surface access improvements, environmental measures, operational land and ancillary uses. A clearly defined boundary is essential to provide certainty for affected communities, landowners, planning authorities and infrastructure providers, and to ensure that the full impacts of expansion are properly assessed and mitigated from the outset. Limiting this area to land south of the M4 and west of the M4 spur would establish a clear and enduring framework for future growth, safeguard surrounding areas from uncertainty and incremental encroachment, and provide a robust basis for long-term place-shaping, investment and plan-making around the airport.
- 6.6.3 The final HENPS should require applicants to prepare a comprehensive Host Authority Impact Assessment, agreed with the relevant host authority and independently reviewed. This should:
- i. establish the current relationship between Heathrow, local communities, public services and the host authority;

- ii.** quantify the costs, benefits and service demands arising from the airport and its expansion;
- iii.** assess impacts on public services, local authority finances, housing, population change and community cohesion;
- iv.** identify how economic benefits will be distributed and secured for host communities;
- v.** identify the mitigation, investment and public service capacity required; and
- vi.** establish appropriate funding, governance, monitoring and enforcement arrangements.

7 Procedural Matters

7.1 Consultation Process

- 7.1.1 The consultation process has been inadequate and has fallen short of what would be expected for a proposal of such national, regional and local significance.
- 7.1.2 The consultation was undertaken during the summer period when many residents, community groups and stakeholders are less able to engage effectively. There is no clear evidence demonstrating who was consulted, how consultees were selected, what proactive measures were taken to encourage participation, or how hard to reach groups were engaged. Given the scale of the potential impacts, greater effort should have been made to ensure meaningful public participation.
- 7.1.3 Concerns were raised on 3 June regarding the proposed consultation approach and a response was received on 10 June. However, the consultation proceeded on 18 June without any apparent consideration of those concerns or any opportunity for stakeholders to influence the consultation methodology. This creates the impression that decisions regarding the consultation process had already been made prior to stakeholder engagement.
- 7.1.4 The consultation also fails to recognise the unprecedented position of having two potential Development Consent Order (DCO) schemes progressing in parallel. There has been no meaningful explanation of how the two schemes interact, how their cumulative impacts should be assessed, or how stakeholders can provide informed responses when the scope and implications of each proposal remain uncertain.
- 7.1.5 Most importantly, consultees have not been given a fair opportunity to consider and respond to what amounts to a fundamental change in national aviation policy. A policy shift of this magnitude requires robust public engagement and clear justification. The consultation documents do not provide sufficient information to allow informed participation or scrutiny.

7.2 How Competing DCOs will be Managed

- 7.2.1 The consultation fails to explain how two competing DCO proposals can progress simultaneously in a fair, transparent and accountable manner.
- 7.2.2 At present there appears to be no framework governing the relationship between competing promoters, despite both schemes relying on public resources, stakeholder engagement and, ultimately, passenger-generated revenues to support their development.
- 7.2.3 The public could reasonably question why airport users are being asked to fund multiple competing planning proposals when only one can ever proceed. Meanwhile, affected residents risk being caught in the middle, facing competing property purchase offers, differing timescales and inconsistent eligibility criteria, creating avoidable confusion, uncertainty and distress.

- 7.2.4 Particular concern arises in relation to compulsory purchase and property compensation. A property may fall within the compulsory purchase zone of one scheme but not another, or within differing property support and compensation schemes. The consultation provides no clarity regarding how such conflicts would be managed or how fairness and consistency would be maintained.
- 7.2.5 Without a defined governance framework, residents are left exposed to uncertainty and potentially unequal treatment. The absence of clear rules, protections and oversight mechanisms for competing developers represents a significant gap in the policy framework and undermines confidence in the overall process.

7.3 How Competing DCOs will be Assessed

- 7.3.1 The Council is concerned that, despite allowing for competing promoters, the draft HENPS largely assumes a single promoter and delivery model for Heathrow expansion. This is a significant weakness. Competing DCO proposals raise fundamental questions about how evidence will be assessed, how conflicting conclusions will be resolved and how decision makers should establish a trusted baseline where promoters are actively challenging one another's evidence. It is entirely plausible that different promoters could assess the same receptors and reach materially different conclusions on environmental impacts, community effects and mitigation requirements.
- 7.3.2 The Council is equally concerned that the draft HENPS fails to address how expansion would operate if the successful promoter is not the airport operator. Many of the key policy tests rely on airport-wide outcomes, including modal shift targets, noise management, surface access performance, community compensation and environmental mitigation. Yet the policy provides no explanation of how these obligations would be delivered, monitored or enforced where responsibility for expansion rests with one organisation and operational control with another. This creates a serious accountability gap. Without clear governance arrangements, responsibilities could become blurred, leaving communities caught between organisations and key commitments fragmented and ultimately unenforceable.
- 7.3.3 Removal of the preference for a single promoter may improve design quality and reduce costs. However, it is equally likely to result in a prolonged and contentious examination dominated by disputes over evidence, environmental impacts, mitigation requirements and baseline conditions. Without a clear framework for establishing agreed evidence and accountability, the process risks becoming a highly public dispute between promoters, delaying decisions and undermining confidence in both the evidence base and the planning system.

7.4 Governance, Monitoring and Enforcement

- 7.4.1 The draft policy fails to establish a robust governance, monitoring and enforcement framework capable of ensuring that the impacts of airport expansion are effectively managed over the long term.

- 7.4.2 Experience following the Terminal 5 approval demonstrates the consequences of inadequate oversight. While commitments were made during the planning process, there was no comprehensive statutory mechanism requiring the airport to continually improve outcomes in relation to public transport, noise, air quality, community wellbeing or local economic inclusion. As a result, airport growth has continued without corresponding obligations to ensure that surrounding communities share in the benefits or are adequately protected from the impacts.
- 7.4.3 The current consultation repeats many of the same weaknesses. It relies heavily on monitoring and reporting arrangements led by the airport itself, with limited independent scrutiny and few meaningful enforcement mechanisms. Reporting alone cannot be regarded as mitigation. There must be clear requirements for corrective action where agreed targets or thresholds are breached. In particular, the policy should establish:
- vii.** Statutory targets for noise, air quality and surface access performance, supported by independent monitoring, oversight and public reporting.
 - viii.** Clear trigger points requiring mitigation or intervention where performance standards are not achieved.
 - ix.** Mandatory periodic reviews of airport impacts and mitigation measures throughout construction and operation.
 - x.** Financial safeguards to ensure adequate funding for mitigation, compensation and community support measures.
 - xi.** Enforcement powers enabling regulators and local authorities to require corrective action where commitments are not delivered.
- 7.4.4 The need for a stronger framework is evident from existing conditions around Heathrow. Public transport infrastructure is already under significant pressure, noise impacts affect communities across a wide geographic area, air quality remains a major concern and several surrounding communities experience levels of deprivation that run counter to wider regional trends. These issues demonstrate that airport growth cannot simply be accompanied by monitoring; it must be linked to enforceable obligations and measurable improvements.
- 7.4.5 Without a comprehensive governance, monitoring and enforcement regime, there is a substantial risk that future expansion will replicate historic shortcomings, with local communities experiencing the impacts of growth without receiving the protections, investment and benefits that were intended.

7.5 Evaluation of Need

- 7.5.1 The Council does not consider that the need case presented within the draft HENPS has been sufficiently demonstrated. Much of the evidence relies on assumptions regarding future connectivity, market behaviour and economic outcomes that are either unproven or inadequately evidenced.

Reliance on Airports National Policy Statement (ANPS) Conclusions

- 7.5.2 The Council is concerned that the draft HENPS frequently relies upon conclusions reached for the 2018 ANPS without demonstrating that those conclusions remain robust in light of updated evidence. This is an unsound approach. The review has been undertaken precisely because circumstances, legislation, policy and evidence have changed since designation of the ANPS.
- 7.5.3 Conclusions reached under a previous policy framework cannot simply be transferred into a new National Policy Statement without being re-tested against current evidence and assumptions. In doing so, the draft HENPS risks treating historic conclusions as settled fact rather than demonstrating that they remain valid. Where the Government relies on previous findings, it should clearly explain why they remain applicable and provide sufficient evidence to support that conclusion. Otherwise, Parliament is being asked to endorse expansion on the basis of assumptions that have not been adequately re-examined.

The Connectivity Case Remains Unproven

- 7.5.4 Routes are determined by commercial demand, not Government policy. The existence of additional runway capacity does not guarantee the creation of new routes or the opening of emerging markets. Airlines allocate capacity to maximise commercial returns, and there is little evidence that additional slots at Heathrow would be directed towards strategically important but commercially marginal destinations. The draft HENPS repeatedly references connectivity benefits and access to emerging economies, yet provides limited evidence that airlines would use additional capacity in this way. New routes remain a commercial decision and cannot be assumed as an automatic outcome of expansion.
- 7.5.5 The Terminal 5 case relied in part on the assertion that capacity constraints were preventing Heathrow from developing new routes and maintaining competitiveness against rival European hub airports, particularly Charles de Gaulle.
- 7.5.6 However, Heathrow subsequently operated with greater runway utilisation and aircraft movement levels than CDG, yet CDG developed a broader destination network. This suggests that the additional capacity delivered by Terminal 5 was not translated into a corresponding increase in destination connectivity. Instead, available capacity appears to have been concentrated on commercially attractive existing routes and increased frequencies, benefiting the airport operator and airlines but not necessarily delivering the wider connectivity benefits relied upon to justify expansion.
- 7.5.7 The link between additional capacity and additional connectivity has therefore not been demonstrated and should not be relied upon.

Public Opinion and the Hub Airport Assumption

- 7.5.8 The reliance on public opinion polling should also be treated with caution. Whilst surveys may provide useful contextual information regarding public attitudes, they do not constitute evidence of need and should not be afforded significant weight in justifying a

nationally significant infrastructure project. Public support does not demonstrate that expansion is required, that alternatives have been exhausted, or that the claimed benefits will materialise.

- 7.5.9 The argument that Heathrow must expand because it is the UK's only hub airport is circular. Heathrow is the UK's only major hub airport because successive Governments have chosen to concentrate aviation growth there. The existence of a single hub is therefore a consequence of policy rather than an immutable fact. Alternative models exist internationally, including countries that successfully operate multiple hub airports and distribute connectivity across several locations. The need case does not adequately explain why these alternatives are unsuitable for the UK.

Consistency with Wider Transport Policy

- 7.5.10 There are also unresolved tensions between wider Government transport policy and the rationale for expansion. For example, one of the principal justifications for HS2 was to reduce reliance on domestic aviation by improving rail connectivity between major cities. By contrast, part of the case for Heathrow expansion relies upon strengthening domestic feeder routes into the airport. The draft HENPS does not adequately explain how these positions fit within a coherent national transport strategy.

Resilience and Strategic Alternatives

- 7.5.11 The need case also gives insufficient consideration to resilience. Expanding Heathrow further increases national dependence on a single airport and transport node. The March 2025 closure of Heathrow, alongside recurring disruption on rail corridors serving the airport, demonstrated how a single incident can have widespread consequences for passengers, businesses and the wider economy. A more geographically distributed airport system may provide greater resilience, redundancy and operational flexibility than concentrating ever greater levels of activity at Heathrow.
- 7.5.12 Ultimately, the draft HENPS assumes that additional capacity at Heathrow will translate into improved connectivity, economic growth and national benefit. The evidence presented does not convincingly demonstrate this. The Council considers that the Government has not adequately tested alternative aviation strategies, demonstrated that additional capacity would be used in the manner envisaged, or shown that Heathrow expansion represents the most appropriate solution to the UK's future aviation needs.

7.6 Assessing Alternatives

The Need for an Updated Assessment

- 7.6.1 The Council is not satisfied that the draft HENPS demonstrates that reasonable alternatives have been adequately assessed against current circumstances. Much of the strategic rationale underpinning Heathrow expansion originates from the Airports Commission's work completed in 2015. Since then, there have been significant changes in aviation

demand, environmental policy, climate obligations, airport capacity across the Southeast and patterns of business travel. The draft HENPS does not sufficiently explain why those changes do not warrant a fresh and comprehensive assessment of alternative approaches to meeting future aviation needs.

Alternatives as a Fundamental Part of Decision Making

- 7.6.2 This is particularly important because the assessment of alternatives is not simply a policy exercise but a fundamental component of lawful decision making. Where a proposal would give rise to substantial environmental, social and community impacts, there must be confidence that less harmful alternatives have been rigorously examined and discounted on the basis of evidence. The Council is concerned that the draft HENPS appears focused on justifying Heathrow as the preferred solution, rather than testing whether the same objectives could be achieved through less harmful alternatives.

Demonstrating why Heathrow is Preferred

- 7.6.3 Given the scale of the impacts identified in the Appraisal of Sustainability, the Government should be able to clearly demonstrate not only why Heathrow expansion is beneficial, but why reasonable alternatives are materially less suitable. Without a transparent and up to date assessment of alternatives, the case for Heathrow expansion appears predetermined rather than evidence led. This undermines confidence in the draft Heathrow Expansion National Policy Statement and its conclusions.

8 Assessment Principles

8.1 Critical National Growth Infrastructure Designation

- 8.1.1 The Council does not consider that the evidence presented justifies designation of Heathrow expansion as Critical National Growth Infrastructure (CNGI).

No Evidential Basis for the Designation

- 8.1.2 There is no clear evidential basis for the CNGI designation. The Government has not explained what tests, criteria or threshold a scheme must satisfy to be considered CNGI. The designation therefore appears to be an assertion rather than a conclusion derived from evidence. This undermines confidence in the objectivity and soundness of the policy framework and the decision-making framework it creates.
- 8.1.3 The designation is difficult to reconcile with the Government's own appraisal, which identifies a negative Net Present Value when the scheme's costs and benefits are assessed in the round. In simple terms, the evidence suggests the costs outweigh the benefits. The economic case remains uncertain and heavily dependent on forecasts and assumptions, whilst the impacts on communities, health, air quality, noise and the environment are significant, measurable and largely undisputed.

The Designation Prejudges the Outcome

- 8.1.4 More fundamentally, the designation risks creating the perception that the conclusion has been reached before the evidence has been properly tested. Rather than demonstrating that Heathrow expansion is critical to national growth, the draft HENPS appears to assume that it is and then constructs the policy framework around that assumption.
- 8.1.5 This concern is heightened by the absence of clear pass and fail criteria for the Government's four tests. The draft HENPS does not explain how the tests should be weighed, whether failure of a single test would justify refusal, or what circumstances would make expansion unacceptable. The effect is to tilt the decision-making framework towards approval from the outset. The question becomes not whether expansion should proceed, but how it can be made acceptable.
- 8.1.6 The Council's concern is therefore not simply the designation itself, but its interaction with a policy framework that contains no clear red lines and no obvious mechanism for saying "no". The Government should not designate a scheme as "critical" before demonstrating that its own tests can be met and before establishing a clear and transparent decision-making framework.

The Designation No Longer Reflects Current Circumstances

- 8.1.7 The designation also fails to reflect the significant changes that have occurred since the Airports Commission reported in 2015, including additional airport capacity elsewhere in the Southeast, changes in travel behaviour and substantially stronger climate obligations.

The need case should therefore be re-examined against current circumstances rather than treated as a settled conclusion.

- 8.1.8 In its current form, the designation appears premature, prejudicial and insufficiently evidenced. It risks undermining confidence that the draft HENPS provides the objective and balanced decision-making framework required by the Planning Act 2008.

8.2 Compliance with the Four Tests

The Four Test Framework

- 8.2.1 The draft HENPS fails one of the fundamental purposes of a National Policy Statement under the Planning Act 2008. Rather than establishing a clear framework against which development consent applications can be assessed, it creates a series of high-level aspirations without defining how decisions should actually be made.
- 8.2.2 The Government has repeatedly stated that Heathrow expansion must satisfy four tests relating to economic growth, air quality, noise and climate change. However, the draft HENPS does not explain:
- whether all four tests must be met;
 - whether failure of a single test should result in refusal;
 - whether one test can be traded against another;
 - what weight should be given to competing outcomes; or
 - what constitutes success or failure under each test.
- 8.2.3 This is a critical failing. The purpose of a National Policy Statement is not merely to describe relevant considerations, but to provide a clear and transparent basis for decision making. The draft HENPS does not do this. There are no meaningful thresholds, no clear red lines and no obvious circumstances in which expansion would be considered unacceptable.
- 8.2.4 The weakness of the framework is particularly concerning because designation of the draft HENPS would establish the principle of Heathrow expansion before a Development Consent Order is examined. Once designated, the examination process will focus primarily on the detailed impacts and mitigation of a scheme. Parliament must therefore be satisfied that the policy framework itself contains clear decision-making criteria before endorsing the principle of expansion.
- 8.2.5 Instead, the draft HENPS creates a situation in which expansion appears capable of passing the policy tests regardless of the outcome. The economic test has no measurable threshold. The air quality test is based primarily on legal compliance rather than health

outcomes. The noise test allows the redistribution of harm. The climate change test depends heavily on future assumptions and technologies beyond Heathrow's control. None of the tests contains a clearly defined failure point.

- 8.2.6 A decision-making framework that contains no obvious mechanism for saying "no" is not a decision-making framework at all. The final HENPS should clearly define pass and fail criteria for each test, identify the consequences of non-compliance and state explicitly whether failure of an individual test would justify refusal. Without these elements, the draft HENPS operates less as a framework for determining whether expansion should proceed and more as a framework for explaining how it might be approved.

8.3 The Economic Test

The Test is Not Meaningful

- 8.3.1 The Council is concerned that the Economic Growth Across the Country test is the least clearly defined and least robust of the Government's four tests.
- 8.3.2 A fundamental weakness is that the draft HENPS never properly defines what the test actually is. Whilst the policy repeatedly refers to supporting economic growth across the country, it provides no measurable threshold against which compliance can be assessed. Unlike air quality, which is linked to legal limits, or noise, which is assessed against recognised metrics and contours, there is no economic benchmark that an applicant must satisfy. As drafted, the test appears impossible to fail. The draft HENPS also fails to define:
- how much economic growth is required;
 - where that growth should occur;
 - whether redistribution of economic activity is acceptable;
 - what level of certainty should be attached to economic forecasts;
 - how competing economic and environmental outcomes should be balanced; and
 - what evidence would be sufficient to demonstrate failure.
- 8.3.3 Without clear criteria for success or failure, the Economic Growth test risks becoming little more than a presumption that expansion delivers economic benefits irrespective of what the evidence ultimately demonstrates.

The Council's Position

- 8.3.4 The Council's position can be summarised as follows:

- i. the economic case supporting Heathrow expansion remains uncertain and heavily dependent on assumptions regarding connectivity, demand and future economic outcomes;
- ii. the Government's own evidence identifies uncertainty regarding both local and national economic benefits;
- iii. the principal economic appraisal identifies a negative Net Present Value when costs and benefits are assessed in the round;
- iv. the evidence does not clearly demonstrate that additional runway capacity would deliver the connectivity outcomes relied upon to justify expansion;
- v. the draft HENPS does not adequately distinguish between genuinely additional economic growth and the redistribution of economic activity; and
- vi. In these circumstances, the Economic Growth test cannot reasonably be regarded as a meaningful safeguard. As drafted, it is difficult to see how the test could ever fail, regardless of the outcome of the evidence.

Evidence from the Draft HENPS and Supporting Assessments

- 8.3.5 The draft HENPS identifies economic growth and increased airport capacity as principal justifications for expansion. However, the **Appraisal of Sustainability (AoS)** provides limited explanation of the evidence underpinning that conclusion. Whilst referring to new economic analysis undertaken by Government, it does not clearly set out the modelling assumptions, supporting evidence or literature on which its conclusions rely.
- 8.3.6 Furthermore, the AoS identifies local economic effects as 'mixed' and national economic outcomes as 'uncertain'. This falls well short of demonstrating a compelling economic case for expansion.
- 8.3.7 The **Heathrow Expansion Appraisal Report (HEAR)** identifies a range of economic benefits associated with increased airport capacity, enhanced connectivity and passenger welfare. Total monetised benefits are estimated at between £29.2 billion and £42.4 billion.
- 8.3.8 However, when these benefits are considered alongside environmental costs, airport construction costs and impacts on airport and airline profitability, the overall Net Present Value remains negative in all core scenarios. The report therefore does not conclude that Heathrow expansion generates a positive economic return under the Government's conventional appraisal framework.
- 8.3.9 The principal justification for expansion therefore shifts to the **Spatial Computable General Equilibrium (SCGE)** modelling, which identifies a modest positive effect on UK GDP through connectivity and productivity benefits. However, the magnitude of this effect remains extremely small, amounting to approximately 0.05% of GDP by 2056.
- 8.3.10 More significantly, the independent peer review concluded that approximately 88% of the GDP gain identified by the SCGE analysis derives from airport construction expenditure

rather than improvements in connectivity. Only a small proportion of the identified benefit is attributable to the enhanced aviation capacity itself.

- 8.3.11 Collectively, the evidence suggests that Heathrow expansion may generate wider economic benefits, but it does not demonstrate the transformational national gains often claimed in support of the project.
- 8.3.12 The robustness of this evidence is further undermined by concerns regarding transparency and scrutiny. Key economic documents were published after the consultation commenced, raising questions as to how they could have informed the Appraisal of Sustainability. The peer review itself acknowledges that modelling outputs were provided only shortly before review and that aspects of the methodology remained opaque or insufficiently explained.

Whilst having sight of some earlier working notes, modelling results including the sensitivity tests were only made available to me on 4th June. This peer review has therefore been completed over a short timeframe of a week.

Conclusion

- 8.3.13 The scale of harm associated with Heathrow expansion demands an economic justification that is clear, compelling and beyond reasonable doubt. The evidence presented falls well short of that standard.
- 8.3.14 The Government's own evidence identifies a negative Net Present Value, modest wider economic benefits, substantial uncertainty regarding local and national outcomes and continuing questions regarding the robustness of the supporting analysis.
- 8.3.15 In these circumstances, the Economic Growth test cannot reasonably be regarded as a meaningful safeguard. It lacks measurable criteria, contains no identifiable failure point and provides no realistic basis upon which expansion could be refused for failing to deliver the economic outcomes claimed.

Strengthening the Test

- 8.3.16 A strengthened Economic Growth test should require applicants to demonstrate not simply that economic benefits may arise, but that they are real, additional, geographically understood and capable of being delivered with a reasonable degree of certainty. The Council considers that the Economic Growth test should be strengthened by:
- clearly defining what constitutes economic growth across the country in the context of expansion and establishing measurable pass and fail criteria for the test;
 - requiring economic benefits to be genuinely additional and not simply the redistribution of economic activity from other parts of the UK;

- requiring positive economic outcomes to be realised at national, regional and local levels, with clear identification of how each contributes towards the stated policy objective;
- requiring economic benefits to be distributed in a manner that supports growth across the UK and avoids undue concentration of activity within London and the Southeast;
- requiring communities most affected by Heathrow expansion to receive a fair and measurable share of the economic benefits arising from the development;
- requiring economic forecasts, modelling and assumptions used to support the test to be independently scrutinised and verified; and
- requiring sufficient certainty that the anticipated economic benefits will be realised and are capable of justifying the impacts arising from expansion.

8.3.17 The economic benefits must demonstrably outweigh the harms, and it is for the applicant to prove this.

8.4 The Air Quality Test

The Test is Not Meaningful

- 8.4.1 The Council is concerned that the proposed Air Quality Test is not a meaningful test of environmental acceptability. Despite the Government's own evidence identifying major adverse air quality and health impacts, together with significant uncertainty regarding future mitigation, the test is largely limited to compliance with current legal thresholds.
- 8.4.2 Those thresholds are themselves considerably less demanding than both World Health Organisation guidance and the standards now being adopted within the European Union. As drafted, the test provides limited assurance that Heathrow expansion would deliver acceptable environmental or public health outcomes.

The Council's Position

- 8.4.3 The Council's position can be summarised as follows:
- i. the Government's own evidence cannot rule out long term adverse air quality effects;
 - ii. the Government's own evidence identifies major adverse health effects for vulnerable groups;
 - iii. the Policy accepts outcomes are dependent upon future mitigation measures that are not yet secured;

- iv. compliance with current legal limits is not an appropriate sole benchmark for infrastructure expected to operate well beyond 2050;
- v. current legal compliance does not necessarily equate to protection of public health; and
- vi. **the Air Quality Test allows harmful levels of pollution that undermine the protection of public health.**

Evidence from the Draft HENPS and Supporting Assessments

- 8.4.4 The draft HENPS introduces a revised Air Quality Test requiring the Secretary of State to be satisfied that, with appropriate mitigation, surface access strategies and operational measures, the scheme would not create new breaches of statutory air quality obligations or materially worsen existing breaches. Whilst this represents a strengthening of the previous policy framework, the test remains focused on compliance with current legal obligations rather than compatibility with the future direction of environmental policy over the lifetime of the development.
- 8.4.5 The Government acknowledges that, whilst road vehicle emissions have generally declined since 2018 and electrification of airport operations has reduced certain emission sources, the trend towards larger aircraft and increased airport activity means that **long term adverse air quality effects cannot be ruled out**. Updated modelling will be required at the Development Consent Order stage to quantify these effects and identify any necessary mitigation.
- 8.4.6 This is a significant conclusion. It demonstrates that the Government cannot currently conclude that the proposed mitigation package will eliminate long term adverse air quality effects. Instead, acceptable outcomes rely upon future assessments and future mitigation measures that have yet to be defined or secured.
- 8.4.7 The Appraisal of Sustainability reaches a similar conclusion. Whilst improvements in vehicle technology are expected to reduce background concentrations of certain pollutants, Heathrow expansion is expected to increase localised PM_{2.5} concentrations and population exposure in some locations. The assessment also concludes that the overall effect on population exposure is complex and uncertain and identifies **major adverse effects** in relation to air quality at the strategic level. Acceptable outcomes remain heavily dependent upon future mitigation measures, regulatory controls and wider system improvements.
- 8.4.8 The Health Impact Assessment reaches a similarly important conclusion. Whilst recognising potential economic benefits, it identifies **major adverse health effects** for vulnerable groups arising from operational air quality impacts, together with effects associated with housing displacement and access to social infrastructure. It also estimates a national air quality disbenefit of approximately **£879 million** in 2024 prices, demonstrating that residual health impacts remain even after allowing for future improvements in emissions technology.

- 8.4.9 Consequently, Government's own evidence identifies significant uncertainty, adverse health impacts and continued reliance on mitigation measures that have yet to be fully defined or secured.

Current Compliance is Not the Same as Protecting Health

- 8.4.10 The principal weakness of the draft Air Quality Test is that it largely equates compliance with current legal obligations with environmental acceptability. For infrastructure intended to operate well beyond 2050, that approach is insufficient. The assessment should also demonstrate compatibility with the direction of future environmental policy and the protection of public health.
- 8.4.11 The divergence between current UK standards, emerging European standards and World Health Organisation guidelines is significant as shown in the table below. For annual mean nitrogen dioxide, the current UK limit is 40 µg/m³. The equivalent European limit will fall to 20 µg/m³ from 2030, whilst the WHO guideline is 10 µg/m³. Similar differences exist for PM₁₀ and PM_{2.5}. These differences reflect a growing scientific consensus that the health effects of air pollution occur at much lower concentrations than historically assumed.
- [https://hillingdon-my.sharepoint.com/personal/ithynne_hillingdon_gov_uk/_layouts/15/Doc.aspx?sourcedoc={B3C11B43-6512-4EE1-983C-34DE984B28AE}&file=Heathrow Expansion National Policy Statement - LBH Response - Sept 2026 - draft for circulation.docx&action=default&mobileredirect=true](https://hillingdon-my.sharepoint.com/personal/ithynne_hillingdon_gov_uk/_layouts/15/Doc.aspx?sourcedoc={B3C11B43-6512-4EE1-983C-34DE984B28AE}&file=Heathrow%20Expansion%20National%20Policy%20Statement%20-%20LBH%20Response%20-%20Sept%202026%20-%20draft%20for%20circulation.docx&action=default&mobileredirect=true)

Pollutant	Averaging Period	UK 2030 Position	EU 2030 Limit	WHO 2021 Guideline
PM _{2.5}	Annual mean	10 µg/m ³	10 µg/m ³	5 µg/m ³
PM _{2.5}	24-hour mean	No standard	25 µg/m ³ (18 exceedances/year)	15 µg/m ³
PM ₁₀	Annual mean	40 µg/m ³	20 µg/m ³	15 µg/m ³
PM ₁₀	24-hour mean	50 µg/m ³ (35 exceedances/year)	45 µg/m ³ (18 exceedances/year)	45 µg/m ³
NO ₂	Annual mean	40 µg/m ³	20 µg/m ³	10 µg/m ³
NO ₂	24-hour mean	No standard	50 µg/m ³ (18 exceedances/year)	25 µg/m ³
NO ₂	1-hour mean	200 µg/m ³ (18 exceedances/year)	200 µg/m ³ (3 exceedances/year)	200 µg/m ³

- 8.4.12 The direction of travel is therefore clear. Environmental regulation is progressively moving towards lower pollutant concentrations and greater protection of public health. Determining the acceptability of nationally significant infrastructure solely against current legal limits risks authorising development that may be inconsistent with future environmental objectives over much of its operational life.
- 8.4.13 This is particularly important for Hillingdon and neighbouring authorities, where the Health Impact Assessment identifies children, older people, pregnant women and those with pre-existing respiratory or cardiovascular conditions as particularly sensitive to air pollution. The evidence also indicates that several communities around Heathrow already experience adverse health indicators associated with air pollution.

Conclusion

- 8.4.14 The Council considers that compliance with current statutory obligations should be regarded as the minimum requirement rather than the primary test of acceptability.
- 8.4.15 The Government's own evidence identifies major adverse air quality effects, major adverse health impacts and significant uncertainty regarding future mitigation. In these circumstances, the Air Quality Test cannot be regarded as a robust safeguard if it is limited largely to demonstrating compliance with current legal limits.
- 8.4.16 The Council considers that Heathrow expansion should be required to demonstrate compatibility with evolving environmental standards, continued reductions in population exposure and the protection of vulnerable communities throughout the operational life of the development.

Strengthening the Test

- 8.4.17 The Council considers that the Air Quality Test should distinguish between:
- strategic air quality management through operational, design and surface access measures; and
 - protection of communities through reduced exposure to harmful pollutants and improved health outcomes.
- 8.4.18 A strengthened Air Quality Test should demonstrate that:
- i. significant adverse effects on public health are avoided;
 - ii. air quality impacts are mitigated, minimised and reduced over time;
 - iii. population exposure to harmful pollutants is reduced wherever reasonably practicable;
 - iv. vulnerable communities and existing air quality hotspots are properly protected;

- v. Heathrow expansion remains compatible with the foreseeable tightening of air quality standards over the operational life of the development;
- vi. the benefits of cleaner vehicles, cleaner aircraft and improved technology are shared with communities rather than solely facilitating additional airport growth;
- vii. effective mitigation measures are secured and not dependent upon uncertain future interventions or third-party actions;
- viii. emerging pollutants, including ultrafine particles, are appropriately monitored and managed using a precautionary approach;
- ix. local Air Quality Action Plans and wider public health objectives are supported rather than undermined; and
- x. both strategic air quality controls and community health outcomes must be satisfied before the overall Air Quality Test can be passed.

8.5 The Noise Test

The Test is Not Meaningful

- 8.5.1 The Council is concerned that the proposed Noise Test provides little assurance that communities will experience acceptable noise outcomes. Despite aviation noise being one of the most significant and widely recognised adverse effects of Heathrow expansion, the proposed test focuses primarily on maintaining an overall noise contour rather than demonstrating that impacts on health, wellbeing and quality of life have been avoided or reduced.
- 8.5.2 A scheme could satisfy the proposed test whilst exposing new communities to aircraft noise, increasing impacts on existing communities and consuming the benefits of quieter aircraft to accommodate additional growth. As drafted, the test operates more as a noise management tool than a meaningful test of environmental acceptability.
- 8.5.3 A fundamental weakness of the proposed test is that it assumes the 2024 baseline represents an acceptable level of noise impact. It does not. Many communities already experience significant adverse effects from Heathrow operations and existing mitigation schemes do not reach all those affected. The test therefore risks treating an unsatisfactory position as the benchmark for success. If aircraft noise reduces over time, the benefits should be shared with communities through lower levels of exposure, not consumed by additional airport growth.

The Council's Position

- 8.5.4 The Council's position can be summarised as follows:
 - i. aviation noise remains one of the principal adverse impacts of Heathrow expansion;

- ii. the proposed test focuses on aggregate contour outcomes rather than the impacts experienced by individual communities;
- iii. the test permits the redistribution of noise impacts, including the creation of newly affected communities;
- iv. the test relies heavily on future reductions in aircraft noise, allowing the benefits of quieter aircraft to be absorbed by airport growth rather than shared with communities;
- v. the proposed mitigation and compensation package does not reflect the Government's latest evidence regarding community annoyance; and
- vi. **the proposed Noise Test allows significant adverse effects on health, wellbeing and quality of life to occur**

Evidence from the Draft HENPS and Supporting Assessments

8.5.5 The Council is concerned that the proposed Noise Test is not a meaningful test of environmental acceptability. The Noise Policy Statement for England establishes a clear hierarchy of objectives:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- where possible contribute to improvements in health and quality of life.

8.5.6 The proposed test confuses the management of noise contours with the protection of communities. Whilst contour areas may be a useful strategic metric, they do not demonstrate whether significant adverse effects on health, wellbeing and quality of life have been avoided.

8.5.7 A particular concern is that the proposed approach treats maintenance of an overall contour area as evidence that impacts are acceptable. In practice, communities may become newly affected by aircraft noise whilst others experience improvements, with the overall contour area remaining unchanged. The test therefore permits the redistribution of noise impacts and does not guarantee protection for communities experiencing significant increases in aircraft noise.

8.5.8 The draft HENPS also relies heavily on assumptions that newer aircraft will be quieter than the 2024 baseline. However, the policy allows those reductions to facilitate additional airport activity whilst maintaining overall noise exposure at or near current levels. The practical consequence is that the benefits of quieter aircraft accrue primarily to the airport through increased capacity rather than being shared with communities through a reduced noise footprint.

- 8.5.9 Maintaining a contour area does not necessarily demonstrate avoidance of significant adverse health effects. The Council is therefore concerned that the proposed test lacks a direct link to the health and quality of life objectives contained within national noise policy.

The Draft HENPS Does Not Reflect Current Evidence

- 8.5.10 The Council is concerned that the proposed mitigation and compensation package is not aligned with the Government's latest evidence regarding the effects of aircraft noise on communities. The Aviation Noise Attitudes Survey 2023-2024 (ANAS) demonstrates that community annoyance now occurs at substantially lower noise exposures than previously assumed.
- 8.5.11 ANAS found that approximately 10% of the population are highly annoyed at around 43 dB LAeq,16h, compared with approximately 54 dB LAeq,16h in the earlier SoNA 2014 survey. The study further concludes that annoyance levels are higher than those identified by SoNA 2014 at all noise exposures examined.
- 8.5.12 The significance of this finding cannot be overstated. The Government's own evidence now demonstrates that substantial numbers of people experience significant adverse effects from aircraft noise at levels materially below those at which mitigation and compensation measures become available.
- 8.5.13 To compound matters, the draft HENPS proposes a contribution of up to £3,000 for acoustic insulation for properties within specified noise contours. However, neither the draft HENPS nor its supporting evidence explains why £3,000 remains an appropriate figure in light of current evidence regarding noise effects, modern construction costs or the characteristics of individual properties. The approach appears to prioritise certainty of cost to the promoter rather than certainty of outcome for affected residents.
- 8.5.14 Furthermore, Gatwick Airport Limited offered up to £6,500 towards property insulation despite affecting far fewer properties. The greater scale of Heathrow expansion is not a justification for providing less support to individual households. The Council is concerned that the proposed contribution appears to have been determined by what is affordable to the Airport Operator rather than what is necessary to protect residents. This reflects a recurring theme within the draft HENPS, whereby the costs to the promoter are given greater weight than the impacts on affected communities.
- 8.5.15 Particular concern arises from the continued reliance on a 60 dB LAeq,16h threshold for full acoustic insulation. The Government's latest evidence indicates that significant annoyance occurs at substantially lower noise levels. The policy therefore triggers substantial mitigation only after a large proportion of those adversely affected by aircraft noise have already been excluded from assistance.
- 8.5.16 The draft HENPS does not explain why many residents identified by the Government's latest evidence as experiencing significant annoyance would remain ineligible for insulation, compensation or other meaningful mitigation. As a result, there is a clear disconnect between the evidence of effect and the availability of mitigation.

- 8.5.17 The broader concern is that the evidence base has been updated but the mitigation response has not. Whilst Government has commissioned and published a new national evidence base, the practical mitigation and compensation measures remain rooted in historic assumptions regarding the onset of significant community annoyance.

Conclusion

- 8.5.18 The Council considers that the draft Noise Test places too much emphasis on managing aggregate noise contours and too little emphasis on the impacts experienced by individuals and communities.

- 8.5.19 The Government's own evidence demonstrates that significant annoyance occurs at substantially lower noise levels than previously understood, yet the proposed mitigation and compensation package remains largely rooted in historic assumptions. As a result, the draft HENPS provides insufficient assurance that significant adverse effects on health and quality of life will be avoided.

8.5.20 Strengthening the Test

- 8.5.21 The Council considers that the Noise Test should distinguish between:

- strategic noise management through operational and design measures; and
- protection of individuals and communities through receptor-based mitigation and insulation measures.

- 8.5.22 A strengthened Noise Test should demonstrate that:

- i. significant adverse impacts on health and quality of life are avoided;
- ii. adverse impacts are reduced over time;
- iii. newly affected communities are properly protected;
- iv. the benefits of quieter aircraft are shared with communities rather than being used solely to facilitate airport growth;
- v. receptor based mitigation forms part of the core policy framework;
- vi. noise impacts are assessed in the context of the latest ANAS 2023-2024 evidence; and
- vii. both strategic noise controls and community protection measures must be satisfied before the Noise Test can be passed.

- 8.5.23 A strengthened mitigation and compensation package should demonstrate that:

- viii. mitigation thresholds reflect the latest Government evidence on aircraft noise annoyance;

- ix. communities experiencing significant annoyance are not excluded solely because they fall outside historic contour thresholds;
- x. mitigation is designed to achieve recognised internal noise standards and current Government guidance;
- xi. mitigation and compensation packages are tailored to individual receptors and remain appropriate at the point of implementation;
- xii. residential properties, schools, healthcare facilities, community buildings and other sensitive receptors receive protection proportionate to their level of exposure;
- xiii. applicants identify the number of people affected, eligible for mitigation and excluded from assistance; and
- xiv. mitigation delivery is subject to independent monitoring, oversight and enforcement.

8.6 Climate Change

The Test is Not Meaningful

- 8.6.1 The Climate Change Test relies heavily on assumptions regarding future technological developments that are largely outside Heathrow's control. Compliance depends upon sustained improvements in aircraft efficiency, successful large-scale deployment of Sustainable Aviation Fuel (SAF), wider aviation sector decarbonisation and technological advances that have yet to be demonstrated commercially.
- 8.6.2 The draft HENPS largely assumes that these changes will occur rather than testing what happens if they do not.
- 8.6.3 Particular concerns exist regarding future SAF availability. Feedstocks used for SAF are increasingly being sought by other sectors, including energy generation and data centres. As these competing demands increase, assumptions regarding long term SAF availability become increasingly uncertain.
- 8.6.4 A credible Climate Change Test should require expansion to demonstrate compatibility with carbon budgets under pessimistic as well as optimistic scenarios.

The Council's Position

- 8.6.5 The Council's position can be summarised as follows:
 - i. the draft Climate Change Test relies heavily on future technological developments that are largely outside Heathrow's control;
 - ii. many of the measures relied upon remain uncertain in terms of timing, scale and deliverability;

- iii. the draft HENPS gives insufficient consideration to the consequences should those assumptions prove incorrect;
- iv. the test does not adequately demonstrate that Heathrow expansion is compatible with the UK's long-term climate objectives under a range of plausible future scenarios; and
- v. the draft Climate Change Test is capable of being passed without demonstrating that the associated climate risks can be effectively managed.

Conclusion

- 8.6.6 The Council welcomes the greater emphasis placed on climate change within the draft HENPS. However, the proposed Climate Change Test relies heavily on future technological and regulatory developments that remain uncertain and largely outside Heathrow's control.
- 8.6.7 The Council therefore remains unconvinced that Heathrow expansion has been demonstrated to be compatible with the UK's long-term climate commitments. As drafted, the Climate Change Test appears capable of being passed on the basis of assumptions rather than demonstrated outcomes.

Strengthening the Test

- 8.6.8 The Council considers that the Climate Change Test should be strengthened by:
- i. requiring greater transparency and independent scrutiny of assumptions underpinning aviation decarbonisation, including Sustainable Aviation Fuel, carbon removals and emerging technologies;
 - ii. requiring applicants to demonstrate how uncertainty and risk have been considered, including scenarios where technological progress is slower than anticipated;
 - iii. establishing robust monitoring, reporting, governance and periodic review arrangements throughout the operational life of the airport;
 - iv. securing deliverable mitigation measures and contingency mechanisms to address any exceedance of forecast emissions without reliance on uncertain future actions by third parties;
 - v. demonstrating that Heathrow expansion remains compatible with the UK's carbon budgets, net zero objectives and wider climate commitments under a range of plausible future scenarios; and
 - vi. ensuring that the benefits of future emissions reductions contribute towards achieving national climate objectives and are not used solely to facilitate additional aviation growth.

8.7 A Fifth Community Impact Test

The Current Framework Overlooks Community Impacts

- 8.7.1 The draft HENPS is fundamentally flawed in elevating four selected tests, economic growth, climate change, air quality and noise, above all other impacts arising from expansion. The effect is to create a hierarchy of impacts in which matters deemed important by Government become "tests", whilst the impacts experienced by communities become secondary considerations.
- 8.7.2 This approach is inconsistent with the Government's own evidence. The AoS identifies a much broader range of adverse effects arising from expansion, many of which fall directly on the communities surrounding Heathrow. These include impacts on physical and mental health, wellbeing, quality of life, housing, community cohesion, deprivation, access to services, displacement, community severance and the cumulative effects of multiple environmental and social pressures acting together.
- 8.7.3 Despite the significance of these impacts, none has been elevated to the status of a principal test and none provides a clear basis for refusal. As a result, a scheme could satisfy the four headline tests whilst still causing substantial and lasting harm to the communities expected to host it.

The Council's Position

- 8.7.4 The Council's position can be summarised as follows:
- i. the Government's own evidence identifies a broad range of community impacts arising from expansion;
 - ii. many of the most significant impacts fall directly upon communities surrounding Heathrow;
 - iii. none of these impacts has been elevated to the status of a principal test;
 - iv. the draft HENPS provides no clear basis on which expansion could be refused because of community impacts; and
 - v. Heathrow's economic success has not automatically translated into improved outcomes for surrounding communities.
- 8.7.5 The Council therefore strongly recommends the introduction of a **fifth Community Impact Test**.

Evidence from the Draft HENPS and Supporting Assessments

- 8.7.6 The omission of a fifth test is particularly difficult to justify in the case of expansion. Heathrow is one of the world's busiest and most economically successful airports, yet communities surrounding the airport continue to experience significant deprivation and, in some areas, worsening socio-economic outcomes. The existence of the airport has not

automatically translated into local prosperity or reduced inequality. The evidence therefore raises legitimate questions as to whether the communities bearing the greatest impacts of Heathrow's operations receive a fair share of its benefits.

8.7.7 There are currently no meaningful regulatory requirements on Heathrow to deliver local employment outcomes, apprenticeships, local procurement opportunities, supply chain benefits or reductions in deprivation. The draft HENPS largely continues this approach. Communities are expected to accept increased impacts based on promises of future economic benefit, yet there is no mechanism requiring those benefits to reach the communities most affected.

8.7.8 There is also a wider issue of trust. Many local communities view Heathrow as an airport that has been allowed to grow whilst largely self-regulating its impacts. Too often the interests of operational growth have been prioritised over the interests of neighbouring communities. The result is a significant trust deficit between Heathrow and many of the residents expected to accommodate further expansion. Reliance on goodwill is no longer sufficient.

Conclusion

8.7.9 The absence of a Community Impact Test represents a significant gap in the decision-making framework. A nationally significant infrastructure project should not be judged solely on economic outputs, carbon assessments, air quality thresholds and noise contours. It should also be judged on whether it improves or diminishes the lives of the people required to live alongside it.

8.7.10 The Council therefore strongly recommends the introduction of a fifth Community Impact Test. Without one, the draft HENPS is capable of concluding that expansion is acceptable whilst substantial and lasting harm to affected communities remains unresolved.

Strengthening the Framework

8.7.11 A Community Impact Test should therefore require Heathrow to demonstrate measurable and enforceable outcomes in relation to:

- i.** local employment and apprenticeship opportunities;
- ii.** local procurement and supply chain participation;
- iii.** health and wellbeing outcomes;
- iv.** reduction of deprivation and inequality;
- v.** community infrastructure and facilities;
- vi.** protection against displacement and community severance;
- vii.** access to services;
- viii.** community compensation and mitigation;

- ix. identification and delivery of community improvements and betterment opportunities
- x. independent monitoring and reporting; and
- xi. regulatory enforcement where commitments are not achieved.

8.7.12 A Community Impact Test is only meaningful if it carries consequences. Elevating community impacts to the status of a principal test must be matched by a requirement for enforceable outcomes. For too long Heathrow has relied on voluntary commitments, goodwill and self-regulation. The final HENPS should establish a framework that requires airport operators to deliver measurable improvements for host communities, backed by clear obligations, independent oversight and meaningful sanctions where commitments are not met. Communities should not be asked to absorb greater impacts whilst merely hoping benefits will follow. The objective should be clear: expansion should only proceed where it can be demonstrated that affected communities will be left 'better off', not simply 'no worse off if possible'.

8.8 Heathrow Expansion alongside London Plan Growth

Strategic Policy Conflict

- 8.8.1 Heathrow expansion is being promoted as growth infrastructure, yet neither the draft HENPS nor the AoS adequately explain how the airport's growth will coexist with the Mayor of London's growth agenda.
- 8.8.2 The result is two major strategic planning objectives competing for the same land, infrastructure, environmental capacity and public services without any integrated framework demonstrating how both can be delivered. That is not combined strategic planning between central Government and the Mayor of London.

Competition for Land and Infrastructure

- 8.8.3 The Government cannot simultaneously require Hillingdon to accommodate substantial housing and economic growth whilst promoting the expansion of Heathrow without explaining how the two objectives fit together. The Mayor's growth targets are themselves a product of Government policy, yet the draft HENPS provides no strategic framework showing how additional airport infrastructure, increased environmental constraints and significant population growth can be delivered in the same place at the same time. This is not strategic planning and provides an obvious policy conflict.

8.9 Surface Access and Rail Infrastructure

Untested Modal Shift Targets

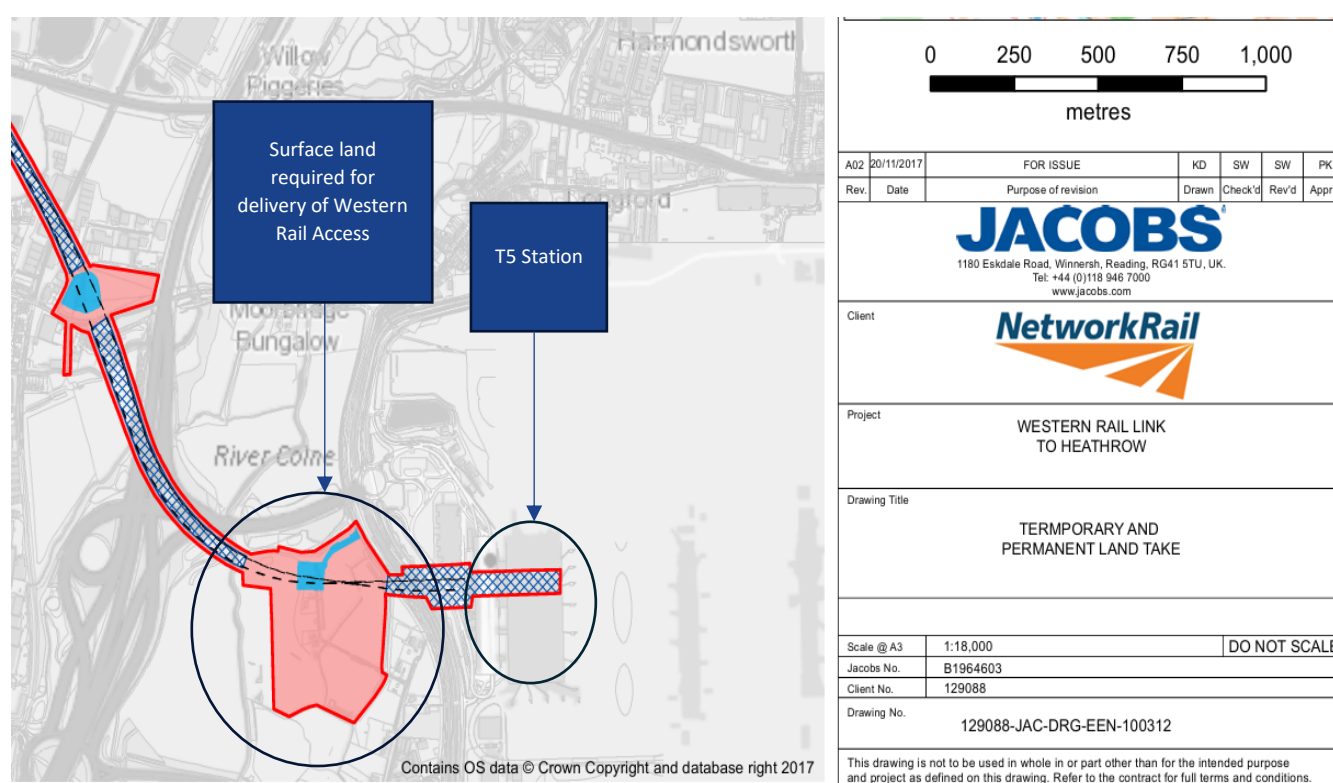
- 8.9.1 The draft HENPS provides untested targets for public transport modal shifts without knowing a) that they are achievable, b) what interventions would be required to deliver

them, or c) what the consequences would be if they are not met. There has been no clear assessment of whether the targets are realistic, nor what measures may ultimately be needed, including potentially punitive charging regimes for private vehicle access to the airport.

- 8.9.2 The accompanying surface access vision acknowledges the importance of rail connectivity and identifies a range of potential interventions, yet there is no committed programme, funding mechanism or delivery strategy in place.

Rail Infrastructure Interdependencies

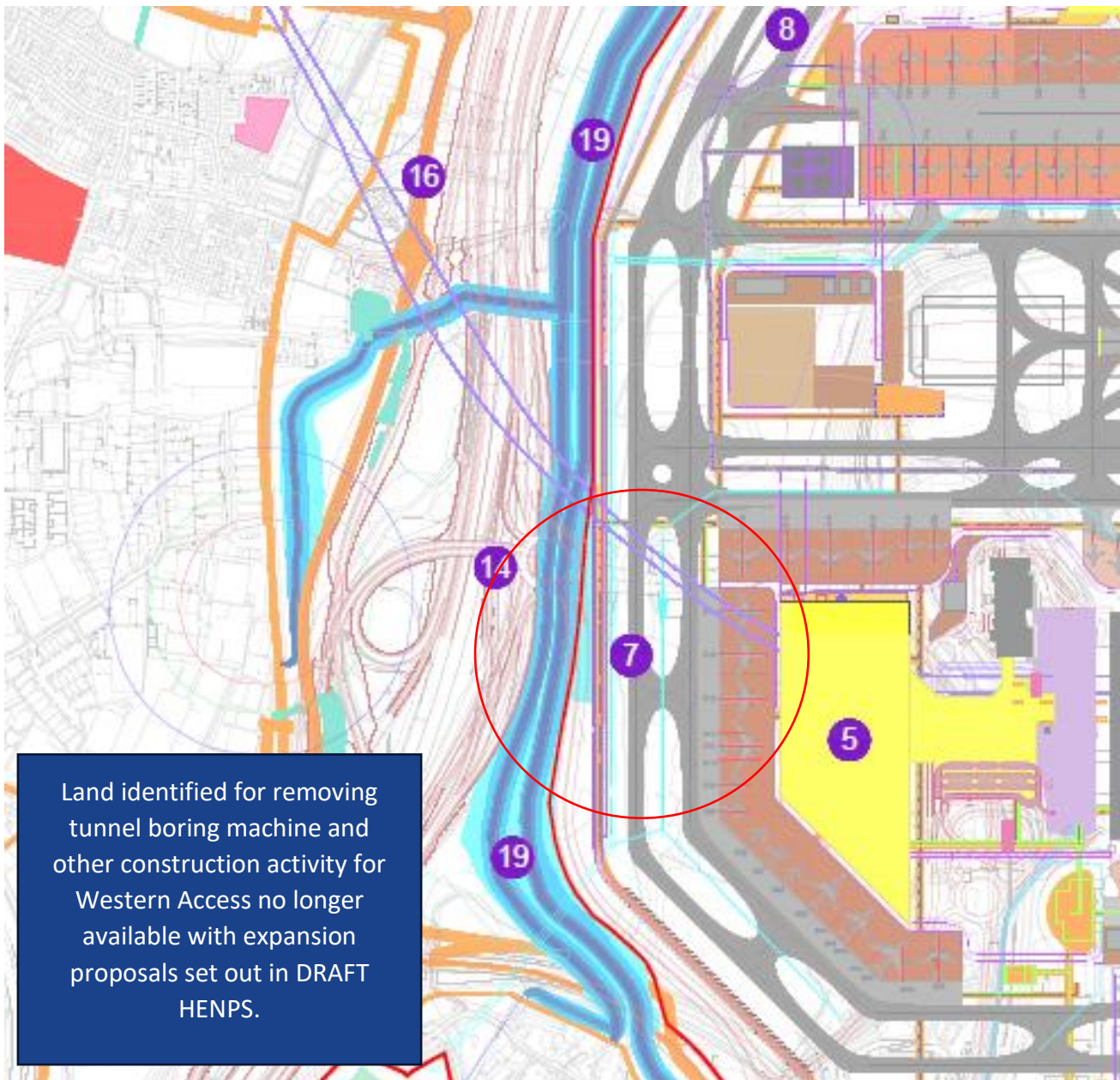
- 8.9.3 The absence of a strategic and integrated transport plan is particularly concerning in relation to Western Rail Access to Heathrow. As shown below, previous proposals for the route relied on safeguarded land between the M25 and Terminal 5 for construction and delivery.



- 8.9.4 As shown on the extract below from the Heathrow Expansion masterplan (Draft HENPS Annex B) The land required for construction outlined above will no longer be available if airport expansion proceeds. The expansion proposal may therefore place a significant impediment to the cost-effective delivery of both Western Rail Access and Southern Rail Access because new runway, taxiway and terminal infrastructure, along with river diversions, would be situated around the safeguarded rail connections at Terminal 5.

- 8.9.5 The expansion proposals would reduce the space available for the shafts, construction compounds and tunnelling works needed to build future rail links, making the delivery of those rail connections more complex, costly and difficult, even where engineering solutions may be available to overcome the resulting constraints.

- 8.9.6 From the information provided, it appears that rail interventions such as Western Rail Access and Southern Rail Access are **necessary and expected** to support Heathrow expansion and facilitate the required modal shift to public transport. This is consistent with the wider surface access vision underpinning the policy framework. However, the draft HENPS does not assess whether these schemes are deliverable and nor does it require an assessment of whether those schemes remain technically deliverable following expansion. Nor does the draft HENPS safeguard rail connections at Terminal 5. This applies equally to both Western Rail Access and Southern Rail Access.



Conclusion

- 8.9.7 There is no clear understanding of what engineering measures, additional infrastructure, cost or complexity may be required to deliver the principal rail schemes expected to facilitate the modal shift on which the expansion case seems to rely upon.

- 8.9.8 The surface access strategy appears to rely on a series of interventions and behavioural changes that are assumed rather than demonstrated. Expansion is dependent upon significant modal shift and enhanced rail connectivity, yet the draft HENPS provides insufficient evidence that these outcomes can be delivered or maintained. Until the necessary infrastructure is shown to be achievable, funded and compatible with airport expansion, the surface access case cannot be regarded as robust.

8.10 Environmental Impact Assessment

Scope

- 8.10.1 The Environmental Impact Assessment should assess not only the airport infrastructure itself, but all ancillary, supporting and interrelated development necessary to enable the expanded airport to function at its intended capacity. This should include, where relevant

- associated hotel accommodation
- All freight and cargo facilities
- logistics and distribution infrastructure
- workforce accommodation and employment land requirements
- utilities
- energy provision
- wider operational infrastructure.

Related and Dependent Development

- 8.10.2 Equally, the assessment should not artificially separate the airport from the infrastructure on which expansion depends. Where surface access measures, rail schemes, highway improvements or other transport interventions are relied upon to justify expansion or mitigate its impacts, they should form part of the assessment.

Phased Runway Proposals

- 8.10.3 Where a phased runway proposal is promoted, the EIA should assess the impacts of the full 3,500 metre runway and associated infrastructure from the outset. A phased approach must not limit understanding of the ultimate development. Local authorities, communities and decision makers require clarity on the full land take, infrastructure requirements and environmental impacts of the completed scheme, not just the initial phase.

- 8.10.4 The EIA should evaluate the full environmental and community consequences of the airport as it would operate in practice, not merely the impacts arising from the runway and terminal infrastructure promoted by an applicant.

8.11 Equalities Impact Assessment

Limits of Strategic Evaluation

- 8.11.1 The Council acknowledges that paragraph 4.48 requires any DCO application to be accompanied by a project level Equality Impact Assessment and that the findings must fall within the limits and parameters of acceptability identified through the Appraisal of Sustainability. However, this requirement raises a number of concerns.
- 8.11.2 Most notably, the draft HENPS does not clearly define what those "limits and parameters of acceptability" are. Whilst the AoS identifies a range of impacts on health, wellbeing, housing, quality of life, community cohesion, access to services and deprivation, it does not establish clear thresholds against which equality impacts can be judged acceptable or unacceptable. As a result, applicants are required to assess impacts against a benchmark that is itself unclear.

Deferral to the DCO Stage

- 8.11.3 The approach also relies heavily on future assessment by the promoter rather than demonstrating that equality issues have already informed the strategic policy. The purpose of the draft HENPS should be to establish a clear framework for decision making. Instead, difficult questions regarding how impacts on vulnerable groups and protected characteristics will be managed are deferred to the DCO stage.

Cumulative Effects

- 8.11.4 There is also a risk that the assessment focuses on individual impacts in isolation. The AoS identifies a broad range of community, health and socio-economic effects associated with expansion, yet the draft HENPS does not require sufficient consideration of their cumulative effect on communities already experiencing deprivation, poor health outcomes and environmental burdens.

Conclusion

- 8.11.5 For a project with such significant and unevenly distributed impacts, it is not sufficient to simply require an EqIA to be produced. The draft HENPS should define what acceptable equality outcomes look like, identify clear limits to adverse impacts, and explain how equality considerations could influence the ultimate decision on whether development consent should be granted.
- 8.11.6 **As drafted, the requirement is stronger on process than on outcomes.**

8.12 Criteria for Good Design for Airports Infrastructure

- 8.12.1 The principle of securing good design is supported, but paragraph 4.55 is far too weak. Rather than establishing clear requirements, it relies on voluntary actions and aspirational language.

*Applicants **should consider** taking independent professional advice on the design aspects of a proposal, from the earliest design stage. A project board level design champion **could** be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Applicants should also commission an independent design review of their proposal prior to planning. The Design Council can provide or signpost recommendations for this service (para 4.55 draft HENPS) [emphasis added]*

- 8.12.2 Applicants are asked to "consider" taking independent advice and a design champion "could be appointed". This is not a policy framework; it is a series of polite suggestions. The quality of design and placemaking should not depend on whether an applicant chooses to engage positively. For a project of this scale, independent design review, design leadership and demonstrable placemaking outcomes should be mandatory requirements, with poor design capable of carrying significant weight in a decision to refuse consent.

8.13 Costs

Affordability from a Public Sector Perspective

- 8.13.1 The affordability provisions within the draft HENPS are disproportionately focused on the costs incurred by the airport operator, airlines and passengers. Whilst the policy requires consideration of airport charges, airline finances and passenger affordability, it contains no equivalent requirement to assess the financial implications for the public sector. An airport operator might be able to afford expansion, but there is no requirement to demonstrate that the public sector can.
- 8.13.2 This is a significant omission. Heathrow is not a self-contained piece of infrastructure. Its operation generates substantial demands on local government, health services, emergency services, transport authorities, environmental regulators and a range of statutory bodies. Expansion would inevitably increase those demands, yet the draft HENPS provides no meaningful framework for identifying, quantifying or mitigating these additional costs. There is no requirement to assess the fiscal implications for local authorities, public health providers, NHS services, police, fire and rescue services, licensing authorities, environmental regulators or transport agencies.

Public Sector Impact Assessment

- 8.13.3 The Council is concerned that the chosen promoter may ultimately recover much of the cost of expansion through airport charges and passenger revenues, whilst a substantial proportion of the wider impacts are transferred to the public purse. The policy therefore assesses affordability from the perspective of the aviation industry whilst largely ignoring affordability from the perspective of taxpayers and public services.
- 8.13.4 The draft HENPS should require applicants to prepare a comprehensive **Public Sector Impact and Cost Assessment** setting out the likely direct, indirect and cumulative burdens arising from both construction and operation. This should include impacts on:
- local authority services and infrastructure;
 - public health and NHS provision;
 - Hillingdon Hospital and wider healthcare capacity;
 - emergency services;
 - environmental monitoring and regulation;
 - planning, licensing and enforcement functions;
 - transport authorities and network management; and
 - any other public body required to support, regulate or respond to the expanded airport.
- 8.13.5 The assessment should identify how these costs will be funded and what mitigation, compensation or support mechanisms will be provided. In the absence of such a requirement, the draft HENPS risks significantly understating the true cost of expansion and fails to demonstrate that the wider public impacts have been properly understood or accounted for.

8.14 Health

Process Rather than Outcomes

- 8.14.1 The Council welcomes the requirement for a project level Health Impact Assessment (HIA) and the recognition that airport expansion can affect physical health, mental health, wellbeing and quality of life. However, the policy is significantly stronger on requiring an assessment to be undertaken than on explaining what health outcomes must actually be achieved.

- 8.14.2 Paragraphs 4.100 to 4.104 recognise a wide range of direct and indirect health effects, but they do not establish any clear thresholds, objectives or circumstances in which health impacts would be considered unacceptable. As with other aspects of the draft HENPS, the policy focuses on process rather than outcomes. The requirement to identify, mitigate and monitor impacts is welcome, but there is no clear framework explaining how the Secretary of State should determine whether the remaining health impacts are acceptable.

Healthcare Capacity

- 8.14.3 The policy also places too much reliance on a future project level assessment. There is no explicit requirement to assess the implications of expansion on local healthcare infrastructure, NHS capacity, public health services or emergency responders. Given the scale of Heathrow and its potential impacts on surrounding communities, these issues should be integral to the assessment rather than left to inference. A stronger policy would require applicants to demonstrate:

- no material deterioration in public health outcomes;
- no unacceptable impacts on healthcare capacity and public health services;
- specific assessment of local NHS providers and emergency services;
- assessment of health inequalities and deprivation;
- assessment of cumulative health burdens; and
- clear health-based criteria capable of influencing whether consent is granted.

Strengthening the Framework

- 8.14.4 Without these requirements, the draft HENPS risks becoming a framework for assessing health impacts rather than determining whether those impacts are acceptable. The Council considers that health should be afforded greater weight within the decision-making framework, particularly given the scale, duration and concentration of impacts on communities surrounding Heathrow.

8.15 Placemaking

Assessment

- 8.15.1 The Council welcomes the inclusion of paragraphs 4.110 to 4.112 within the draft HENPS. The recognition that Heathrow expansion will affect homes, community facilities, local businesses, social networks, community cohesion and quality of life represents an important improvement on previous policy approaches and reflects concerns consistently raised by local authorities and affected communities. These provisions acknowledge that

Heathrow expansion is not simply an infrastructure project, but one that has profound implications for existing communities.

- 8.15.2 However, whilst the identification of these impacts is welcome, the supporting policy framework needs to be stronger. The emphasis is placed on demonstrating engagement with local authorities and showing how impacts have been considered, rather than establishing clear expectations regarding the outcomes that should be achieved.

Strengthening the Policy

- 8.15.3 Given the significance attached to these issues elsewhere in the draft HENPS and the Appraisal of Sustainability, the Council considers there is an opportunity to develop this section further so that it not only recognises the importance of placemaking and community wellbeing, but also provides a more robust framework for securing positive outcomes for affected communities. The policy could be strengthened by requiring applicants to demonstrate:
- i.** that remaining communities will continue to function effectively, supported by agreed community viability assessments and any necessary mitigation, investment or support measures;
 - ii.** that community severance, residential displacement and disruption have been avoided through the design process;
 - iii.** that schools, healthcare, community facilities, local businesses, open space and other essential services will continue to meet community needs in the short to long term;
 - iv.** that access to services, public transport and community infrastructure will be maintained or improved;
 - v.** that the scheme supports local placemaking objectives and contributes positively to community wellbeing and quality of life;
 - vi.** that impacts beyond the Order Limits have been properly assessed and mitigated;
 - vii.** a Community Impact and Legacy Strategy setting out long-term commitments to affected communities; and
 - viii.** that affected communities will be no worse off and, wherever reasonably practicable, demonstrably better off as a result of the development.

9 Assessment of Impacts

9.1 General

Inadequate Assessment Framework

- 9.1.1 Across Chapter 5, the recurring issue is that the AoS frequently identifies significant and, in many cases, major adverse effects, whilst the draft HENPS often responds by requiring assessment, mitigation and monitoring rather than establishing clear policy thresholds, outcomes and decision-making consequences.
- 9.1.2 The result is a framework that is generally stronger at identifying harm than determining whether that harm is acceptable, contrary to the purpose of a National Policy Statement as a decision-making framework

Competing Promoters

- 9.1.3 The Council is concerned that the draft HENPS establishes neither sufficiently clear assessment criteria nor sufficiently prescriptive assessment methodologies. This is particularly problematic given that the policy is intended to provide the framework within which competing promoters may bring forward rival proposals.
- 9.1.4 In the absence of clear standards and common assessment requirements, promoters may prepare evidence using different methodologies, assumptions, metrics and significance criteria. This risks undermining comparability between proposals and could lead to materially different conclusions being drawn from the same underlying issues.
- 9.1.5 The draft HENPS should provide greater consistency and direction to ensure that proposals are assessed on a common basis and against common standards, thereby enabling transparent and robust decision making.

9.2 Air Quality

Summary

- 9.2.1 The Council welcomes the strengthening of the draft HENPS compared with the 2018 Airports National Policy Statement. In particular, the Council supports the incorporation of the Environment Act 2021, recognition of PM_{2.5} population exposure as a statutory consideration, the introduction of the Government's revised air quality test and the acknowledgement of emerging pollutants such as ultrafine particles (UFPs).
- 9.2.2 Notwithstanding these improvements, the Council does not agree that the proposed mitigation measures have yet been demonstrated to be deliverable, effective and proportionate. The Government's own evidence identifies continued uncertainty regarding future outcomes and concludes that Heathrow expansion is expected to give rise to major adverse air quality effects compared with a no-expansion scenario, with

successful outcomes dependent upon mitigation measures whose effectiveness and deliverability have yet to be fully demonstrated.

- 9.2.3 The draft HENPS provides no convincing answer. Whilst the Government has updated its policy framework to reflect recent legislative changes, the proposed air quality test remains focused on demonstrating compliance with current statutory obligations. As a result, the policy risks authorising infrastructure intended to operate well beyond 2050 without demonstrating compatibility with the foreseeable tightening of air quality standards or the long-term objective of reducing population exposure to harmful pollutants.

Background

- 9.2.4 The Council agrees that air quality is likely to remain one of the principal environmental issues arising from Heathrow expansion. The airport is located within a densely populated urban environment, surrounded by established residential communities, schools, healthcare facilities and major transport corridors. Many communities surrounding the airport already experience elevated exposure to transport-related pollutants and remain within designated Air Quality Management Areas.
- 9.2.5 The Council welcomes the revised draft HENPS air quality framework, particularly the incorporation of the Environment Act 2021, the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 and the recognition that PM_{2.5} population exposure has become an important statutory consideration.
- 9.2.6 The Council also supports the introduction of the revised Government air quality test, requiring that airport expansion should not:
- create new breaches of statutory air quality obligations;
 - materially worsen existing breaches; or
 - hinder the achievement of PM_{2.5} environmental targets.
- 9.2.7 However, the Council considers that compliance with current legal obligations should represent the minimum legal requirement rather than the principal benchmark for determining the acceptability of infrastructure expected to remain operational throughout the second half of this century.

Concerns with the Assessment Requirement

- 9.2.8 The Council is concerned that the policy framework places significant reliance on future improvements in vehicle emissions, aircraft technology, public transport usage and wider decarbonisation trends. Many of these factors sit outside an airport operator's direct control and therefore cannot be secured through the policy, consequently they should not be relied upon.

- 9.2.9 The supporting assessments acknowledge that successful outcomes depend upon behavioural change, technological improvements, background emissions reductions and delivery of transport infrastructure by third parties. This introduces uncertainty regarding both the deliverability of mitigation and the achievement of forecast air quality outcomes.
- 9.2.10 In addition, insufficient weight is given to population exposure and community health outcomes. Current legal compliance does not necessarily indicate that communities are protected from the health effects associated with long-term exposure to air pollution, particularly where concentrations remain above levels regarded by public health authorities as desirable.
- 9.2.11 The supporting assessments identify continuing risks along major transport corridors and recognise that local authorities are seeking concentrations substantially closer to World Health Organisation guideline values. Nevertheless, the assessment framework does not clearly demonstrate how expansion will contribute towards those longer-term objectives.
- 9.2.12 There is insufficient clarity regarding the treatment of local air quality hotspots, particularly within existing Air Quality Management Areas. The framework should more clearly distinguish between demonstrating legal compliance and protecting communities already experiencing elevated pollutant exposure.
- 9.2.13 Whilst the revised draft HENPS introduces consideration of ultrafine particles, the supporting evidence acknowledges increasing concern regarding health impacts and continuing uncertainty regarding exposure. The policy currently relies heavily on monitoring despite recognising significant evidence gaps, yet monitoring requirements are not matched by clearly defined intervention thresholds, mitigation triggers or enforcement mechanisms.
- 9.2.14 Surface access remains the greatest source of uncertainty within the operational assessment. The draft HENPS assumes significant modal shift and reductions in vehicle emissions but provides limited assurance regarding how these assumptions will be secured over the operational life of the airport.
- 9.2.15 Finally, the draft HENPS does not provide sufficiently clear assessment standards or methodologies for what is effectively a competitive process between alternative promoters. The absence of common assessment requirements creates a risk that future proposals could rely upon different assumptions, methodologies and standards whilst each claiming policy compliance, reducing transparency and making meaningful comparison between proposals more difficult.

Proposed Mitigation

- 9.2.16 The Council does not consider that the proposed mitigation package has yet been demonstrated to be fully deliverable. Many of the principal mitigation measures depend upon factors outside the airport operator's direct control, including:
- achieving ambitious public transport mode share targets;

- reducing airport-related highway traffic;
- delivery of rail projects and wider transport infrastructure;
- continuing decarbonisation of the vehicle fleet;
- behavioural changes by passengers and employees; and
- actions undertaken by neighbouring authorities and transport providers.

9.2.17 The Government's own assessments acknowledge that successful outcomes depend upon these assumptions being realised. Consequently, the proposed mitigation package cannot currently be regarded as demonstrably deliverable.

9.2.18 The Council is similarly concerned that the effectiveness of the mitigation package has not yet been demonstrated. Expansion would introduce substantial increases in aircraft activity, associated transport movements and construction emissions. Although future background emissions are expected to fall, Heathrow expansion still results in higher emissions than the no-expansion baseline.

9.2.19 The Government's own Appraisal of Sustainability concludes that Heathrow expansion is expected to give rise to major adverse air quality effects compared with a no-expansion scenario and identifies a continuing reliance on mitigation measures to offset those impacts.

9.2.20 The Health Impact Analysis identifies major adverse health effects for certain population groups and concludes that residual health impacts remain even after accounting for future emissions improvements.

The Air Quality Test Remains Too Narrow

9.2.21 The principal weakness of the revised draft HENPS is that the decision-making test remains centred upon compliance with current statutory obligations.

9.2.22 Whilst avoiding legal breaches is clearly necessary, this should not be regarded as sufficient for infrastructure intended to operate well beyond 2050.

9.2.23 Scientific understanding of air pollution continues to evolve. The World Health Organisation's 2021 Air Quality Guidelines and the European Union's revised Ambient Air Quality Directive demonstrate a clear policy direction towards lower pollutant concentrations and greater protection of public health.

9.2.24 Consequently, concentrations that comply fully with current UK legislation may nevertheless exceed future legal standards and remain substantially above levels regarded by public health authorities as appropriate for protecting human health.

9.2.25 The Council therefore considers that legal compliance and protection of public health are not synonymous.

9.2.26 For infrastructure intended to remain operational throughout the second half of this century, the assessment should demonstrate not only compliance with existing legislation but also compatibility with the foreseeable direction of environmental and public health policy.

Deliverability, Monitoring and Adaptive Management

9.2.27 The Council welcomes the proposed monitoring requirements. However, monitoring alone does not reduce emissions or protect public health.

9.2.28 The draft HENPS currently provides limited assurance regarding how deviations from forecast outcomes will be addressed.

9.2.29 Without clearly defined performance indicators, intervention thresholds, mitigation triggers and enforcement mechanisms, the Council cannot conclude that the adaptive management framework will be effective throughout the operational life of the development.

9.2.30 Monitoring should therefore be linked directly to enforceable mitigation requirements, ensuring that additional measures are automatically introduced where air quality outcomes prove materially worse than forecast.

How the Policy Could Be Strengthened

9.2.31 The Council considers that the air quality framework should be strengthened by:

- i. greater emphasis on protection of public health and population exposure alongside compliance with statutory air quality limits;
- ii. a clear distinction between legal compliance and the achievement of health protective air quality outcomes, informed by the latest scientific evidence and public health guidance;
- iii. greater transparency regarding modelling assumptions, baseline scenarios, forecast emissions reductions and key assessment uncertainties;
- iv. assessment of population exposure, air quality hotspots, Air Quality Management Areas and the combined effects of aircraft, surface access and other airport related emissions sources;
- v. a precautionary approach to ultrafine particles, supported by baseline monitoring, ongoing assessment and adaptive mitigation measures;
- vi. independent review, monitoring, reporting and governance arrangements throughout construction and operation; and

- vii. mitigation measures that are secured before significant impacts occur, with technological improvements and emissions reductions delivering tangible benefits for affected communities rather than solely facilitating additional airport growth.

9.3 Noise

Summary

9.3.1 The Council considers that the current assessment requirements are stronger on measuring and forecasting aircraft noise than on demonstrating how significant adverse impacts on health and quality of life will be avoided. The chapter would benefit from greater transparency, stronger alignment with current evidence, a clearer distinction between strategic noise management and community protection, and a much more robust approach to receptor-based mitigation.

9.3.2 The central question for the Government is straightforward:

if the Aviation Noise Attitudes Survey 2023-2024 demonstrates that substantial community annoyance now occurs at around 43 dB LAeq,16h, and that people are significantly more sensitive to aircraft noise than previously understood, why does the draft HENPS continue to rely on mitigation and compensation thresholds principally centred on 57 dB and 60 dB LAeq,16h?

9.3.3 The draft HENPS provides no convincing answer. Whilst the Government has updated its understanding of aircraft noise impacts, it has largely retained a mitigation package rooted in historic assumptions regarding the onset of significant community annoyance. The policy appears to adopt mitigation thresholds and compensation measures that originated in promoter-led proposals, yet provides little evidence that those measures have been independently reassessed against the Government's latest evidence. As a result, the policy risks authorising Heathrow expansion on the basis of a mitigation framework that excludes a substantial proportion of those whom the Government's own evidence identifies as adversely affected by aircraft noise.

Background

9.3.4 The Council agrees that aviation noise is likely to be one of the principal environmental issues arising from Heathrow expansion and should therefore be the primary focus of the noise assessment framework. Whilst construction noise, surface access noise and fixed plant noise are important considerations, these impacts are common to many nationally significant infrastructure projects and are already supported by established regulations, guidance and assessment methodologies. Aviation noise is fundamentally different and should be treated as the dominant issue within the chapter.

9.3.5 The Council also considers that the assessment framework should be more explicitly structured around the Noise Policy Statement for England, namely:

- avoiding significant adverse impacts on health and quality of life;
- mitigating and minimising adverse impacts on health and quality of life; and
- where possible contributing to improvements in health and quality of life.

Concerns with the Assessment Requirement

9.3.6 The assessment framework does not consistently distinguish aviation noise from other noise sources. This risks diluting consideration of what is likely to be the principal environmental impact of Heathrow expansion.

9.3.7 There is insufficient clarity regarding the evidence base underpinning the assessment framework. In several areas the policy appears less certain than the 2018 ANPS and it is not always clear how more recent evidence, including the Aviation Noise Attitudes Survey 2023-2024, has informed the assessment approach, mitigation measures or thresholds.

9.3.8 The policy places significant reliance on noise forecasting and assumptions regarding future aircraft performance yet provides limited transparency regarding those assumptions. Without greater clarity there is little opportunity for independent verification, increasing the risk of mistrust in forecasting outcomes and policy compliance conclusions.

9.3.9 The assessment framework relies heavily on contour-based metrics. Whilst contour areas are useful strategic indicators, they are not direct measures of annoyance, health effects or quality of life. There is a risk that maintaining an overall contour area could be treated as evidence that impacts are acceptable even where significant adverse effects remain at individual receptors or within individual communities.

9.3.10 There is insufficient clarity regarding how aircraft ground noise, including taxiing aircraft and other airport operations, is to be assessed and combined with airborne aircraft noise. This is particularly important for communities closest to the airport where multiple aviation noise sources may contribute to overall impacts.

9.3.11 The sections dealing with noise envelopes, benefit sharing and future noise management arrangements provide limited detail regarding governance, accountability and independent oversight. As drafted, it is difficult to understand how communities can have confidence in these arrangements over the long term.

9.3.12 The approach to receptor-based mitigation is underdeveloped. Current references to insulation and financial contributions appear largely based on historic policy and do not clearly demonstrate how more recent evidence regarding aircraft noise annoyance has been incorporated. The framework also provides greater certainty to the promoter than to affected communities regarding the long-term suitability of homes and community facilities exposed to aircraft noise.

- 9.3.13 Finally, the policy's reliance on mitigation being delivered "as soon as reasonably practicable" introduces unnecessary uncertainty. Where significant impacts can be predicted in advance through modelling, mitigation measures should be identified, agreed and secured before those impacts occur.

Proposed Mitigation

- 9.3.14 The Council is concerned that the proposed noise mitigation and compensation package is not aligned with the Government's latest evidence regarding the effects of aircraft noise on communities. The Aviation Noise Attitudes Survey 2023-2024 (ANAS), commissioned by Government specifically to inform future policy thresholds and metrics, demonstrates that community annoyance now occurs at substantially lower noise exposures than previously assumed.
- 9.3.15 ANAS found that approximately 10% of the population are highly annoyed at around 43 dB LAeq,16h, compared with approximately 54 dB LAeq,16h in the earlier SoNA 2014 survey. The study further concludes that annoyance levels are higher than those identified by SoNA 2014 at all noise exposures examined.
- 9.3.16 The significance of this finding cannot be overstated. The Government's own evidence now demonstrates that substantial numbers of people experience significant adverse effects from aircraft noise at levels materially below those at which mitigation and compensation measures become available.

The £3,000 Contribution Appears Arbitrary

- 9.3.17 The draft HENPS proposes a contribution of up to £3,000 for acoustic insulation for properties within specified noise contours. However, neither the draft HENPS nor its supporting evidence clearly explains why £3,000 remains an appropriate figure in light of current evidence regarding noise effects, modern construction costs or the characteristics of individual properties.
- 9.3.18 The approach appears to prioritise certainty of cost to the promoter rather than certainty of outcome for affected residents.
- 9.3.19 The draft HENPS continues to rely on a £3,000 residential noise insulation contribution despite Heathrow having used the same figure in earlier proposals from 2024. No evidence is provided to explain why this amount remains appropriate in light of current evidence, modern construction costs or the likely timeframe for implementation. The figure appears to originate from promoter proposals rather than independent assessment and provides certainty of cost to the airport rather than certainty of outcome for affected residents.
- 9.3.20 Furthermore, a fixed financial contribution bears little relationship to:
- the level of noise exposure experienced;
 - the effectiveness of the works required;

- the age and construction of the property;
- occupancy characteristics;
- whether windows can realistically remain closed throughout the year; or
- whether acceptable internal noise conditions can actually be achieved.

The 60 dB Threshold Is Increasingly Difficult to Defend

9.3.21 The most striking issue is the continued reliance on a 60 dB LAeq,16h threshold for full acoustic insulation. That approach may have been understandable when the Government's evidence suggested that significant community annoyance began at considerably higher levels. However, ANAS fundamentally changes that position. Government's latest evidence shows:

- approximately 10% highly annoyed at 43 dB LAeq,16h;
- approximately 20% highly annoyed at around 50 dB LAeq,16h; and
- rapidly increasing annoyance thereafter.

9.3.22 The policy consequence is clear:

- the threshold for substantial mitigation is being triggered at a point where a very large proportion of those adversely affected by aircraft noise have already been excluded from assistance.
- The draft HENPS does not explain why a property exposed to 59 dB should receive no entitlement to full insulation whilst a property exposed to 60 dB should.
- Nor does it explain why the principal mitigation thresholds have not been reviewed to reflect the findings of ANAS, notwithstanding that ANAS was commissioned precisely to inform future policy development.

Many Highly Affected Residents Will Receive Nothing

9.3.23 The ANAS evidence demonstrates that people are now reporting high annoyance at levels well below both the insulation threshold and, in many cases, below the thresholds associated with the proposed compensation package. Consequently, there is a large category of residents who:

- experience aircraft noise;
- are regarded by the Government's latest evidence as highly annoyed by that noise;

- may suffer adverse effects on health and quality of life;
- but receive no insulation, no compensation and no other meaningful mitigation.

9.3.24 As a result, many residents identified by the Government's own evidence as experiencing significant annoyance would remain ineligible for insulation, compensation or other meaningful mitigation.

Out of Date Evidence Base

9.3.25 The broader concern is that the draft HENPS updates the evidence base but does not update the mitigation response. The Aviation Noise Attitudes Survey 2023-2024 (ANAS), commissioned by the Government to inform future aviation noise policy, demonstrates a substantial increase in community sensitivity to aircraft noise compared with earlier studies.

9.3.26 The proposed mitigation and compensation package therefore remains largely rooted in historic assumptions regarding the onset of significant community annoyance.

How the Policy Could Be Strengthened: Assessing Noise

- i. place aviation noise at the centre of the assessment framework, supported by separate assessments of aircraft, construction, surface access and operational noise;
- ii. align the assessment framework with the objectives of the Noise Policy Statement for England and the latest evidence on aircraft noise annoyance, including ANAS 2023-2024;
- iii. improve transparency regarding forecasting assumptions, baseline scenarios, modelling methodologies and the relationship between noise metrics, health effects and quality of life outcomes;
- iv. assess impacts at both community and receptor level, including the combined effects of airborne aircraft noise, ground operations and associated airport activity;
- v. establish a stronger framework for noise envelopes, governance, monitoring, independent oversight and community accountability;
- vi. require a comprehensive receptor-based mitigation and compensation strategy that is proportionate to exposure, delivered before significant impacts occur and remains appropriate at the point of implementation; and
- vii. ensure the benefits of quieter aircraft are shared with communities through reduced noise exposure, and require both strategic noise controls and receptor-based mitigation measures to be satisfied before the overall noise test can be passed.

How the Policy Could Be Strengthened: Mitigation

- i. reflect the latest Government evidence on aircraft noise annoyance and avoid reliance on historic contour thresholds alone;
- ii. provide protection proportionate to the level of exposure experienced by individual receptors;
- iii. deliver acoustic mitigation that achieves recognised internal noise standards;
- iv. ensure compensation and insulation packages remain sufficient at the point of delivery;
- v. be independently monitored and regulated to provide confidence that mitigation is delivered effectively and consistently; and
- vi. ensure affected communities receive meaningful mitigation before significant impacts occur.

9.4 Climate Change Mitigation

Summary

- 9.4.1 The Council supports the strengthening of climate change policy within the draft HENPS compared with the 2018 Airports National Policy Statement and welcomes the greater emphasis placed on carbon emissions, carbon budgets and the UK's net zero commitments.
- 9.4.2 However, the Council is not convinced that the draft HENPS demonstrates that Heathrow expansion can be delivered consistently with the UK's legally binding climate objectives. The policy continues to rely heavily upon future technological improvements, sustainable aviation fuels, carbon removals and aircraft efficiency gains, many of which remain uncertain in terms of timing, deliverability and scale.
- 9.4.3 A fundamental question therefore arises as to whether infrastructure designed to facilitate significant growth in aviation activity can be regarded as compatible with the UK's long-term climate commitments when the majority of emissions reductions required to justify that growth have yet to be demonstrated at commercial scale.
- 9.4.4 The draft HENPS provides no convincing answer. Whilst recognising the challenge of decarbonising aviation, the policy largely assumes that future technological and market developments will resolve that challenge. As a result, the policy risks authorising substantial additional aviation capacity before there is sufficient certainty that the associated climate impacts can be mitigated within the UK's wider carbon reduction framework.

Background

- 9.4.5 The Council recognises that the climate policy framework has changed significantly since publication of the 2018 ANPS. The Climate Change Act now commits the UK to achieving net zero greenhouse gas emissions by 2050 and national carbon budgets have become progressively more demanding.
- 9.4.6 The Council welcomes the inclusion of updated climate evidence and acknowledges the Government's commitment to ensuring that aviation contributes towards achieving national climate objectives.
- 9.4.7 However, Heathrow expansion would represent a long-term infrastructure commitment extending well beyond 2050. The Council therefore considers that the assessment framework should not simply demonstrate compliance with current policy, but also demonstrate resilience to future climate obligations over the full operational life of the development.

Concerns with the Assessment Requirement

- 9.4.8 The assessment framework relies heavily on assumptions regarding future aviation decarbonisation technologies, including Sustainable Aviation Fuel, aircraft efficiency improvements, low-carbon propulsion systems and greenhouse gas removals. Many of these measures remain uncertain in terms of timing, availability, affordability and effectiveness when deployed at the scale required to support continued aviation growth.
- 9.4.9 The assessment places considerable reliance on industry-wide and national emissions reductions rather than measures directly controlled by the airport operator.
- 9.4.10 The framework also focuses principally on demonstrating compatibility with national carbon budgets at a strategic level. Whilst important, this does not necessarily demonstrate that Heathrow expansion represents the most appropriate or efficient use of the UK's remaining carbon capacity.
- 9.4.11 There is insufficient clarity regarding the consequences should anticipated technological improvements fail to materialise, be delayed or deliver smaller reductions than forecast. The assessment places greater emphasis on forecasting future emissions reductions than on demonstrating how climate risks would be managed if those reductions are not achieved.

Proposed Mitigation

- 9.4.12 The proposed mitigation package relies heavily upon future technological change and sector-wide decarbonisation measures rather than direct controls on aviation growth or emissions.
- 9.4.13 Many of the assumptions underpinning the climate case for expansion sit outside airport operator's control, including:
- the availability of sustainable aviation fuels at scale;

- future aircraft technology improvements;
- carbon capture and greenhouse gas removal technologies;
- national and international aviation decarbonisation policies;
- market responses by airlines and passengers; and
- future regulatory interventions.

9.4.14 The Council is therefore concerned that the climate mitigation package is dependent upon a range of external factors that are not fully secured and may not develop as currently anticipated.

Deliverability, Monitoring and Adaptive Management

9.4.15 The Council welcomes the proposed monitoring and reporting requirements. However, monitoring emissions alone does not reduce climate impacts.

9.4.16 The draft HENPS currently provides limited clarity regarding what corrective action would be required should aviation emissions exceed forecast levels or should anticipated decarbonisation measures fail to materialise.

9.4.17 Without clearly defined intervention mechanisms, mitigation triggers and review processes, the Council cannot conclude that the adaptive management framework will be effective throughout the operational life of the development.

How the Policy Could Be Strengthened

9.4.18 The Council considers that the climate change framework should be strengthened by:

- i. requiring greater transparency and independent scrutiny of assumptions underpinning aviation decarbonisation, including sustainable aviation fuels, carbon removals and emerging technologies;
- ii. demonstrating how uncertainty, risk and alternative scenarios have been assessed, including circumstances where technological progress is slower than anticipated;
- iii. establishing robust monitoring, reporting, governance and periodic review arrangements throughout the operational life of the airport;
- iv. securing deliverable mitigation measures and contingency mechanisms to address any exceedance of forecast emissions, without reliance on uncertain future actions by third parties;
- v. demonstrating that Heathrow expansion remains compatible with the UK's carbon budgets, net zero objectives and wider climate commitments under a range of plausible future scenarios; and

- vi. ensuring that the benefits of future emissions reductions contribute to achieving national climate objectives and are not used solely to facilitate additional aviation growth.

9.5 Economic Growth Across the Country

Background

- 9.5.1 The Government's stated objective is that Heathrow expansion should generate economic growth across the UK through enhanced international connectivity, strengthened domestic connections, and increased trade and investment opportunities. The draft HENPS places considerable weight on this proposition and references assessments indicating potentially significant national economic benefits.
- 9.5.2 The Council does not dispute that Heathrow is an important national economic asset or that additional capacity may generate economic activity. However, the Council considers that there is a fundamental distinction between demonstrating that economic benefits may arise in aggregate and demonstrating that those benefits will be distributed in a manner consistent with the Government's stated policy objectives.

Concerns with the Assessment Requirements: National

- 9.5.3 Given the lack of clarity around the economic case, the Council considers that the assessment framework is insufficiently developed to support the conclusions reached within the draft HENPS.
- 9.5.4 Most significantly, the policy assumes that Heathrow expansion will support economic growth across the country but does not establish a robust framework for demonstrating that outcome. Whilst the supporting evidence identifies potential economic benefits, there remains considerable uncertainty regarding where those benefits will occur, who will benefit from them, and whether they represent genuinely additional growth rather than the relocation of economic activity from other parts of the UK.
- 9.5.5 In effect, the current position appears to be:
 - The Government Proposition is that expansion will deliver benefits across the country;
 - The evidence doesn't prove it;
 - The assessment criteria are therefore vague
 - Applicants are not required to demonstrate anything specific
 - Decision makers don't know how to judge success.

- 9.5.6 The Council's primary concern is that the assessment framework appears to rely on the expectation that applicants will produce evidence supporting the pre-existing proposition that Heathrow expansion will deliver nationwide economic growth, rather than establishing a robust and objective framework for testing whether that outcome is likely to be achieved in practice.

Concerns with the Assessment Requirements: Local

- 9.5.7 The absence of a robust national assessment is compounded by the absence of any requirement to demonstrate success at the local level.
- 9.5.8 The communities most affected by Heathrow expansion will bear the greatest adverse impacts associated with development and airport operations. Despite this, there is no clear requirement for applicants to demonstrate how economic benefits will be shared with those communities, nor is there a meaningful framework for assessing whether local prosperity outcomes are actually achieved.
- 9.5.9 This omission is particularly striking given Heathrow's role within the local economy. Previous expansion through Terminal 5 was accompanied by expectations of substantial local economic benefits. However, the draft HENPS and AoS provide no robust assessment of whether those benefits were realised, who benefited from them, or what lessons should be learned before further expansion is considered. In simple terms, the baseline impact of Heathrow on the local economy has not been established.
- 9.5.10 Indeed, available socioeconomic evidence indicates that some communities surrounding the airport continue to experience significant deprivation and economic challenges despite their proximity to one of the UK's largest economic assets. This raises legitimate questions regarding the degree to which airport growth automatically translates into improved outcomes for local residents and businesses.
- 9.5.11 Similarly, whilst substantial employment benefits are claimed, there is insufficient information regarding:
- the quality of employment opportunities created;
 - salary levels and career progression opportunities;
 - the proportion of jobs likely to be secured by local residents;
 - the accessibility of opportunities to disadvantaged communities;
 - the distribution of procurement spend;
 - local supply chain participation; and
 - the extent to which airport expenditure supports local businesses.

- 9.5.12 Without this analysis, it is difficult to conclude that economic benefits will flow meaningfully to local communities rather than being captured elsewhere through wider regional, national or international labour and supply markets.

Concerns with the Assessment Requirements: Cumulative National and Local Growth

- 9.5.13 The Council is concerned that the assessment criteria are so vague that economic benefits can be diverted away from the communities most affected by Heathrow's impacts in order to satisfy broader claims of national growth. The emphasis on demonstrating UK-wide economic benefits creates a risk that success is measured through national outcomes, whilst overlooking whether local communities actually share in the prosperity generated by expansion.
- 9.5.14 This creates a risk on two fronts. Expansion could draw additional investment and economic activity towards London and the South East at the expense of other regions, whilst also allowing benefits to flow elsewhere rather than to the communities bearing the greatest impacts of the airport. As drafted, the framework provides no clear assurance that those most affected by expansion will be amongst its primary beneficiaries.

Concerns Regarding Mitigation and Benefit Sharing

- 9.5.15 The Council considers that the draft HENPS places insufficient emphasis on ensuring that economic benefits are shared fairly with those communities experiencing the greatest impacts from expansion.
- 9.5.16 The current approach relies heavily on the assumption that economic benefits will naturally diffuse through the economy without providing mechanisms to ensure this occurs. There are no clearly defined expectations regarding local employment outcomes, local procurement, skills development, apprenticeship opportunities, business support initiatives or other measures that could help ensure affected communities share directly in the benefits arising from expansion.
- 9.5.17 Consequently, there is a risk that economic gains are realised at a national level whilst local communities continue to experience adverse environmental and social impacts without receiving a proportionate share of the associated prosperity.
- 9.5.18 The Council considers this to be a significant omission. If expansion is to be justified partly on the basis of economic growth, there should be a corresponding obligation to demonstrate how that growth will support the communities most affected by the development. Economic benefits should not simply be assumed; they should be secured, measurable and capable of enforcement.
- 9.5.19 The experience of Heathrow's existing operation suggests that economic activity alone does not necessarily result in improved socioeconomic outcomes for surrounding communities. The draft HENPS should therefore move beyond high level assumptions and require demonstrable evidence of how future growth will generate meaningful improvements in local economic wellbeing.

How the Policy Should be Strengthened

9.5.20 The Council considers that the economic chapter should be strengthened through the introduction of clearer policy objectives, introducing the need for a local assessment, more robust assessment requirements and enforceable economic outcomes. In particular, applicants should be required to:

- i. provide a robust baseline assessment of the airport's current economic contribution and influence at local, regional and national levels, including employment, supply chains and the socioeconomic conditions of affected communities;
- ii. demonstrate how the benefits of expansion will be distributed nationally, regionally and locally, including the geographic areas expected to benefit and the mechanisms through which those benefits will be realised;
- iii. distinguish between genuinely additional economic growth and the redistribution of economic activity, including assessment of the potential for increased economic concentration within London and the Southeast;
- iv. provide a detailed assessment of how communities most directly affected by expansion will benefit from economic growth, including employment, skills, apprenticeships, local procurement and business opportunities;
- v. establish clear, measurable and enforceable commitments for employment, skills, local supply chain participation and wider economic outcomes;
- vi. provide a monitoring and reporting framework against which economic outcomes can be measured throughout the operational life of the airport;
- vii. demonstrate that communities experiencing the greatest adverse impacts from expansion will be amongst the primary beneficiaries of the economic opportunities generated by the development; and
- viii. ensure the preferred promoter establishes a permanent Business and Local Economy Fund (akin to that used on HS2) to secure a lasting economic legacy for communities affected by expansion. The fund should operate throughout both the construction and operational phases of the airport and support local businesses, employment, skills, training, regeneration and supply chain participation.

9.6 Surface Access

Background

9.6.1 The draft HENPS recognises that Heathrow expansion will require substantial surface access improvements to accommodate additional passengers and workers, with a strong reliance on public transport and mode shift. Given the close relationship between transport, economic growth, climate change, air quality and community wellbeing, the Council considers that surface access is fundamental to determining whether expansion can be accommodated sustainably.

- 9.6.2 The Council therefore expects that the policy should establish a clear principle that Heathrow expansion must not proceed on the basis that transport constraints will be assessed and resolved at a later date. Applicants should be required to demonstrate how surface access requirements will be delivered, funded, monitored and enforced before expansion is permitted, rather than relying on future assumptions regarding infrastructure delivery or behavioural change.
- 9.6.3 As presented, the policy relies heavily on plans, strategies and future commitments, yet provides few clear or measurable outcomes beyond the aspiration of 'public transport first'.
- 9.6.4 Capacity at Heathrow following the T5 decision was released regardless of the surface access impacts. This provides little incentive for the Airport Operators to make year on year improvements. The Council therefore believes capacity at Heathrow should be intrinsically linked to the modal shift targets identified.

Concerns with the Assessment Requirement

- 9.6.5 The Council is concerned that the assessment framework lacks sufficient clarity regarding the outcomes applicants are expected to achieve and the evidence required to demonstrate that those outcomes will be delivered.
- 9.6.6 The draft HENPS appears to proceed on the basis that future transport improvements, increased public transport use and behavioural change will accommodate the additional demand generated by expansion. However, the framework does not provide sufficient certainty regarding how this will be achieved, what level of performance is required, or what should happen if anticipated improvements fail to materialise.
- 9.6.7 The Council is also concerned that the assessment framework focuses predominantly on strategic transport outcomes whilst giving insufficient consideration to local impacts. Whilst headline passenger numbers, mode share targets and network performance are assessed, there is far less emphasis on congestion, journey reliability, severance, pressure on local infrastructure and wider effects on quality of life experienced by surrounding communities. As a result, the framework provides limited clarity regarding what applicants must demonstrate, what constitutes an acceptable outcome and how national, regional and local impacts should be balanced.

Mode Share Targets Should Not Be Achieved at the Expense of Wider Transport Users

- 9.6.8 The Council is concerned that the draft HENPS places undue emphasis on Heathrow achieving public transport mode share targets without adequately considering the consequences for the wider transport network. Meeting airport-specific targets cannot be regarded as a success if it is achieved by consuming capacity that was intended to support wider housing growth, economic development and modal shift objectives across London and the Southeast.
- 9.6.9 The assessment should recognise that public transport capacity is not solely available to serve Heathrow. There is a real risk that airport growth absorbs a disproportionate share

of available network capacity, forcing other users, businesses and communities onto already congested roads or constraining growth elsewhere. The key question is therefore not simply whether Heathrow can achieve its mode share targets, but whether it can do so without displacing wider transport demand or undermining the connectivity and growth aspirations of surrounding communities.

Concerns Regarding Mitigation

- 9.6.10 The Council is concerned that many of the mitigation measures identified within the draft HENPS remain dependent upon future investment decisions, policy interventions and behavioural changes that cannot currently be guaranteed. The assessment largely assumes that transport improvements will be delivered as required and that passengers and employees will respond in line with forecast mode share assumptions, yet provides limited evidence regarding how these outcomes will be secured, monitored or enforced.
- 9.6.11 The consequences of underperformance are also unclear. If public transport targets are not achieved, road traffic grows faster than anticipated or surrounding networks experience increased congestion, the framework does not establish clear mechanisms requiring additional intervention by the Airport Operator.
- 9.6.12 The Council is particularly concerned that local communities could experience the adverse effects of increased airport activity, whilst the responsibility for addressing resulting transport pressures falls to local highway authorities, transport providers or other public bodies. This risks transferring costs and operational burdens away from the Airport Operator and onto communities and public sector organisations.

How the Policy Should be Strengthened

- 9.6.13 The Council considers that the policy should be strengthened by requiring applicants to:
- i. a comprehensive baseline assessment of existing transport conditions, constraints and planned growth has been undertaken;
 - ii. surface access impacts can be accommodated without causing unacceptable effects on communities, the wider transport network or economic growth;
 - iii. all necessary transport infrastructure, services and mitigation measures are deliverable, funded and not dependent on uncertain third-party interventions;
 - iv. the consequences of failing to achieve mode share targets, transport improvements or other key assumptions have been assessed;
 - v. clear and enforceable targets are established for public transport use, road traffic and network performance, supported by robust monitoring and governance arrangements;
 - vi. the Airport Operator bears an appropriate share of the costs arising from expansion, including mitigation of impacts on local highways and communities;

- vii. communities experiencing the greatest transport impacts receive tangible improvements to local transport infrastructure and connectivity; and
- viii. airport growth is linked directly to surface access performance, with additional capacity released only where agreed transport outcomes are achieved and maintained, and with defined mitigation measures, operational restrictions or limits on further growth where those outcomes are not met.

9.6.14 The HENPS should establish a clear "growth control" principle whereby additional airport capacity can only be released once agreed surface access outcomes have been achieved and maintained. Failure to meet those outcomes should result in predefined mitigation, operational restrictions or limits on further growth until compliance is achieved or restored.

9.7 Biodiversity and Nature Conservation

Background

9.7.1 The draft HENPS recognises that Heathrow expansion has the potential to result in significant effects on biodiversity through habitat loss, fragmentation and increased pressure on ecological resources. The Council agrees that biodiversity is a critical consideration, particularly given the scale of development proposed and the importance of the surrounding ecological networks, green infrastructure and natural assets.

Concerns with the Assessment Requirements

- 9.7.2 The Council is concerned that the assessment framework focuses heavily on demonstrating compliance with biodiversity requirements through future mitigation, compensation and biodiversity net gain measures, without adequately addressing whether the ecological impacts of expansion can genuinely be replaced or restored.
- 9.7.3 There is a particular concern that the policy provides insufficient direction regarding the identification and delivery of offsite biodiversity compensation. Land identified for biodiversity compensation or biodiversity net gain should be assessed against Local Plan objectives, environmental strategies and the requirements of the relevant local planning authority, rather than being selected primarily on the basis of operational convenience.
- 9.7.4 The Council is also concerned that excessive focus on biodiversity metrics risks overlooking the real-world distribution of impacts. Biodiversity gains delivered elsewhere may satisfy numerical targets whilst failing to compensate those areas experiencing the greatest environmental effects. The assessment should therefore place greater emphasis on maintaining and enhancing biodiversity within the areas most affected by expansion.

Concerns Regarding Mitigation

- 9.7.5 The Council is concerned that the draft HENPS places significant reliance on future habitat creation and enhancement without sufficient certainty that these measures will deliver the intended ecological outcomes.
- 9.7.6 The Council also considers that ecological mitigation should deliver meaningful environmental benefits rather than prioritising the protection or reconnection of fragmented ecological networks at disproportionate cost or to the detriment of wider place-making objectives.
- 9.7.7 Finally, there is insufficient emphasis on the long-term monitoring and management of offsite biodiversity measures. The Council considers that all offsite biodiversity compensation and biodiversity net gain proposals, including sites located outside the airport boundary and wider masterplan area, should be subject to robust monitoring, reporting and review throughout their operational life.

Preferred Approach to Mitigation

- 9.7.8 Particular concern arises in relation to offsite biodiversity compensation. The largest ecological impacts from Heathrow expansion are likely to be experienced within and around the Colne Valley. The Council considers that a more strategic and environmentally beneficial approach would direct biodiversity investment into the Colne Valley Regional Park as a primary receptor for habitat creation, enhancement and long-term environmental improvement.
- 9.7.9 This would ensure that compensation is linked to the areas experiencing the greatest impacts whilst strengthening one of the most important areas of green infrastructure within the wider London region.

How the Policy Should Be Strengthened

- 9.7.10 The Council considers that the policy should be strengthened by requiring applicants to:
- i. provide a comprehensive baseline assessment of affected habitats, species, ecological networks and biodiversity assets;
 - ii. demonstrate that impacts have been avoided and minimised in accordance with the mitigation hierarchy before reliance is placed on compensation measures, and that any residual losses can realistically be recreated or restored;
 - iii. ensure offsite biodiversity compensation and biodiversity net gain proposals accord with Local Plan policies, local planning authority requirements and wider environmental objectives, and would be acceptable in planning terms as standalone proposals;
 - iv. prioritise biodiversity enhancement in areas experiencing the greatest ecological impacts, including the Colne Valley Regional Park;

- v. demonstrate how biodiversity proposals contribute to wider place making, landscape, recreation and nature recovery objectives;
- vi. establish clear, measurable and enforceable biodiversity outcomes, supported by long term funding, monitoring and management arrangements, with mechanisms requiring additional mitigation or compensation where outcomes are not achieved; and
- vii. establish a permanent Environment Fund to support biodiversity, environmental improvement, green infrastructure and community projects throughout the construction and operational life of the airport.

9.8 Land Use Including Open Space, Green Infrastructure and Green Belt

Background

- 9.8.1 The Council considers that land outside the airport boundary should not be used simply because it represents the most convenient option for the Airport Operator. Applicants should be required to demonstrate that proposed locations are genuinely necessary and represent the most appropriate solution when considered against alternative options, local planning objectives and the wider public interest.

Concerns with the Assessment Requirements: General

- 9.8.2 The Council is concerned that the assessment framework focuses on accommodating the airport's land requirements rather than demonstrating that the resulting losses are acceptable or unavoidable. There is insufficient consideration of the wider value of open spaces, community assets and green infrastructure, including their contribution to health, wellbeing, recreation, biodiversity, climate resilience and local character.
- 9.8.3 The framework also places too much emphasis on replacing land area rather than demonstrating equivalent quality, accessibility, functionality and community benefit.
- 9.8.4 The Council is also concerned that the draft HENPS provides insufficient safeguards for development outside the airport boundary. The 2019 Heathrow proposals identified extensive areas for mitigation, compensation and associated development largely on the basis of operational convenience, resulting in a sprawling pattern of development that paid insufficient regard to the best use of land for the Local Authority.
- 9.8.5 A further concern is that the assessment focuses primarily on the direct loss of land and open space whilst giving insufficient consideration to indirect impacts on the assets that remain. Open spaces may become less attractive, less accessible or less functional as a result of increased noise, severance, visual intrusion, traffic, air quality impacts or the loss of the communities that currently use them.
- 9.8.6 In some cases, open space may remain physically present but become effectively sterilised by the impacts of expansion. The assessment should therefore consider not only the

quantity of land lost, but also the quality, accessibility and usability of the land that remains.

Concerns Regarding Mitigation

- 9.8.7 The draft HENPS relies heavily on replacement provision without establishing clear standards for what constitutes acceptable mitigation. There is no assurance that replacement assets will be delivered in appropriate locations, meet the needs of affected communities or provide equivalent benefits to those lost.
- 9.8.8 Previous Heathrow proposals generally sought to replace facilities as close as possible to those being lost. This risks producing constrained solutions driven by operational convenience rather than wider place-making objectives or the long-term needs of communities. Replacement provision should therefore be planned in partnership with the relevant local authority and aligned with wider planning objectives.
- 9.8.9 Offsite mitigation, compensation and ancillary development should not be assumed acceptable simply because they support airport expansion. Development beyond the airport boundary and within the Green Belt should only be permitted where there is clear justification, no reasonable alternative and the proposal would be acceptable in planning terms.
- 9.8.10 The Council also considers that local authorities should not experience a net reduction in open space, recreation facilities or community assets as a consequence of expansion. Where impacts occur, provision should either be replaced directly or compensated through mechanisms that enable equivalent or enhanced provision to be delivered by the relevant local authority. Assets do not need to be in immediate use to have value. They represent future opportunities for communities and public services. Where direct replacement is not appropriate, alternative compensatory arrangements should be provided to ensure there is no net loss of public asset value.

Concerns Regarding Mitigation: Contamination

- 9.8.11 The Council is concerned that the draft HENPS does not establish sufficiently robust principles for the treatment and remediation of contaminated land. The approach taken within the 2019 Heathrow proposals included the excavation of historic landfill sites and the consolidation of waste into a number of newly engineered landfill areas. In the Council's view, this approach amounted to relocating contamination from areas where it conflicted with airport development to areas where it did not, rather than resolving the underlying environmental issue.
- 9.8.12 The Council considers this approach wholly unacceptable. Heathrow expansion presents a significant opportunity to remediate historic contamination, improve environmental conditions and reduce long term risks to human health, groundwater and the wider environment. This opportunity should not be missed through the creation of new contaminated land repositories designed principally for the convenience of the Airport Operator.

9.8.13 The Council is particularly concerned by proposals that would concentrate historic waste and contaminated materials in locations adjacent to existing communities, including Harmondsworth. The creation of new landfill facilities bordering remaining residential areas would represent a significant failure of environmental stewardship and would be difficult to reconcile with the principles of sustainable development and environmental improvement that underpin the draft HENPS.

How the Policy Should be Strengthened

9.8.14 The Council considers that the policy should be strengthened by requiring applicants to:

- i.** provide a comprehensive baseline assessment of affected land uses, open spaces, community facilities and green infrastructure, including their social, environmental and community value;
- ii.** demonstrate that land take has been minimised, reasonable alternatives have been explored and development outside the airport boundary would be acceptable in planning terms as a standalone proposal;
- iii.** demonstrate that retained open spaces, recreation facilities and community assets will remain accessible, attractive and fit for purpose;
- iv.** secure equivalent or enhanced replacement provision for affected assets in partnership with the relevant local authority, ensuring there is no net loss of public open space, recreational assets, community facilities or public asset value;
- v.** demonstrate that any development within the Green Belt is justified by need, the absence of reasonable alternatives and, where required, very special circumstances;
- vi.** prioritise replacement, enhancement and investment within communities most affected by expansion, whilst ensuring mitigation contributes positively to place making, health and wellbeing, biodiversity, climate resilience and environmental quality;
- vii.** secure long-term funding, management, monitoring and maintenance arrangements for replacement assets and mitigation measures; and
- viii.** establish a permanent Open Space and Community Environment Fund to support environmental improvements, recreation facilities and community projects throughout the construction and operational life of the airport.

Contamination

- ix.** provide a comprehensive baseline assessment of contaminated land, historic landfill sites and associated risks to human health, groundwater and the wider environment;

- x. demonstrate that opportunities to remediate contaminated land and reduce long term environmental risks have been maximised;
- xi. ensure contaminated land is appropriately treated, remediated or rendered safe through a comprehensive remediation strategy;
- xii. demonstrate that contamination will not simply be relocated to alternative sites for the convenience of the development;
- xiii. avoid the creation of new landfill sites or long-term waste repositories unless there is a clear environmental justification and no reasonable alternative;
- xiv. demonstrate how the development will improve environmental conditions and reduce existing contamination risks; and
- xv. secure long term monitoring, management and funding arrangements where residual contamination risks remain.

9.9 Home Office Assets

Background

- 9.9.1 The Council considers that the draft HENPS adopts too narrow an approach by focusing primarily on Home Office assets. Heathrow operates as a major international port and relies on a wide range of regulatory, inspection, licensing and enforcement functions delivered by multiple public bodies and service providers.
- 9.9.2 The Council considers that failure to properly assess and future proof these facilities risks creating unnecessary costs for public authorities and could require significant alterations to newly delivered infrastructure shortly after completion.

Concerns with the Assessment Requirements

- 9.9.3 The assessment should not be limited to Home Office facilities alone. It should consider the full range of regulatory, inspection, licensing and enforcement functions required to support airport operations, including border controls, food and plant imports, animal health, quarantine, waste controls, customs functions and other statutory activities.
- 9.9.4 There is currently insufficient clarity regarding what facilities will be displaced by expansion, what future operational requirements will be, and whether replacement facilities will be capable of supporting a fully operational expanded airport.

How the Policy Should be Strengthened

- 9.9.5 The Council considers that the policy should be strengthened by requiring applicants to:
 - i. provide a comprehensive assessment of all regulatory, inspection, licensing and enforcement functions required to support airport operations, including existing facilities, future operational requirements and capacity needs;

- ii. agree replacement facility specifications, operational requirements and accommodation needs with the relevant authorities, agencies and service providers;
- iii. demonstrate that replacement facilities are appropriately located, sized, designed and future-proofed to support the operation of a fully expanded airport throughout its operational life;
- iv. secure the delivery of all necessary replacement facilities through the Development Consent Order process; and
- v. demonstrate that replacement facilities will meet future operational and regulatory requirements without imposing additional costs on public authorities.

9.10 Resource and Waste Management

Background

9.10.1 The draft HENPS recognises the importance of sustainable resource use, waste management and the safeguarding of mineral resources. The Council supports these objectives but is concerned that the current policy framework does not adequately address the scale of resource consumption, waste generation and mineral sterilisation associated with Heathrow expansion.

Concerns with the Assessment Requirements

9.10.2 The Council is concerned that the approach to mineral resources is significantly weaker than would normally be expected for a development of this scale. Whilst the draft HENPS refers to safeguarding mineral resources, it does not establish a clear expectation that viable mineral reserves should be extracted prior to development where feasible.

9.10.3 This represents a significant omission. Other forms of development are routinely expected to consider prior extraction to avoid unnecessary sterilisation of mineral resources. However, the 2019 Heathrow proposals made no meaningful provision for prior extraction, resulting in the risk that substantial mineral resources could be permanently sterilised whilst equivalent materials are imported to construct the development. The potential for mineral bearing land to be built over and subsequently used to facilitate the importation of the same materials from elsewhere is both inefficient and contrary to the principles of sustainable resource management.

9.10.4 The Council is also concerned that the draft HENPS does not adequately address the scale of demolition and construction waste likely to arise from expansion. Heathrow expansion would generate substantial waste streams from demolition, site clearance and construction activities. However, there is insufficient clarity regarding how these materials will be managed and whether existing local waste infrastructure will be expected to absorb additional demand.

Concerns Regarding Mitigation

- 9.10.5 The Council is concerned that the waste implications of expansion have not been fully considered in the context of existing waste management obligations and infrastructure serving West London.
- 9.10.6 In particular, waste arisings generated by the development should not place additional pressure on the West London Waste Authority or other local waste management arrangements. Given the scale of the project, the applicant should be expected to manage waste arising from construction, demolition and operational activities through dedicated arrangements consistent with the waste hierarchy and circular economy principles.
- 9.10.7 The Council is also concerned that insufficient consideration has been given to the implications of any loss, relocation or disruption of existing waste infrastructure. Particular attention should be given to the Energy from Waste facility and its role in supporting waste management across West London. The loss of this infrastructure must be assessed in the context of existing contracts, waste management capacity and wider public service requirements.

How the Policy Should be Strengthened

- 9.10.8 The Council considers that the policy should be strengthened by requiring applicants to:
- i.** provide a comprehensive assessment of mineral resources, waste infrastructure and waste management facilities affected by expansion;
 - ii.** demonstrate that opportunities for prior extraction have been fully assessed and that viable mineral resources are not unnecessarily sterilised, including maximising the use of indigenous materials where feasible;
 - iii.** quantify demolition, excavation, construction and operational waste streams and demonstrate how they will be managed in accordance with the waste hierarchy and circular economy principles;
 - iv.** provide dedicated waste management arrangements that do not place additional burdens on local authority waste infrastructure, services or contractual waste management arrangements;
 - v.** assess the impacts of expansion on existing waste infrastructure, including Energy from Waste facilities, and demonstrate how any lost capacity will be replaced; and
 - vi.** secure long-term funding, monitoring and reporting arrangements for resource use, waste management, material recovery and replacement infrastructure throughout the construction and operational life of the airport.
 - vii.** There should be a clear expectation that Heathrow expansion will not sterilise viable mineral resources that could reasonably be extracted.

9.11 Flood Risk

Background

- 9.11.1 The draft HENPS recognises that Heathrow expansion has the potential to affect flood risk through the loss of floodplain, increased areas of hardstanding, alterations to watercourses and changes to surface water management. The Council agrees that flood risk is a critical consideration, particularly given the scale of development proposed and the presence of major river corridors and existing communities at risk of flooding.

Concerns with the Assessment Requirements

- 9.11.2 The Council is concerned that the assessment framework focuses primarily on demonstrating that airport expansion can be accommodated without increasing flood risk, rather than identifying opportunities to deliver wider flood risk improvements for surrounding communities and catchments.
- 9.11.3 There is also concern that the policy places significant reliance on engineered flood mitigation and management measures without sufficient consideration of long term resilience, climate change and future maintenance requirements. Given the lifespan of airport infrastructure, flood risk management measures should be designed to accommodate a range of future climate and flood scenarios, rather than simply achieving compliance at the point of consent.

Concerns Regarding Mitigation

- 9.11.4 The Council is concerned that mitigation measures are presented primarily as a means of offsetting the impacts of development rather than delivering wider environmental benefits.
- 9.11.5 Expansion should not simply achieve a neutral flood risk outcome. Given the scale of intervention proposed, there should be a clear expectation that the development delivers a betterment in flood risk management, water quality and catchment resilience wherever reasonably practicable.
- 9.11.6 The Council is also concerned that flood storage areas, attenuation features and water management infrastructure could be located primarily on the basis of operational convenience rather than wider environmental and place making objectives.
- 9.11.7 Furthermore, the long-term effectiveness of flood mitigation measures will depend on ongoing management and maintenance. The policy currently provides limited assurance regarding how these arrangements will be secured and funded throughout the operational life of the airport. This is particularly important for interventions outside the operational airport boundary.

How the Policy Should be Strengthened

- 9.11.8 The Council considers that the policy should be strengthened by requiring applicants to:

- i. provide a comprehensive baseline assessment of flood risk, flood storage, drainage infrastructure, groundwater and watercourses affected by expansion;
- ii. assess flood risk at a catchment scale and demonstrate that development will not increase flood risk on or off site under current or future climate scenarios;
- iii. demonstrate that flood risk has influenced the design, layout and location of development, including application of the sequential and exception tests where required;
- iv. go beyond 'no net increase in flood risk' and move to 'net reduction' by identifying opportunities to reduce existing flood risk and deliver wider catchment, environmental and community resilience benefits;
- v. ensure flood storage, drainage and water management infrastructure remains effective throughout the operational life of the airport, supported by long-term funding, management, monitoring and maintenance arrangements; and
- vi. provide mechanisms requiring additional mitigation where flood risk impacts exceed forecast levels or mitigation measures underperform, whilst ensuring communities most affected by flood risk benefit from improved flood resilience.

9.12 Water Resources and Water Quality

Background

9.12.1 The draft HENPS recognises the importance of protecting water resources and water quality. The Council agrees that this is a critical issue given the scale of Heathrow expansion, increasing pressure on regional water supplies, the presence of sensitive groundwater and surface water environments, and growing concerns regarding historic and emerging contaminants.

Concerns with the Assessment Requirements

9.12.2 The Council is concerned that the assessment framework does not place sufficient emphasis on establishing a robust baseline understanding of existing water quality issues before assessing future impacts. In particular, there is a need for a comprehensive assessment of perfluoroalkyl and polyfluoroalkyl substances (PFAS), including PFOS, which have historically been associated with airport operations and firefighting activities.

9.12.3 The omission of detailed PFAS assessment from previous Heathrow expansion proposals raised concerns regarding transparency and the adequacy of the environmental evidence base. The Council considers it essential that the extent, distribution and potential pathways of PFAS contamination are fully understood before any conclusions are reached regarding the environmental effects of expansion. Without a robust baseline, it will be difficult to distinguish existing contamination from future impacts or to identify appropriate mitigation measures.

- 9.12.4 The Council is also concerned that insufficient attention is given to long term water resource management. Expansion will increase demands on already constrained water supplies, and the policy should place much greater emphasis on water efficiency, water reuse and reducing dependence on potable water supplies.

Concerns Regarding Mitigation

- 9.12.5 The Council is concerned that the draft HENPS focuses primarily on managing impacts rather than maximising opportunities for water efficiency and resource recovery.
- 9.12.6 Heathrow is uniquely placed to capture, store and reuse significant quantities of rainwater. Extensive roof areas associated with terminals, car parks and operational infrastructure provide opportunities for large-scale harvesting and storage.
- 9.12.7 Given growing water stress across the region, the Council considers that expansion should not simply demonstrate an adequate water supply. Instead, it should seek to minimise potable water demand and maximise the collection, recycling and reuse of water throughout the operational life of the airport.

How the Policy Should be Strengthened

- 9.12.8 The Council considers that the policy should be strengthened by requiring applicants to:
- i. provide a comprehensive baseline assessment of water resources, water quality, groundwater, surface waters and existing contamination risks, including detailed assessment and mapping of PFAS and other persistent contaminants, together with arrangements for investigation, management and remediation where necessary;
 - ii. assess the impacts of expansion on water supply, water quality, groundwater resources and aquatic environments across the wider catchment, demonstrating that development will not result in deterioration of water quality or increased pollution risks to groundwater or surface water bodies;
 - iii. identify opportunities to reduce potable water demand through water efficiency, rainwater harvesting, storage, recycling and reuse measures, including maximising the beneficial use of water collected from terminal buildings, operational facilities and other large roof areas;
 - iv. provide sufficient water storage, treatment and reuse infrastructure to support operational demands, establish clear water efficiency targets throughout construction and operation, and demonstrate how water neutrality will be achieved wherever reasonably practicable; and
 - v. secure long-term funding, monitoring, maintenance and reporting arrangements for water quality, water consumption and reuse infrastructure, together with mechanisms requiring corrective action where water quality standards, efficiency targets or water resource objectives are not achieved.

9.13 Historic Environment

Background

- 9.13.1 The draft HENPS recognises that Heathrow expansion will affect heritage assets, historic landscapes, archaeology and the wider historic environment. The Council agrees that these impacts are of particular importance given the concentration of designated and non-designated heritage assets in and around Heathrow, including the historic villages of Harmondsworth, Longford, Sipson, Harlington and Cranford.
- 9.13.2 Importantly, whilst a positive heritage legacy should be sought, there must be a realistic recognition that Heathrow expansion would result in a significant net loss of heritage assets, historic landscapes and archaeological resources.
- 9.13.3 The draft HENPS should therefore apply a substantially higher threshold to heritage mitigation, requiring applicants to go beyond conventional assessment, recording and compensation measures and demonstrate that every reasonable opportunity has been taken to preserve, protect, relocate, restore and enhance heritage assets and their settings.
- 9.13.4 Emphasis should be placed on investing in and securing the long-term viability of the historic assets, landscapes and communities that remain, supported by a comprehensive archaeological strategy setting out how discoveries will be investigated, preserved, archived, curated and, where appropriate, publicly displayed for public benefit.

Concerns with the Assessment Requirements

- 9.13.5 The Council is concerned that the assessment framework remains overly focused on individual heritage assets rather than the wider historic environment. The 2019 proposals, set against the 2018 ANPS, demonstrated the risk of assessing buildings and structures in isolation whilst underestimating the cumulative impact on historic settlements, landscapes and community identity. In some cases, assets would have remained physically intact but would have lost much of their significance through the destruction of their surroundings and historic context.
- 9.13.6 Paragraph 5.289 places no meaningful obligation on applicants beyond encouraging the exploration of positive heritage outcomes. The Council considers this wholly inadequate given the scale of heritage loss that Heathrow expansion would cause.
- 9.13.7 The policy should instead establish a clear requirement for applicants to secure tangible and measurable enhancements to the historic environment, with demonstrable outcomes agreed with local authorities, Historic England and other relevant heritage stakeholders. Where substantial heritage harm is accepted, applicants should be required to go significantly beyond standard mitigation and compensation measures, investing in the long-term conservation, restoration, interpretation and enhancement of the heritage assets, historic landscapes and communities that remain.

9.13.8 The policy should also require a comprehensive archaeological strategy to be prepared at the outset of the project. This should identify how archaeological discoveries will be investigated, recorded, preserved, archived, curated and, where appropriate, publicly displayed. Archaeological resources should not simply result in technical reports and archive boxes. The strategy should secure a lasting public legacy and maximise opportunities for research, learning, interpretation and public access.

Concerns with the Assessment Requirements: Justification for Losing Assets

9.13.9 Given the scale of anticipated heritage loss, the policy should establish a clear expectation that maximum effort is made to redesign those elements of the scheme that remain flexible in order to protect heritage assets of particular significance, rather than accepting their loss as an inherent consequence of expansion. The assessment framework should therefore require all heritage assets to be clearly mapped and categorised according to whether they are:

- proposed to be retained without impact;
- proposed to be retained but adversely affected;
- capable of being protected through amendments to the design;
- capable of being relocated, preserved or otherwise safeguarded;
- proposed to be partially lost or altered; or
- proposed to be lost entirely.

9.13.10 For all affected heritage assets, applicants should then be required to demonstrate:

- the significance of the asset and the contribution made by its setting;
- the nature and extent of the proposed impact;
- the measures taken to avoid impacts through design changes;
- the measures taken to reduce impacts where avoidance is not possible;
- whether relocation, salvage or preservation has been considered and, if so, its feasibility;
- why any remaining harm cannot reasonably be avoided; and
- where loss is proposed, the specific justification for that loss, including why

alternative design solutions have been discounted and why loss remains unavoidable.

Concerns Regarding Mitigation

- 9.13.11 The Council is concerned that previous Heathrow proposals treated heritage mitigation as a mechanism for documenting loss rather than avoiding it. Recording, interpretation and documentation have value, but they do not preserve the heritage assets, historic landscapes and communities that are destroyed. The 2019 proposals demonstrated an approach in which decisions to harm heritage assets were largely made first and mitigation devised afterwards. Heritage considerations should shape the design of the scheme from the outset, not simply manage the consequences once decisions have already been taken.
- 9.13.12 The policy must establish a far higher threshold for heritage protection. It should not be sufficient to record an asset before demolition or claim that relocation is impracticable without compelling evidence. Applicants should be required to demonstrate that every reasonable opportunity has been taken to redesign the scheme, avoid harm, retain assets in situ and preserve their historic setting. Where loss is proposed, the burden should rest firmly with the applicant to justify why that loss is unavoidable. Heritage assets should be preserved wherever reasonably practicable. Demolition should be the exception, not the expectation.
- 9.13.13 The same principle must apply to archaeology. Archaeological assets should not be excavated, catalogued and archived simply to clear the way for development. The policy should require a comprehensive archaeological strategy from the outset, ensuring discoveries are investigated, preserved, curated and, where appropriate, publicly displayed. Archaeology should leave a lasting public legacy through research, education and interpretation. It should not become a technical exercise undertaken solely to facilitate development.

How the Policy Should be Strengthened

- i. provide a comprehensive, publicly available and independently reviewable assessment of heritage assets, historic landscapes, archaeological resources and historic settlements;
- ii. assess heritage assets within their wider historic, landscape and community context, including cumulative effects on setting, character, significance and community identity;
- iii. secure measurable heritage enhancements, agreed with local authorities, Historic England and other relevant stakeholders, that are proportionate to the scale of heritage harm;
- iv. prepare a comprehensive archaeological strategy setting out how archaeological discoveries will be investigated, preserved, curated, archived, interpreted and, where appropriate, publicly displayed;

- v. map and categorise all affected heritage assets, demonstrate that reasonable alternatives, design amendments, preservation, relocation and salvage options have been fully explored, and provide a clear evidence-based justification for any loss that remains;
- vi. establish a strong presumption in favour of retaining heritage assets in situ wherever reasonably practicable and, where loss is unavoidable, require the salvage, conservation and reuse of significant architectural features, materials and historic fabric; and
- vii. demonstrate how remaining heritage assets, historic landscapes and communities will be protected, enhanced and supported to remain viable in the long term, with heritage and archaeological mitigation delivering a meaningful public legacy rather than being limited to recording and archive storage.

9.14 Landscape and Visual Impacts

Background

- 9.14.1 The draft HENPS recognises that Heathrow expansion has the potential to result in significant landscape and visual effects arising from new infrastructure, land take, changes to settlement patterns and the alteration of existing landscape character. The Council agrees that these impacts will be substantial given the scale of development proposed and the sensitivity of the surrounding environment, including the Green Belt, Colne Valley Regional Park, river corridors, open countryside and historic settlements.
- 9.14.2 The Council considers that Heathrow expansion should not simply seek to mitigate landscape harm but should be required to deliver a coherent and lasting landscape legacy. The policy should move beyond screening and visual mitigation and instead require applicants to demonstrate how the development will enhance landscape quality, strengthen green infrastructure, improve access to open space and reinforce the strategic role of assets such as the Colne Valley Regional Park.
- 9.14.3 Particular emphasis should be placed on avoiding the fragmented and sprawling approach evident in the 2019 proposals and ensuring that landscape mitigation contributes to a coherent vision for the future character of the area.

Concerns with the Assessment Requirements

- 9.14.4 The Council is concerned that the assessment framework focuses heavily on the effects of individual elements of the scheme rather than the cumulative effect of Heathrow expansion as a whole. The 2019 proposals demonstrated that the landscape impacts of expansion cannot be understood solely through the assessment of individual structures, highways, earthworks or mitigation areas. The combined effect of airport expansion, associated infrastructure, environmental mitigation, transport corridors and operational activity creates a fundamental change to landscape character across a much wider area.

- 9.14.5 Particular concern arises from the extent of development proposed beyond the airport boundary. The 2019 masterplan demonstrated how highways, diversions, mitigation land, compensation sites, flood infrastructure and environmental interventions can combine to create a sprawling landscape footprint extending well beyond the airport boundary. The assessment framework should therefore consider the landscape effects of the entire masterplan and associated infrastructure rather than treating individual components in isolation.
- 9.14.6 The Council is also concerned that insufficient weight is given to the landscape and visual effects arising from aircraft operations. For many communities, the most significant visual impact of Heathrow is not the physical airport itself but the continuous movement of aircraft overhead. The assessment should recognise that visual intrusion is not limited to fixed infrastructure and should consider the cumulative effects of aircraft activity on landscape character, tranquillity and people's experience of place.

Concerns Regarding Mitigation

- 9.14.7 The Council is concerned that landscape mitigation is often presented as a means of screening development rather than addressing the underlying change in landscape character. Landscape planting, bunds and green infrastructure can assist in reducing visual effects but cannot fully compensate for the loss of openness, the urbanisation of the landscape or the introduction of major infrastructure into previously undeveloped areas.
- 9.14.8 The Council is also concerned that mitigation measures are frequently identified on the basis of operational convenience rather than landscape strategy. The 2019 proposals demonstrated how environmental and landscape mitigation can become fragmented and disconnected from wider place making objectives. Mitigation should contribute positively to the long-term quality, function and character of the landscape rather than simply serving as a visual buffer around development.
- 9.14.9 Particular attention should be given to the Green Belt, Colne Valley Regional Park and the remaining open land surrounding Heathrow. These areas provide settlement separation, access to open countryside, biodiversity value and an important landscape setting for West London. Where impacts are unavoidable, mitigation should deliver meaningful and lasting landscape enhancement.

How the Policy Should be Strengthened

- 9.14.10 The Council considers that the policy should be strengthened by requiring applicants to:
- i. provide a comprehensive baseline assessment of landscape character, visual amenity, settlement setting and landscape assets affected by expansion;
 - ii. assess the cumulative landscape and visual impacts of the airport masterplan, associated infrastructure, mitigation, compensation, offsite development and aircraft movements;

- iii. evaluate impacts on landscape character, visual amenity, tranquillity, openness, dark skies and people's experience of place;
- iv. demonstrate how landscape considerations have influenced the design, layout and location of development, including the avoidance of impacts wherever reasonably practicable;
- v. assess impacts on the Green Belt, Colne Valley Regional Park, river corridors, historic landscapes and the setting of surrounding settlements;
- vi. demonstrate that mitigation and enhancement measures form part of a coherent landscape strategy that contributes positively to place making, biodiversity, recreation and environmental quality, particularly within areas most affected by expansion; and
- vii. secure long-term funding, management, monitoring and maintenance arrangements, together with mechanisms requiring additional mitigation where landscape or visual impacts exceed those forecast.

9.15 Community Compensation

Background

9.15.1 The draft HENPS recognises the need to compensate and mitigate the impacts of Heathrow expansion on affected communities. However, the Council considers that the current approach is too heavily focused on addressing individual impacts rather than demonstrating how communities will benefit from expansion over the long term. Given the scale of disruption, environmental harm and community change associated with a third runway, the policy should establish a clear expectation that affected communities are not simply compensated for loss but are demonstrably better off as a result of the development.

Concerns with the Assessment Requirements

9.15.2 The Council is concerned that the assessment framework lacks a clear definition of what constitutes an acceptable compensation package and provides insufficient direction regarding how community benefits should be identified, delivered and measured. The policy places considerable emphasis on noise compensation whilst providing limited consideration of wider impacts on community facilities, health and wellbeing, recreation, social infrastructure, community cohesion and quality of life.

9.15.3 The Council is also concerned that the draft HENPS places too much reliance on applicants defining what constitutes an appropriate package of compensation and mitigation. This risks creating an approach where community benefits are constrained by affordability considerations rather than being determined by the scale of impacts experienced. The appropriate level of compensation should be established first. If the scheme is unable to

support the resulting requirements, this should be reflected in the planning balance rather than reducing the level of support available to affected communities.

- 9.15.4 The policy should also require applicants to establish a comprehensive baseline assessment of the airport's existing relationship with affected communities, including current benefits, funding arrangements, historic commitments, community perceptions and the adequacy of existing measures. This assessment should be undertaken collaboratively with local authorities and affected communities rather than being defined solely by the Airport Operator.

Wider Property Offer Zone

- 9.15.5 The Council is particularly concerned by the treatment of the Wider Property Offer Zone (WPOZ). The consultation material gives the clear impression that residents within the Heathrow Villages area will benefit from the scheme's property offer arrangements. In reality, eligibility criteria are yet to be defined and previous Heathrow proposals provided the Airport Operator with considerable discretion in determining who qualifies.
- 9.15.6 This creates a significant risk of uncertainty and misleading expectations for residents. The Council is concerned that many properties south of the M4 could fall within areas presented as benefiting from the WPOZ whilst ultimately being excluded through eligibility criteria determined by the Airport Operator.
- 9.15.7 The Council considers that eligibility criteria for any property compensation scheme should be established by the Department through the policy framework rather than left to applicants to determine. Compensation arrangements should reflect the actual impacts experienced by communities and should not become a mechanism through which applicants minimise costs by narrowing eligibility requirements. Residents should have certainty from the outset regarding whether they qualify and what support they can expect to receive.

Concerns Regarding Mitigation

- 9.15.8 The Council considers that the current approach to community mitigation is fundamentally inadequate. Previous proposals relied heavily on noise insulation and property compensation measures whilst providing limited consideration of how communities would continue to function and thrive alongside an expanded airport.
- 9.15.9 Future community strategies should move beyond compensating individual impacts and instead demonstrate how the airport will work for local communities. This should include a clear assessment of how expansion will improve community wellbeing, strengthen local facilities, support social infrastructure and deliver meaningful long-term benefits for those communities experiencing the greatest effects.
- 9.15.10 There is currently no robust mechanism for ensuring that community commitments remain effective throughout the operational life of the airport or for requiring corrective action where promised outcomes are not delivered.

Concerns Regarding Mitigation: Compensation Fund

- 9.15.11 The Council is concerned that paragraph 5.348 acknowledges the Airports Commission's recommendation for an annual Community Compensation Fund, yet the draft HENPS fails to conclude whether such a fund should be required. Given the scale, duration and permanence of the impacts associated with Heathrow expansion, it is difficult to understand why the draft HENPS stops short of requiring a dedicated and enduring compensation mechanism funded by the Airport Operator. Communities should not be expected to endure decades of disruption and operational impacts in the hope that voluntary arrangements may emerge at a later stage.
- 9.15.12 The concern is compounded by paragraph 5.349, which suggests that increased business rate revenues may contribute towards community benefits. This fundamentally misunderstands the purpose of community compensation. Business rates are public funds intended to support local authority services, not a substitute for the Airport Operator meeting its obligations to affected communities. Moreover, the assumption that expansion will generate additional business rate ignores the important timeline of full airport operation. There will be a significant loss of hotels, commercial premises and major employers that are lost to expansion. This results in an initial net reduction in business rate at a time when communities will need compensating through the construction phases.
- 9.15.13 The Government should adopt a much stronger position by requiring Heathrow to fully fund community compensation and mitigation. Local authorities and taxpayers should not be expected to subsidise the impacts of expansion, nor should public money be relied upon to deliver measures that are properly the responsibility of the Airport Operator.

How the Policy Should be Strengthened

- 9.15.14 The Council considers that the policy should be strengthened by requiring applicants to:
- i. provide a comprehensive baseline assessment of existing community impacts, current benefits, historic commitments and community perceptions of the airport, together with a Community Strategy prepared in partnership with local authorities, community representatives and affected residents setting out agreed priorities, outcomes and investment programmes;
 - ii. demonstrate how affected communities will be better off as a result of expansion, supported by a robust assessment of impacts on community assets, facilities and social infrastructure, including schools, healthcare, recreation, community buildings, places of worship, open space and local services;
 - iii. establish a permanent Community Compensation and Benefit Fund, financed by the Airport Operator, to support environmental, social, health, wellbeing and infrastructure improvements throughout the construction and operational life of the airport;

- iv. ensure compensation, mitigation and community investment are determined by the scale of impacts experienced, rather than affordability assumptions or commercial preferences, and prioritise communities experiencing the greatest impacts from expansion;
- v. establish property compensation eligibility criteria through the policy framework, ensuring consistent and equitable treatment of affected communities; and
- vi. establish clear, measurable and enforceable community outcomes, supported by long term funding, independent monitoring, scrutiny and corrective action where outcomes are not achieved, whilst ensuring affected communities continue to play a meaningful role in decision making throughout the operational life of the airport.

9.16 Community Engagement

Background

- 9.16.1 The Council supports the principle of ongoing engagement with affected communities. However, previous Heathrow consultations demonstrated significant concerns regarding transparency, accessibility and the extent to which engagement genuinely influenced decision making. Engagement should not be an exercise in explaining decisions that have already been made.
- 9.16.2 The Council considers that the policy should move beyond consultation and establish a culture of ongoing collaboration. Communities should be involved in shaping outcomes rather than responding to completed proposals. Effective engagement should be judged by the extent to which it changes decisions, improves outcomes and builds trust, not simply by the number of consultation events held.
- 9.16.3 The Council is concerned that, whilst the draft HENPS promotes community engagement, there is little independent oversight or recourse for communities who feel they are not being listened to or are experiencing the effects of poor decision making. The policy should therefore require independent governance and escalation arrangements that enable communities to challenge outcomes, hold the Airport Operator to account and secure corrective action where commitments are not met.

Concerns with the Assessment Requirements

- 9.16.4 The Council is concerned that the draft HENPS measures engagement by what applicants do rather than by what engagement achieves. There is insufficient emphasis on demonstrating how community views have influenced the design of the scheme, the identification of mitigation measures and the development of compensation proposals.
- 9.16.5 The draft HENPS also fails to address the challenges associated with multiple consenting processes. Where more than one DCO or major infrastructure project is promoted in the same area, there is a risk that conflicting information, inconsistent assumptions and

competing narratives create confusion and unnecessary anxiety for communities. The policy should require a coordinated approach to engagement that provides communities with clear, accurate and consistent information.

How the Policy Should be Strengthened

9.16.6 The Council considers that the policy should be strengthened by requiring applicants to:

- i.** prepare a Community Engagement Strategy in partnership with local authorities and affected communities, establishing clear principles, objectives and standards for engagement throughout the development lifecycle;
- ii.** demonstrate how community feedback has influenced the design, mitigation, compensation and operation of the scheme, and ensure communities have a meaningful role in shaping outcomes and community investment programmes;
- iii.** provide communities with timely access to clear, accurate and consistent information, particularly where multiple infrastructure projects affect the same area;
- iv.** establish independent governance, monitoring and scrutiny arrangements, together with escalation mechanisms and corrective action where engagement commitments are not met; and
- v.** ensure engagement remains an ongoing process throughout construction and operation, enabling community priorities to continue informing decision making over the operational life of the airport.

10 Other Matters

10.1 Recycling T5 mitigation

- 10.1.1 The Council is concerned that much of the mitigation presented within the draft HENPS is not genuinely new mitigation for Heathrow expansion at all. Instead, it appears to rely heavily on environmental improvements that have already been used to justify previous phases of airport growth, including Terminal 5, or which would occur irrespective of expansion through national policy, technological change and wider market developments.
- 10.1.2 This creates a fundamental problem. Environmental improvements such as cleaner aircraft, cleaner vehicles, improved public transport connectivity and reductions in background emissions should have delivered tangible improvements for communities affected by Heathrow's existing operations. Instead, the draft HENPS effectively treats those improvements as environmental headroom that can now be consumed by further airport expansion.
- 10.1.3 In simple terms, communities were previously told that future technological improvements would reduce environmental impacts. The draft HENPS now proposes to use many of those same improvements to accommodate an additional runway and hundreds of thousands of additional aircraft movements. The environmental gains are therefore not being shared with communities. They are being absorbed by airport growth.
- 10.1.4 This is not mitigation in any meaningful sense. Mitigation should reduce or offset the impacts of a development. What is proposed here is the reassignment of environmental benefits that have already been used to justify previous growth, together with benefits that would arise whether Heathrow expands or not.
- 10.1.5 The result is that Heathrow appears to receive the benefit twice. First, previous growth was justified on the basis that future technology would improve environmental performance. Now that those improvements are beginning to materialise, they are being used again to justify further growth. Meanwhile, local communities receive little or no net environmental benefit.

Conclusion

- 10.1.6 The final draft HENPS should make clear that environmental improvements arising from previous mitigation commitments, regulatory requirements, technological advances or wider market trends cannot automatically be counted as mitigation for Heathrow expansion. Applicants should be required to demonstrate that mitigation is genuinely additional to the baseline position and delivers a measurable environmental benefit beyond that which would occur in the absence of expansion.

10.2 Early Growth

- 10.2.1 The Council notes that neither the ANPS or the draft HENPS does not explicitly identify, assess or provide policy support for a programme of "early growth" in advance of the delivery of new runway capacity. Notwithstanding this, Heathrow Airport Limited previously indicated an ambition to secure additional air traffic movements before a third runway becomes operational.
- 10.2.2 Early growth raises a complex and interrelated set of issues that have not been comprehensively assessed in the draft HENPS. These include aircraft and ground noise impacts, air quality, carbon emissions, surface access, workforce travel demand, community impacts and pressure on utilities and public services.
- 10.2.3 In particular, Heathrow will experience a substantial reduction in airport related hotel provision and parking capacity as a result of redevelopment associated with expansion proposals, while continuing to support a very large on airport and surrounding workforce. Increased passenger numbers and air traffic movements ahead of runway delivery could therefore place additional pressure on local transport networks, public transport services, parking provision, freight movements, housing, accommodation and wider infrastructure. The interaction between these factors is complex and may give rise to effects that differ significantly from those assessed for an expanded airport operating with a third runway and associated supporting infrastructure in place.
- 10.2.4 If the Government intends early growth to form part of its strategy for Heathrow, this should be explicitly identified within the policy and supported by a dedicated assessment framework. Early growth represents a distinct development scenario with its own environmental, social and infrastructure implications and should be assessed on that basis.
- 10.2.5 In the absence of explicit policy recognition and assessment, the Council considers that there is no policy support within the draft HENPS for early growth. Any future Development Consent Order should therefore be assessed against the airport capacity and operational assumptions set out in the designated policy framework and should not rely upon untested assumptions regarding growth in air traffic movements or passenger numbers ahead of the delivery of new runway capacity.

10.3 Programme Failings

- 10.3.1 The Council is concerned that the draft HENPS provides little consideration of the consequences of programme delay despite Heathrow expansion being one of the largest and most complex infrastructure projects ever proposed in the UK. Major infrastructure schemes frequently take substantially longer to deliver than originally envisaged, resulting in prolonged disruption for affected communities.
- 10.3.2 Given the scale of land acquisition, demolition, construction activity, traffic impacts and environmental effects associated with Heathrow expansion, the duration of these impacts is as important as their magnitude. Once consent is granted and construction begins,

affected communities have limited ability to secure additional mitigation or compensation should delivery timescales significantly overrun.

- 10.3.3 The draft HENPS should therefore include stronger safeguards linked to programme delivery. These should require regular review of mitigation, compensation and community support measures where key milestones are missed. There must be a cost to a preferred promoter of missing programmes and this cost should form additional compensation to impacted communities.
- 10.3.4 Without such provisions, the risks associated with programme overruns fall disproportionately on host communities rather than the scheme promoter.