

Department for Transport

**Proposed draft revision
to the Airports National
Policy Statement**
To be known as the
Heathrow Expansion
National Policy Statement

Presented to Parliament pursuant to section 9(2) of the Planning
Act 2008



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CORRECTION SLIP

Title: Proposed draft revision to the Airports National Policy Statement
To be known as the Heathrow Expansion National Policy Statement

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Correction:

Text currently reads:

5.61 The Climate Change Act 2008 provides the UK's legal framework for reducing greenhouse gas emissions. Under the Act, the UK is required to reduce greenhouse gas emissions by at least 100% by 2050. To keep the UK on a pathway to achieving the 2050 target, the Secretary of State for Energy Security and Net Zero is required to set and meet legally binding, five-year caps on greenhouse gas emissions called carbon budgets. Carbon Budgets 1- 3 (2008-2022) were met with surplus, while the fourth (2023-2027), fifth (2028- 2032), sixth (2033-2037) and seventh (2038-2042) have been set and require a ~51%, ~57%, ~76% and ~87% reduction of greenhouse gas emissions from a 1990 baseline respectively. Under the Paris Agreement, the UK is also required to submit its Nationally Determined Contribution (NDC) to the UN Frameworks Convention on Climate Change (UNFCCC) every five years. To date, the UK has set NDCs to reduce GHG emissions by at least 68% by 2030, and at least 81% by 2035, on 1990 levels. Emissions from international flights are not included in the scope of the UK's two NDCs.

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Date of correction: 22 June 2026

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1. Introduction

Background

- 1.1 On 29 January 2025 the Government announced its support for a third runway at Heathrow Airport as part of its plans to go further and faster to kickstart economic growth. The Government is committed to harnessing the opportunities Heathrow expansion creates to deliver a modern, efficient transport system that attracts international investment, improves connectivity and enhances the UK's global competitiveness.
- 1.2 The Airports National Policy Statement (Airports NPS) was designated in 2018. This was informed by the work of the Airports Commission which was established to evaluate the need for additional capacity to maintain the UK's position as Europe's most important aviation hub, and how any need for additional capacity should be met in the short, medium and long term¹.
- 1.3 The Airports Commission published its Report in July 2015², which concluded that the proposal for a Northwest Runway at Heathrow Airport, combined with a significant package of measures to address its environmental and community impacts, presented the strongest case for meeting additional capacity need and offered the greatest strategic and economic benefits. This was considered in comparison with other options including a Gatwick Second Runway Scheme and Heathrow Extended Northern Runway Scheme. The Government accepted the Airports Commission's recommendation on the Northwest Runway Scheme at Heathrow Airport and commenced work to develop the 2018 Airports NPS. As part of this, the Government undertook further work on the location of the preferred scheme and consulted on a draft Airports NPS and supporting Appraisal of Sustainability in February and October 2017. The Transport Select Committee undertook scrutiny of the Airports NPS and published its recommendations on 19 March 2018.
- 1.4 The Airports NPS was laid before Parliament on 5 June 2018 ahead of a debate and vote by the House of Commons on 25 June 2018. On 26 June 2018, the Airports NPS was designated as a national policy statement under the provisions of section 5(1) of the Planning Act. A number of Judicial Review

¹ <https://www.gov.uk/government/organisations/airports-commission>

² [Airports Commission: final report - GOV.UK](#)

claims were brought against the decision to designate the Airports NPS. All claims were dismissed by the High Court in May 2019, but that decision was appealed and the Court of Appeal found the Airports NPS to be unlawful in February 2020. This decision was contested, and the Supreme Court overturned the Court of Appeal's decision in December 2020.

- 1.5 Since the Airports NPS was designated, significant global, policy and legislative changes have taken place. Changes to the NPS process have also been introduced through the Planning and Infrastructure Act 2025, with a new requirement to review and update NPSs at least every five years. The Government has therefore decided to review the current Airports NPS in light of these changes and to align with the Government's four tests for Heathrow expansion on climate change, noise, air quality and economic growth across the country. This review was launched in a Ministerial Statement on 22 October 2025³.
- 1.6 To help determine the approach to the review, the Government invited potential scheme promoters to submit proposals, to ensure the review could consider up to date Heathrow expansion proposals. Seven proposals were received and assessed. Following that assessment, the Department for Transport announced in October 2025 that two schemes remained under active consideration with a view to reaching a final decision on a single scheme to inform the Airports NPS review. On 25 November 2025 the Government decided that the Heathrow Northwest Runway scheme, brought forward by Heathrow Airport Limited, offered the most credible and deliverable option and would be the scheme to inform the Airports NPS review.
- 1.7 The review has taken into consideration the Airports NPS's uniqueness in being a single site-specific NPS. In undertaking this review, the Government has had regard to the scale and depth of the Airports Commission's work which remains the most comprehensive independent assessment of the need for additional runway capacity in the South East of England and of the options for meeting that need. The Government has also considered updated evidence since 2018 including changes in demand, policy, legislation and the wider airport system, as well as updated proposals for expansion at Heathrow. Accordingly the Government has not revisited the strategic location of additional runway capacity on a blank-sheet basis, but has considered whether there remains a sound case for expanding hub capacity at Heathrow, via the Heathrow Northwest Runway scheme, that such expansion is capable of meeting its four tests on climate change, noise, air quality and economic growth across the country, and that the requirements it places on an applicant are robust and up to date.
- 1.8 In light of the conclusions reached, the Airports NPS has been renamed the Heathrow Expansion NPS to reflect the Government's confirmed position that the appropriate location for a new runway in the South East of England remains at Heathrow, and to make clear that this is a site-specific NPS which continues to have effect for the purposes of section 104 in the Planning Act 2008, in relation to the provision of a Northwest Runway and associated

³ [Realising the benefits of expansion at Heathrow Airport - GOV.UK](https://www.gov.uk/government/news/realising-the-benefits-of-expansion-at-heathrow-airport)

infrastructure at Heathrow Airport only. Paragraphs 1.21 to 1.23 refers to the relevant planning frameworks for expansion at airports other than Heathrow and paragraphs 4.7 to 4.11 sets out the role of other National Policy Statements.

Development covered by the Heathrow Expansion NPS

1.9 The Heathrow Expansion NPS provides the basis for decision making, and the policies within it will have effect in relation to, applications for development consent that cover any of the following:

- A Northwest Runway having a runway length of up to 3,500m and forming part of a scheme which, on completion, is capable of enabling at least 260,000 additional air transport movements (ATMs) per annum⁴;
- Any new terminal infrastructure or the reconfiguration of terminal facilities associated with the Northwest Runway at Heathrow Airport; and
- Any associated infrastructure, surface access facilities and changes to the strategic road network.

1.10 The Government recognises that the Heathrow Northwest Runway scheme currently promoted by Heathrow Airport Limited, and which has informed this NPS, is not limited to the construction of a new runway and associated new terminal infrastructure. It also includes the modernisation, reconfiguration and integration of existing terminal and airport infrastructure required to enable the airport to operate effectively as an expanded and integrated whole. As a result, the scheme now envisaged is of substantial scale and complexity, both in its physical extent and in the way it would need to be delivered while maintaining the continued operation of Heathrow Airport.

1.11 The Government expects any application brought forward under this NPS ultimately to provide for a complete Northwest Runway scheme, including the runway, terminal capacity and other supporting infrastructure required for the scheme to operate as an integrated whole. However, given the scale, complexity and likely delivery timeframe of a scheme of this kind, the Government recognises that it may be appropriate for such a scheme to be brought forward and delivered in phases. A phased scheme which enables, and does not hinder, the delivery of the completed scheme as a whole is capable of being compliant with this NPS. Where a phased approach is proposed, the application should clearly identify the content and sequencing of each phase, including how runway, terminal and other supporting infrastructure will be coordinated and integrated over time. Any such approach must demonstrate a clear, coherent and deliverable pathway to the completed scheme as a whole and cannot comprise a runway or terminal in isolation.

⁴ The Heathrow Expansion NPS stipulates the length of the new runway to ensure that the new infrastructure can accommodate the largest commercial aircraft, as they operate many of the long haul flights that support the UK's position as a major aviation hub

- 1.12 For a scheme to be compliant with the Heathrow Expansion NPS, the Secretary of State would expect to see these key elements comprised in its design, and their implementation and delivery secured.

Scheme variation

- 1.13 While the Government has decided that it supports a Northwest Runway at Heathrow Airport (an indicative masterplan is at Annex B of the Heathrow Expansion NPS), this does not limit variations resulting in the final scheme for which development consent is sought. To benefit from the full support of policy within this NPS, any application(s) will have to fall within the description set out in paragraph 1.9 of this NPS. However, the detailed form of development for which an application is made is a matter for the applicant. The Heathrow Expansion NPS governs the location, limits and nature of such schemes. It will be for an Examining Authority, and ultimately the Secretary of State, to determine whether any future application is compliant with this NPS, meets the need for additional capacity, and is of benefit to the UK, whilst minimising any harm caused.

Purpose and scope of the Heathrow Expansion NPS

- 1.14 The Heathrow Expansion NPS sets out:

- The Government's policy on the need for increased capacity at Heathrow Airport;
- Why the Government has selected the Heathrow Northwest Runway scheme for the purposes of the Airports NPS review; and
- The specific requirements that a scheme must demonstrate and meet in order to make an application for development consent.

- 1.15 For the purposes of section 5(5)(e) of the Planning Act 2008, Heathrow Airport Limited, as a statutory undertaker, is identified as an appropriate person⁵ to carry out development necessary for the expansion of Heathrow Airport.

- 1.16 This identification is made for the specific and limited purpose of providing clarity in relation to statutory blight provisions, and to provide clarity for local communities and for consultation purposes on preparatory work for DCO applications. In accordance with section 169 of the Town and Country Planning Act 1990, Heathrow Airport Limited will, where relevant, be the appropriate authority for the purposes of statutory blight arising in connection with such development associated with expansion.

⁵ The identification of an appropriate person for the purposes set out above does not in itself confer any additional weight in the consideration of applications for development consent. The purpose of identifying Heathrow Airport Limited as an appropriate person is to provide clarity and certainty to affected communities regarding statutory blight arrangements, to ensure the effective operation of those statutory provisions, and to support a clear and consistent allocation of responsibility in circumstances where development must be integrated with the existing airport. This replaces the need for any separate legal agreements between the Secretary of State for Transport and promoters of expansion.

1.17 Other NPSs may also be relevant to decisions and the general principles section in Chapter 4 provides more detail on this. Under section 104 of the Planning Act 2008, the Secretary of State must decide any application in accordance with any relevant NPS unless he or she is satisfied that to do so would:

- Lead to the UK being in breach of its international obligations;
- Be unlawful;
- Lead to the Secretary of State being in breach of any duty imposed by or under any legislation;
- Result in adverse impacts of the development outweighing its benefits; or
- Be contrary to legislation about how the decisions are to be taken.⁶

1.18 The Heathrow Expansion NPS refers in some places to other relevant documents. These other documents may be replaced, updated or amended over the lifetime of this NPS, and so successor documents should be referred to when this is the case.

Transitional provisions following review

1.19 The Secretary of State has decided that for any application accepted for examination before the designation of the amended Heathrow Expansion NPS, the 2018 Airports NPS should have effect. Once the Heathrow Expansion NPS is published and designated it will replace the Airports NPS.

1.20 The Heathrow Expansion NPS will therefore have effect only in relation to those applications for development consent accepted for examination after the final publication of the Heathrow Expansion NPS. However, any emerging draft NPSs are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each Development Consent Order (DCO) application.

Relationship between the Heathrow Expansion NPS and aviation policy

1.21 The Heathrow Expansion NPS does not affect Government policy on wider aviation issues, for which the 2013 Aviation Policy Framework and any subsequent policy statements still apply.

1.22 Airports wishing to make more intensive use of existing runways will still need to submit an application for planning permission or development consent to the relevant authority, which should be judged on the application's individual

⁶ Planning Act 2008, section 104 – decisions in cases where an NPS has effect

merits. The Government accepts that it may be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.

1.23 Making Best Use (MBU) policy published in June 2018 sets out the policy framework for airports seeking to make best use of existing runways beyond Heathrow⁷. MBU does not apply to development at Heathrow. The Government continues to consider MBU to be relevant and important for all UK airports outside of Heathrow and will consider updating MBU to ensure it reflects the latest data, policy and legislation.

Duration

1.24 The Heathrow Expansion NPS will remain in place until it is withdrawn, amended or replaced. It will be reviewed, in accordance with the Planning Act 2008, when the Secretary of State considers it appropriate to do so, and at least every five years in line with the Planning and Infrastructure Act 2025.

Territorial extent

1.25 There are no direct impacts which affect devolved administrations, from the development located at or adjacent to Heathrow Airport, which is covered by the Heathrow Expansion NPS. However, where relevant, the assessment of impacts should take into account of any wider impacts this infrastructure may have in the devolved administrations, such as the impacts on domestic connectivity. Some aspects of aviation noise policy are devolved but others are reserved.⁸

1.26 Aviation policy is largely a reserved matter, though planning policy is not. Specifically:

- The National Assembly for Wales has devolved powers relating to airports in terms of land use planning and surface access policy;
- The Scottish Parliament has competence for planning in Scotland, and some powers in relation to aerodromes are also devolved to the Scottish Parliament; and
- The Northern Ireland Executive and Assembly have devolved powers relating to airports in terms of regional land use planning, surface access policy and funding, and environmental policy. The Northern Ireland Executive also has responsibility for airport economic regulation, has powers to control land in the interests of the safe and efficient use of airports, has the ability to grant aid for airports infrastructure, and may exercise certain controls relating to the management of airports.

⁷ <https://assets.publishing.service.gov.uk/media/5b16b68d40f0b634b469fa35/making-best-use-of-existing-runways.pdf>

⁸ For the avoidance of doubt, references to matters which are “reserved” in this section refer to those matters of legislative responsibility reserved to the Westminster Parliament under the UK’s devolution arrangements

Appraisal of Sustainability

- 1.27 An Appraisal of Sustainability is required by the Planning Act 2008 in relation to any NPS, or if any NPS is amended. An Appraisal of Sustainability, which describes the analysis of reasonable alternatives to the Northwest Runway scheme, has been carried out to inform the Heathrow Expansion NPS. This builds on the Appraisal of Sustainability carried out for the 2018 Airports NPS⁹. The Appraisal of Sustainability informs the development of the Heathrow Expansion NPS by assessing the potential economic, social and environmental impacts of options to increase airport capacity at Heathrow.
- 1.28 The Appraisal of Sustainability also incorporates an assessment in accordance with the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) ('SEA')¹⁰. The Appraisal of Sustainability was published alongside this NPS¹¹.
- 1.29 The conclusions of the Appraisal of Sustainability for this NPS identify significant beneficial effects for the local economy during operation of the airport, reflecting increased airport capacity, improved connectivity and the generation of employment. At the national level, economic effects are found to be uncertain as a proportion of activity may reflect changes in where economic activity takes place rather than wholly additional growth. The appraisal identifies significant adverse environmental effects in the following areas: air quality; biodiversity; climate change in relation to adaptation and mitigation; historic environment; landscape; noise; resources and waste; soil; and water. For communities and quality of life the appraisal identifies significant adverse effects at the local scale and significant beneficial effects at a wider scale resulting in mixed effects overall for communities. The strategic-level Appraisal of Sustainability does not pre-judge the outcome of future development consent decisions, nor does it replace the need for project-level assessment. Instead, scheme-level evidence is used to inform conclusions on the likely sustainability implications of this NPS, recognising that detailed design, mitigation and regulatory control will influence the final outcomes.
- 1.30 The Government expects any applicant to carry out a further and more detailed study ahead of seeking development consent and to secure appropriate mitigation measures, including monitoring through the development.

Habitats Regulations Assessment

- 1.31 The Heathrow Expansion NPS has also been assessed under the Conservation of Habitats and Species Regulations 2017¹². A Habitats Regulations Assessment has been undertaken at a strategic level and was

⁹ [Appraisal of sustainability for the proposed Airports National Policy Statement - GOV.UK](#)

¹⁰ <https://www.legislation.gov.uk/uksi/2004/1633/contents>

¹¹ <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-appraisal-of-sustainability>

¹² <https://www.legislation.gov.uk/uksi/2017/1012/contents>

published alongside this NPS¹³. This builds on the Habitats Regulations Assessment undertaken for the Airports NPS that was published in 2018¹⁴.

- 1.32 The strategic-level Habitats Regulations Assessment, conducted in accordance with the Conservation of Habitats and Species Regulations 2017, concluded that it is not possible to rule out adverse effects of the Heathrow Northwest Runway scheme, given that more detailed project design information, and detailed proposals for mitigation, are not presently available. Considering this, a derogations assessment has been applied that concludes that there are no feasible alternatives to deliver the objectives of the Heathrow Expansion NPS that would have less impact on Habitats sites, and that it is possible, at the DCO stage, following the development of mitigation measures, detailed design, and further investigation/modelling that a conclusion of no adverse effects on integrity could be drawn. It also concludes that there are sufficient options available to a developer that effective compensation for adverse effects on integrity should be possible, if necessary.
- 1.33 Any development brought forward through this NPS that is likely to have a significant effect on a Habitats site, either alone or in combination with other plans or projects, would be subject to a project-level Habitats Regulations Assessment at the detailed design stage. If it could not be concluded that there would be no adverse effects on site integrity, the project would not receive development consent on this basis, unless (a) there were no alternative solutions, (b) there were imperative reasons of overriding public interest in support, and (c) the necessary compensatory measures to protect the site were secured. At detailed design stage, and in so far as it may be necessary, the matters set out in this NPS will be relevant to determining whether there are alternative solutions and imperative reasons of overriding public interest, provided that the design remains consistent with the objectives of this NPS.

Equality Impact Assessment

- 1.34 The Heathrow Expansion NPS has been informed by an Equality Impact Assessment, which was published alongside this NPS¹⁵. The assessment builds on the Equality Assessment carried out for the Airports NPS that was published in 2018¹⁶.
- 1.35 Under the Equality Act 2010, public bodies have a statutory duty to (amongst other things) ensure race, disability and equality are considered in the exercise of their functions. The Equality Impact Assessment considered the potential equalities implications of a Northwest Runway scheme that informs this NPS, including the effect on persons or groups of persons who share certain characteristics protected by the Equality Act 2010. The Equalities Impact Assessment identified a mix of potential positive and negative equality

¹³ <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-habitats-regulations-assessment>

¹⁴ [Habitats regulations assessment for the proposed Airports National Policy Statement - GOV.UK](#)

¹⁵ <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-equality-impact-assessment>

¹⁶ [Equality assessment for the proposed Airports National Policy Statement - GOV.UK](#)

impacts. Positive impacts primarily relate to employment, skills and connectivity benefits, whereas negative impacts relate mainly to the loss and relocation of homes, employment and community facilities, as well as environmental change, construction disruption and severance.

- 1.36 The assessment concludes that this NPS contains a comprehensive set of policy requirements that, if implemented effectively, provide a strong framework for avoiding, reducing or mitigating negative impacts and supporting equality of opportunity. The assessment identifies several areas where additional clarity, evidence or targeted measures would strengthen an applicant's ability to demonstrate due regard to the equality considerations set out in the Public Sector Equality Duty. Overall, the assessment concludes that the Department for Transport has given due regard to the three limbs of the Public Sector Equality Duty in preparing this NPS.
- 1.37 This NPS requires that final impacts on affected groups, including differential, disproportionate or cumulative impacts, should be the subject of a detailed review, carefully designed through engagement with the local community, and approved by the Secretary of State. It should be possible to avoid, reduce or fully or partially mitigate negative equalities impacts through good design, operations and mitigation plans.

Health Impact Analysis

- 1.38 The Heathrow Expansion NPS has been subject to a Health Impact Analysis, which was published alongside this NPS¹⁷. This builds on the Health Impact Analysis undertaken for the Airports NPS that was published in 2018¹⁸.
- 1.39 The Health Impact Analysis identified that the Northwest Runway scheme which informs this NPS has potential to impact the health of local communities through a wide variety of pathways. Major beneficial health effects are considered likely relating to employment and income, education, skills and training opportunities. However, adverse effects are considered likely with regard to access to housing, noise, access to social infrastructure, community identity and cohesion and air quality. There is potential for cumulative and in-combination effects to amplify both the beneficial and the adverse effects identified within the Health Impact Assessment, but mitigation measures and service provision could help avoid these adverse effects.
- 1.40 In order to be compliant with this NPS, a further project level Health Impact Assessment is required. The application should include and propose health mitigation and monitoring, which seeks to maximise the health benefits of the scheme and takes all reasonable steps possible to mitigate any negative health impacts.

¹⁷ <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-health-impact-analysis>

¹⁸ [Health impact analysis for the proposed Airports National Policy Statement - GOV.UK](#)

Environmental Principles Policy Statement

1.41 Under the Environment Act 2021, Ministers of the Crown must also have due regard to the Environmental Principles Policy Statement (EPPS) currently in effect when making policy, and this duty therefore applies to this NPS. The duty does not apply where Ministers are making individual decisions in accordance with a NPS or deciding on individual planning applications.

2. The need for additional airport capacity

The importance of aviation to the UK economy

- 2.1 International connectivity, underpinned by strong airports and airlines, is important to the success of the UK economy. It is essential to allow domestic and foreign companies to access existing and new markets, and to help deliver trade and investment, linking us to valuable international markets and ensuring that the UK is open for business. It facilitates trade in goods and services, enables the movement of workers and tourists, and drives business innovation and investment, being particularly important for many of the fastest growing sectors of the economy.
- 2.2 International connectivity attracts businesses to cluster round airports, and helps to improve the productivity of the wider UK economy. Large and small UK businesses rely on air travel, while our airports are the primary gateway for vital time-sensitive freight services. Air travel also allows us ever greater freedom to travel and visit family and friends across the globe, and brings millions of people to the UK to do business or enjoy the best the country has to offer.
- 2.3 The UK benefits from a strong and substantially privatised airport sector, with a regulatory system that supports growth while ensuring the interests of passengers are at its heart. The Government believes that this is the right approach for the airport sector, but that Government has an important role to play in strategic decisions like planning future airport capacity.
- 2.4 London serves more airport destinations with regular passenger services than any other city in Europe. The UK's airports handled 299 million terminal passengers in 2025, the highest number ever, and a 2% increase on 2024 levels. Of this, Heathrow Airport handled 84.5 million terminal passengers in 2025, which was 28.2% of the UK total. The sector benefits the UK economy through its direct contribution to GDP and employment, and by facilitating trade and investment, manufacturing supply chains, skills development, and tourism.

- 2.5 In 2023, the air transport and aerospace sectors directly contributed around £23 billion to UK GDP¹⁹ and directly provided around 240,000 jobs across the UK²⁰. The UK has a significant aircraft manufacturing industry, and will benefit economically from growth in employment and exports from future aviation growth. Air Passenger Duty (APD) remains an important contributor to Government revenue, in 2026-27 the Office for Budget Responsibility forecast that APD will raise £5.2 billion in tax revenue²¹. Heathrow Airport directly supports around 80,000 jobs on site²².
- 2.6 Businesses from across the UK utilise our aviation network to access markets worldwide. The UK's strong services sector, which provides significant export earnings for the country, is particularly reliant on aviation. The sector includes, among others, financial services, insurance, creative industries, education, and health – all of which rely on face-to-face engagement with customers for success.
- 2.7 Air freight is also important to the UK economy. Although only 1% of UK trade by weight is carried by air, it is typically used for high-value and time-sensitive goods, and accounted for a much larger proportion – around 33% - of the value of UK imports and exports in 2024²³. This is especially important for industries which require a time critical supply-chain such as the advanced manufacturing sector: for example, medicinal and pharmaceutical products represented over 10% of UK good exports by value in 2025²⁴.
- 2.8 Aviation also brings many wider benefits to society and individuals, including travel for leisure and visiting family and friends. This drives further economic activity. Tourism directly contributed around £60 billion to UK gross added value in 2023²⁵ and overseas residents visiting Great Britain by air spent around £28 billion in 2024,²⁶ with the wider UK tourism industry forecast to grow significantly over the coming years.
- 2.9 The importance of aviation and international connectivity to the UK economy, and in particular the UK's hub status, has only increased following UK's withdrawal from the European Union. As the UK continues to develop its new trading relationships with the rest of the world, it will be essential that increased airport capacity is delivered, in particular to support the continued development of long haul routes to and from the UK, especially to and from emerging and developing economies.

¹⁹ DfT analysis of Office for National Statistics (ONS) low-level aggregates of UK output GDP

²⁰ DfT analysis of Office for National Statistics (ONS) Business Register and Employment Survey data

²¹ <https://obr.uk/efo/economic-and-fiscal-outlook-march-2026/>

²² <https://www.heathrow.com/company/about-heathrow/gateway-to-growth>

²³ DfT analysis of HMRC Overseas Trade Statistics

²⁴ [Trade and investment core statistics book - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/100000/Trade_and_investment_core_statistics_book_-_GOV.UK)

²⁵ <https://www.ons.gov.uk/economy/nationalaccounts/satelliteaccounts/datasets/uktourismsatelliteaccountsables>

²⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/leisureandtourism/datasets/overseasresidentsvisitsstotheuk>

The need for new airport capacity at Heathrow through a Northwest Runway

Drivers of need for new airport capacity at Heathrow

- 2.10 The Airports Commission conclusions demonstrated a clear and urgent need for new airport capacity due to the anticipated capacity constraints in airports in London and the South East and forecasted growth in passenger demand. It also concluded that expansion through a Northwest Runway at Heathrow would be the best way to meet the need due to Heathrow's role as the UK's only major hub airport; and the consequences not expanding would have on international connectivity and domestic connections, which would limit investment and competition.
- 2.11 The Government has reviewed this need for new airport capacity at Heathrow using updated passenger demand forecasts, an updated appraisal of Heathrow expansion through a Northwest Runway and modelling of wider economic impacts through Spatial Computable General Equilibrium (SCGE) modelling. In doing so, the Government has also had regard, where appropriate and relevant, to the Airports Commission's evidence, analysis and statistics, reflecting the fact that they remain the most comprehensive independent assessment of the strategic need for additional runway capacity in the South East and of the options for meeting that need. Taking the outcomes of that updated evidence, together with the continuing relevance of the Airports Commission's analysis, into account, the Government has concluded that there is still a clear need for new airport capacity at Heathrow through a Northwest Runway scheme to support the Government's growth objective, for the following reasons:

Capacity constraints facing the sector

- 2.12 The decision in 2018 to designate the Airports NPS and support growth of existing runway infrastructure marked a significant step in Government policy on airport expansion. Since then, Stansted, Luton, Gatwick, Bristol and London City airports have applied for and received planning consent to increase capacity. Notwithstanding these planned expansions, the whole London airports system is forecast to be full by the mid to late 2040s, and Heathrow has been at or near full capacity for over 20 years. This demonstrates that there remains strong and sustained demand for aviation travel, and that growth at other airports, while important, is not expected to remove the need for additional capacity at Heathrow.
- 2.13 These capacity constraints are affecting our ability to travel conveniently and to a broader range of destinations than in the past. They create negative impacts on the UK through increased risk of flight delays and unreliability, restricted scope for competition and lower fares, declining domestic connectivity, erosion of the

UK's hub status²⁷ relative to foreign competitors, and constraining the scope of the aviation sector to deliver wider economic benefits.

- 2.14 These capacity constraints have been most acutely felt at Heathrow Airport, as the busiest two-runway airport in the world. In 2025 annual passenger numbers surpassed 84 million for the first time, and it had its busiest day on record on 1 August 2025. The forecasts demonstrate that Heathrow continues to attract strong passenger demand despite capacity increases at other airports, reflecting its unique appeal as the UK's only major hub airport, the breadth and frequency of destinations it offers, and the connectivity advantages it provides for both origin-and-destination and transfer passengers. A January 2025 survey carried out by Ipsos found that almost half of British adults agreed Britain's airport capacity should be increased and, among this cohort, expansion at Heathrow was identified as the most popular option to meet that capacity²⁸.

Maintaining an internationally competitive hub airport

- 2.15 While the aviation sector has continued to evolve since the Airports Commission formed its conclusions, the economic fundamentals that underly these conclusions have not changed. As reported by the International Air Transport Association in 2023, airlines continue to use hubs to efficiently connect passengers while benefiting from economics of scale and traffic density²⁹. As such, the hub-and-spoke model remains the predominant approach to delivering network connectivity.
- 2.16 On the expansion of point-to-point travel, there does continue to be strong activity from low-cost carriers, often connecting between secondary airports. However, the low-cost long-haul market has not demonstrated sustained success in western markets, with numerous previous attempts failing to prove profitable. The economic fundamentals that limit the ability of low-cost airlines to operate such services are still relevant³⁰, and so the hub-and-spoke model remains best suited to deliver long-haul connectivity.
- 2.17 Heathrow is the UK's only major hub airport, stemming from the convenience and variety of its direct connections across the world, but this status is already challenged by restricted connectivity. Comparable hub airports in Europe are operating without the same capacity constraints as Heathrow. Paris Charles de Gaulle and Frankfurt have four runways, and with spare capacity these hub airports are able to attract new flights to growth markets, this can be seen by Charles de Gaulle launching direct routes to Phuket and Manila. The UK's airports also face growing competition from hubs in the Middle East like Dubai, Abu Dhabi, Doha and Istanbul. These competitors have benefited from the capacity constraints at Heathrow Airport, and have seen faster growth than Heathrow over the past few years. Heathrow Airport was overtaken by Dubai in

²⁷ Defined as the frequency of flights and the density of a route network

²⁸ [Half of Britons support increasing airport capacity, but environmental concerns are key | Ipsos](#)

²⁹ [Air Passenger Market Analysis](#)

³⁰ [Can long-haul low-cost airlines be successful? - ScienceDirect](#)

2014 as the world's busiest international passenger airport³¹. Expansion at Heathrow Airport will allow the UK to compete more effectively against other international competitors.

- 2.18 The consequences of not increasing capacity at Heathrow Airport are detrimental to the UK economy and the UK's hub status. International connectivity will be restricted as capacity restrictions mean airlines prioritise their routes, seeking to maximise their profits. Capacity constraints therefore lead to trade-offs in destinations, and while there is scope to respond to changing demand patterns, this necessarily comes at the expense of other connections. Domestic connectivity into the largest London airports could also decline as competition for slots encourages airlines to prioritise more profitable routes.
- 2.19 Heathrow serves over 200 destinations worldwide with a regular service, including a diverse network of onward flights across the UK and Europe³². Building on this base, expansion at Heathrow Airport will mean it will continue to attract a growing number of transfer passengers, providing the added demand to make more routes viable. In particular, this is expected to lead to more long haul flights and connections to fast-growing economies, helping to secure the UK's status as a global aviation hub, and enabling it to play a crucial role in the global economy.
- 2.20 Compared to a no expansion scenario, the Government estimate that a Northwest Runway at Heathrow Airport would result in 217,000 additional flights a year by 2055 across the UK as a whole (including 38,000 long haul), and 45 million additional passengers a year³³.
- 2.21 The ease with which businesses can move staff around the globe is an important facilitator of trade and for businesses locating and remaining in the UK. The broad range and frequency of long haul flights at Heathrow Airport meets this need. It would deliver benefits for UK passengers (both business and leisure) by allowing them to travel to more destinations flexibly. These benefits include the additional frequency of flights, for example connecting the UK to long haul destinations daily instead of weekly, or several times a day instead of daily. Businesses from across the UK currently take advantage of Heathrow Airport's international connections, and will continue to benefit from these following expansion. In particular, the additional capacity delivered at Heathrow Airport will support growth in important sectors of the UK economy, including tourism, financial services, and the creative industries.
- 2.22 The Government recognises the importance that the nations and regions of the UK attach to domestic connectivity, particularly connections into Heathrow Airport. Airports across the UK provide a vital contribution to the economic

³¹ ICAO Annual Report of the Council - 2014, Appendix 1

³² DfT Analysis of CAA Airport Statistics, 2025. A "regular" service is defined as at least 51 departing passenger flights on an airport-to-airport route across the calendar year. This is an average of just under a return service per week (to account for occasional cancellations), though some services will be seasonal and only operating at certain times of the year

³³ <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-appraisal-report>

wellbeing of the whole of the UK. Without expansion, there is a risk that, as airlines react to limited capacity, they could prioritise routes away from domestic connections. The Government therefore sees expansion at Heathrow Airport as an opportunity to not only protect and strengthen the frequency of existing domestic routes, but to secure new domestic routes to the benefit of passengers and businesses across the UK.

Passenger and wider economic benefits

- 2.23 Without expansion, passengers are likely to suffer from higher fares and more delays. High demand for air travel at airports with limited or no scope for increased capacity could weaken competition, allowing airlines to charge higher fares. As airports fill up and operate at full capacity, there is little resilience to deal with any disruption, leading to delays.
- 2.24 As the busiest two runway airport in the world, operating at full capacity, there is substantial pent up demand from passengers and airlines at Heathrow. Expansion would increase the availability of services, and increase competition between airlines. This would lead to significant benefits to business and leisure passengers and the wider economy. Additional benefits will come from workers moving to more productive jobs around the expanded airport as well as the productivity benefits from firms who will enjoy lower aviation transport costs. The Northwest Runway scheme is expected to provide between £29.2 billion to £42.4 billion cumulative benefits to UK passengers and the wider economy over 60 years³⁴.
- 2.25 These benefits are expected to be realised by passengers across the UK as they make use of the additional services provided by the expanded airport. In 2055, 10.5 million additional passengers from outside of London and the South East are forecast to make one way international journeys from Heathrow Airport. While expansion will also see some displacement of passengers from regional airports to the London system, overall regional airports are expected to continue displaying strong growth in passenger numbers by 2055.
- 2.26 Expansion via the Northwest Runway scheme should deliver additional jobs at the airport, through its supply chain and in the local community. The Northwest Runway scheme is expected to generate up to 61,000 additional jobs in the local area by 2055³⁵.
- 2.27 The Government believes that not increasing capacity will impose costs on passengers and on the wider economy. The Airports Commission estimated that direct negative impacts to passengers, such as fare increases and delays, would range from £21 billion to £23 billion over 60 years³⁶. Without expansion, capacity constraints would impose increasing costs on the rest of the economy over time, lowering economic output by making aviation more expensive and less

³⁴ <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-appraisal-report>

³⁵ <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-appraisal-report>

³⁶ Airports Commission: Final Report, p81; present value over 60 years

convenient to use, with knock-on effects in lost trade, tourism and foreign direct investment.

2.28 It is very challenging to put a precise figure on these impacts, but using alternative approaches the Airports Commission estimated these costs to be between £30 billion and £45 billion over 60 years. The Airports Commission urged caution interpreting these figures, which overlap with the direct passenger costs reported above and so are not wholly additional. But they do illustrate that not increasing airport capacity carries real economic costs to the whole economy beyond aviation passengers. Having reviewed this further, while it is acknowledged that precise estimates would now differ, the Government accepts the broad conclusions of this analysis.

Freight benefits

2.29 The aviation sector can also boost the wider economy by providing more opportunities for trade through air freight. The time-sensitive air freight industry, and those industries that use air freight, benefit from greater quantity and frequency of services, especially long haul. By providing more space for cargo, lowering costs, and by the greater frequency of services, this should in turn provide a boost to trade and GDP benefits. Expansion at Heathrow Airport will deliver a significant boost in long haul flights, and therefore a considerable benefit to air freight. This is further facilitated by the existing and proposed airport development of freight facilities as part of the Northwest Runway scheme. Heathrow Airport currently has a substantial freight handling operation. In 2024, Heathrow handled 1.6 million tonnes of cargo, representing 60% of all freight handled at UK airports in terms of tonnage, and four times more than any other UK airport. Around £216 billion worth of imports and exports passed through Heathrow in 2024, representing 72% of the value of goods passing through UK airports and 23% of the value of all UK imported and exported goods across transport modes. Expansion at Heathrow Airport will further strengthen the connections of firms from across the UK to international markets.

2.30 A wide range of economic sectors benefit from the freight connectivity that Heathrow provides. In 2025, £412 million of salmon, the majority of which was sourced from Scotland, was exported through Heathrow Airport, accounting for over 85% of salmon exports to non-EU countries including £283m of this to the United States and £55 million to China. Meanwhile, more than £2.2 billion of exports related to aircraft and spacecraft were transported via Heathrow in 2025 along with £4 billion of professional, scientific and controlling instruments and apparatus³⁷.

2.31 The vast majority (95%) of freight handled at Heathrow is carried in the bellyhold of passenger services. This contrasts with the UK's other large air freight hubs (Stansted and East Midlands), where most freight is carried on cargo-only services. Heathrow uniquely benefits from its extensive range of passenger

³⁷ DfT analysis of HMRC Overseas Trade Statistics

routes, and was the only airport directly serving a number of long haul destinations in 2025, including Vietnam, Malaysia and Taiwan³⁸.

- 2.32 Expansion is therefore expected to deliver a significant increase in air freight capacity, with an additional 38,000 long haul flights at the UK level by 2055. Since 2010 Heathrow has consistently handled more than 1.5 million tonnes of cargo annually, aside from years where the Covid-19 pandemic had a significant economic impact. While it has maintained this level, it has struggled to grow its cargo volumes despite robust demand for cargo in the South East of the UK, in part due to lack of cargo capacity at the site. Expansion at Heathrow therefore provides an opportunity to address constraints limiting the ability to grow and increase freight volumes further and to strengthen Heathrow's role in connecting UK businesses to international markets.

Safety and Resilience

- 2.33 Operating existing capacity at its limits means there will be little resilience to unforeseen disruptions, leading to delays and cancellations. This is particularly acute at Heathrow which has been operating at or near full capacity for 20 years. Expansion at Heathrow through a Northwest Runway scheme would maximise the potential to improve capacity and therefore provide greater flexibility to respond to changes in the aviation sector and operate resiliently and reliably.
- 2.34 Operating an airport at or near full capacity can negatively affect the passenger experience, as when issues arise the airport has less ability to absorb the impact and recover quickly. The Airports Commission recognised that this was a particular issue at Heathrow Airport where the high level of runway utilisation at the airport leaves almost no scope in the timetable to recover from any unforeseen incident, and that there was no real prospect of resilience being significantly improved in a two-runway scenario³⁹.
- 2.35 The detrimental effect of disruption was seen in 2025 when a fire occurred at a High Voltage electricity substation causing power loss at Heathrow Airport. Significant disruption was experienced by approximately 200,000 passengers. While the incident would not have been solved by increased capacity, it did highlight the constraints Heathrow Airport faces operating at full capacity, including limited operational windows to carry out works to improve resilience or upgrade assets, as well as the challenges of operating within a highly constrained footprint⁴⁰, and the reduced ability to clear backlogs once the airport reopens.
- 2.36 While increasing capacity alone does not automatically improve resilience, and managing demand growth and operational readiness are of key importance, it is clear that Heathrow Airport remains runway-constrained, and increased runway capacity will best enable passengers to continue to fly from the airport with less disruption in the future. Resilience is also of particular importance to operating a

³⁸ DfT analysis of CAA Airport Statistics

³⁹ Airports Commission, Business case and sustainability assessment - Heathrow Airport Northwest Runway

⁴⁰ Kelly review into the circumstances related to the closure of Heathrow Airport on 21 March 2025

hub airport as changes to traffic flows and connections can be particularly disruptive to the network of services it provides.

Conclusion of the need for Airport Capacity at Heathrow through a Northwest Runway scheme

2.37 The Government has therefore concluded that there is a compelling national need for additional airport capacity at Heathrow, and that expansion through a Northwest Runway scheme is the most effective way of meeting that need. Heathrow has operated at or near full capacity for over 20 years and handled 84.5 million terminal passengers in 2025, representing 28.2% of all UK terminal passengers, while the wider London airport system is forecast to be full by the mid to late 2040s even with approved expansion elsewhere. As the UK's only major hub airport, Heathrow plays a unique role in supporting long-haul connectivity, domestic links, freight and the UK's international competitiveness. Its long-standing capacity constraints also reduce the resilience of the airport and the wider network, limiting the ability to recover from disruption and placing pressure on the reliable operation of critical national infrastructure. This NPS therefore establishes the strategic need for expansion at Heathrow as a matter of Government policy. Accordingly, the examination of any application accepted under this NPS should proceed on the basis that the strategic need for development of the kind covered by this NPS has been decided, and that the question for the Examining Authority and the Secretary of State is whether the application complies with this NPS and the relevant statutory framework, not whether expansion at Heathrow is needed in principle.

Designating Heathrow expansion as Critical National Growth Infrastructure

2.38 The Government has concluded that development covered by the Heathrow Expansion NPS set out in paragraph 1.9 is Critical National Growth Infrastructure (CNGI) because of the clear need for the identified expansion at Heathrow, and the economic and other strategic benefits it would provide.

2.39 The overarching needs case set out in paragraphs 2.10 to 2.37 underpins the case for development covered by the Heathrow Expansion NPS to be treated as CNGI. The need for such development to help achieve our economic growth objectives, together with the national resilience, connectivity, freight, passenger and wider strategic benefits, means that a policy presumption in favour of CNGI will apply in circumstances outlined in paragraph 4.17 below. Where the presumption applies it is unlikely that residual impacts will outweigh the need for CNGI. The Government strongly supports the delivery of CNGI, and it should be progressed as quickly as possible.

Ruling out a fourth runway

2.40 As part of its work, the Airports Commission considered the possibility that, in addition to the increased capacity provided by a Northwest Runway at Heathrow Airport, the airport might wish in the future to develop a fourth runway. The Airports Commission found no sound case for such a development. The

Proposed draft revision to the Airports National Policy Statement To be known as the Heathrow Expansion
National Policy Statement

Government has reconsidered this case and has concluded that the reasons for not supporting a fourth runway still stand. An application in the vicinity of Heathrow Airport for a fourth runway would therefore not be supported in policy terms, and should be seen as being in conflict with the Heathrow Expansion NPS.

3. The Heathrow Northwest Runway scheme

Overview

- 3.1 While the previous chapter of the Heathrow Expansion NPS sets out the Government's underlying policy and evidence on the need to expand capacity at Heathrow Airport, this chapter sets out why the Government has identified the Heathrow Northwest Runway scheme as the most viable and credible option for expansion.
- 3.2 Information is provided on the assessment that was carried out in 2025 to compare the scheme proposals submitted by Heathrow Airport Limited (HAL) and Heathrow West Limited (HWL), which led to the decision in November 2025 that HAL's proposal for a Northwest Runway scheme would inform the review of the Airports NPS.

Assessment of information submitted by Heathrow Airport Limited and Heathrow West Limited

Scheme Assessment Process

- 3.3 In January 2025, the Chancellor announced the Government's support for the development of a third runway at Heathrow. Following this, the Secretary of State for Transport invited potential scheme promoters to submit proposals for a third runway by 31 July 2025. This invitation reiterated the Government's clear objective to enable the delivery of an operational third runway by 2035, and promoters were asked to set out their plans for delivering against this ambition in their proposals. It set out essential information required from proposals on airport scheme design; expected timelines; costs and revenues; ownership financing and funding; deliverability; and environmental implications and planned mitigations. The Government also indicated that proposals may be used to support the review of the Airports NPS, and that the Government

would assess all proposals against the criteria set out in the letter and announce next steps in the autumn.

- 3.4 The Department for Transport received expansion proposals from seven organisations. These were assessed against the criteria in the Secretary of State's letter, with input from specialist financial and technical advisers, as well as the Civil Aviation Authority (CAA). At this stage, five proposals were determined not to be suitable to inform the Airports NPS review as they did not substantially meet the criteria set out in the letter.
- 3.5 On 22 October 2025, the Secretary of State formally launched the Airports NPS review and provided an update on the assessment of proposals, confirming that two scheme proposals, promoted by Heathrow West Limited (HWL) and Heathrow Airport Limited (HAL), remained under active consideration. To provide as much clarity and certainty for communities, investors and users of Heathrow as soon as possible, the Secretary of State announced that the Government would be seeking further information on the two proposed schemes with a view to reaching a final decision on a scheme to inform the remainder of the Airports NPS review by the end of November. HAL and HWL were asked to provide additional information by 12 November 2025.
- 3.6 This stage of the assessment process involved a comparative assessment of the information provided by HWL and HAL on their respective schemes. It was concluded that the Northwest Runway scheme brought forward by HAL's proposal offered the most credible and deliverable option, principally due to the relative level of maturity of its proposal, the comparative level of confidence in the feasibility and resilience of its surface access plans, and the stronger comfort it provided in relation to the efficient, resilient and sustainable operations of the airport over the long-term. Further information on this process is set out below.
- 3.7 This decision was set out by the Secretary of State in a Written Ministerial Statement on 25 November 2025.

Assessment of additional information submitted by scheme promoters

- 3.8 To support the identification of a scheme to inform the remainder of the Airports NPS review, in November 2025 the Government conducted a comparative assessment of information from the two remaining scheme promoters – HWL and HAL. This stage of the process was not about whether a particular scheme met a set of criteria, but a direct comparison of each scheme, based on the response received to the Government's request for further information. When considering the additional information, the Government considered the following matters in particular:
- The extent to which proposals will integrate with existing infrastructure as smoothly as possible;
 - The extent to which a proposal will require land acquisition and the extent to which it will cause blight;

- The extent to which it has been demonstrated that the proposals are deliverable from a financing perspective;
- The extent to which it has been demonstrated that surface access arrangements associated with the proposal are deliverable and minimise network disruption;
- The extent of economic benefits that are expected from a particular proposal.

3.9 Detail on the further information requested from scheme promoters, and the conclusions that the Government reached are set out below. These are based on the findings of a panel of officials, with assessment informed by external consultants and the Heathrow expansion team within the Department for Transport.

Integration with Existing Infrastructure

3.10 Information requested: Promoters were asked to provide evidence of how their proposed schemes would integrate with existing infrastructure. They were asked to provide a detailed overview of what aircraft could operate from the new runway and whether there would be operational restrictions on the aircraft; whether all terminals would be able to access the new runway; the proposed operational procedures of all three runways and how they would provide the respite that is set out in the original Airports NPS. Additionally, they were asked to provide details of what external assurance and engagement they had undertaken to confirm that the necessary airspace could be designed to meet the operational requirements and air traffic movements required in their proposal; the number of ATMs and passengers the airport would be able to physically accommodate by year, both in a scenario where the proposal proceeds and in a counterfactual scenario without runway expansion.

3.11 Conclusions: HAL's scheme proposal included a runway that at full length would be able to support all aircraft departures, although the two scheme proposals would be comparable when considering integration with the wider airport system. HWL's proposed scheme included a 2,800m runway whilst HAL's scheme proposed a 3,500m runway. Whilst both could support the majority of ATMs (both HWL and HAL's proposed schemes asserted that they could support the airport achieving 756,000 ATMs per annum), both HAL and HWL's proposals set out that a 2,800m runway would support a smaller proportion of all flight operations when compared to HAL's scheme proposal of 3,500m. HAL's scheme proposal design ensured all terminals would have full access to all runways via dual Code F taxiways (suitable for the largest aircraft types). HWL's proposal however, would have included dual Code F taxiways around the end taxiways, but would have relied on a Code E taxiway between the main and satellite terminals. HWL's scheme proposal indicated that their runway would cover 97.8% of all operations, and when the runway is integrated with Heathrow's existing runway system to make use of mixed mode operations, the number of non-standard take-offs would be 0.7% (i.e. 0.7% of take-offs would require a different runway for departure). HAL's proposals outlined that their runway would support 99.3% of take-offs, meaning that whilst a 3,500m runway would be able to support more aircraft

departures from the new runway when compared to HWL's scheme proposal, the two schemes would be comparable when considering integration within the wider airport system.

3.12 At the time of the comparison between the two schemes, the longer runway in HAL's proposal was considered to be advantageous in terms of providing greater operational resilience and potential futureproofing for next-generation aircraft when compared with the 2,800m runway in HWL's scheme proposal.

3.13 HAL, as the airport operator, brought proven capability to integrate new infrastructure with existing systems. HAL's scheme proposal outlined detailed engagement with National Air Traffic Services (NATS) and other relevant stakeholders on airspace design and the airspace change process, whereas HWL's scheme proposal did not show evidence of engagement with stakeholders on airspace change to date.

Land Acquisition

3.14 Information requested: Promoters were asked to provide information and maps which showed the exact land required for delivery and the number of properties that would be impacted by their proposal (e.g. blight); or those that would require compulsory purchase, including the locations of all affected properties. Furthermore, they were asked to provide details of engagement they had with affected communities.

3.15 Conclusions: While HAL's scheme proposal required more land, it would require the acquisition of fewer residential properties around the airport than HWL's scheme proposal. Consideration of land take and impact on surrounding homes and communities was part of the comparative assessment. The loss of an additional 102 homes under the HWL scheme proposal was considered to be a significant difference, particularly when many of these further properties would not have been subject to previous uncertainty and consequential disruption from previous expansion plans. It was considered that this different impact on affected communities made the residential land take a material factor in assessing which scheme proposal should be selected and that HAL's proposed scheme would deliver a relatively lesser impact on communities than HWL's proposed scheme in this respect.

3.16 The limitations on the evidence provided on noise impacts of each scheme necessarily limited the ability to consider the merits of either scheme proposal on this basis.

Financeability

3.17 Information requested: Promoters were asked to provide a detailed overview of how the runway and supporting terminals would be financed, including a breakdown of debt and equity sources and insight from financial market engagement. It was requested that this include: a breakdown of the key risks that most influence the scheme's ability to be financed; how capital markets

would likely perceive those risks; and the strategy used to manage them to ensure the scheme would be wholly privately financed. Other aspects of the assessment process were promoter-agnostic. Given that two specific promoters' schemes were under consideration at this stage, this criterion examined the likelihood of a scheme coming forward, rather than the credibility of those bringing forward the scheme.

- 3.18 Conclusions: The assessment considered the extent to which it had been demonstrated that the proposals were deliverable from a financing perspective. Overall it was considered that HAL's scheme proposal demonstrated greater capability to finance delivery of an expansion scheme. HAL's experience and a proposed debt-raising approach appeared to offer greater potential than HWL's; HAL's investor profile provided greater confidence in its ability to raise equity, and the proposal included a greater level of detail to assess financeability.
- 3.19 It was acknowledged that some risks remained around HAL's scheme proposal's dependence on pre-Covid market assumptions and that there were risks due to the potential scale of the project for both proposals. Any scheme will be expected to pursue an approach that ensures efficient delivery and cost control.

Surface Access

- 3.20 Information requested: To minimise unnecessary disruption, promoters were asked to provide additional information regarding the construction of road schemes. In particular, further detail on the timeline, level of anticipated disruption and mitigation during construction and the schemes' overall impact on the road network (both for the Strategic Roads Network and local roads), including use of temporary road access and offline construction was requested. Promoters were also asked to provide assurance of working with National Highways, Network Rail and Transport for London on their surface access schemes, and for a clear plan for the development of transport modelling.
- 3.21 Conclusions: While both schemes would inevitably require additional work to progress, the HAL scheme proposal was considered comparatively more mature in its approach to road infrastructure and more credible in achieving the Government's aspirations to meet the timeline for the delivery of a scheme at Heathrow Airport.
- 3.22 Confidence in the feasibility of associated highway works was considered to be another critical differentiator between the two scheme proposals. HAL had already progressed detailed work for their proposed changes to both the strategic road network and local roads, including for the M25 tunnel. Both scheme proposals presented major engineering challenges and will require extensive works on the strategic road network. However, the HAL scheme proposal offered greater confidence in feasibility due to its relative maturity, detailed engagement history, sophisticated modelling and structured approach to mitigating disruption. Department for Transport and

National Highways have a clearer understanding of both feasibility and the next steps to address outstanding issues with HAL's proposed scheme.

- 3.23 While the HAL scheme proposal requires major works to the M25, assessment indicates that the HWL scheme proposal would also have a considerable impact on the M25 (including complex interventions at Junction 14, removal of Junction 14a, and construction of an A4 tunnel beneath the M25, alongside a complex A3044 arrangement). It was also considered there was not enough detail in terms of what was proposed to understand sufficiently the feasibility and consequential impact of HWL's scheme proposals on local roads.

Economic Benefits

- 3.24 Information requested: Promoters were required to provide information outlining the economic benefits that they considered their schemes would bring and when these benefits would be realised. It was requested that this be appropriately evidenced and referenced.
- 3.25 Conclusions: it was considered overall that it was not practicable to assess one scheme proposal over the other on the basis on information provided in this category.
- 3.26 Concerns were raised about the modelling and analysis provided by HAL's scheme proposal, and that the economic benefits figures provided by HWL's scheme proposal could not be assured.
- 3.27 As the proposed number of ATMs and additional passengers are broadly similar for both schemes, the economic benefits for both scheme proposals in that respect will also be broadly similar.
- 3.28 Given the level of uncertainty over programme timescales at the time and given that a delay of a few years was not considered to significantly impact the assessment of economic benefits at the time, it was considered not possible to assess either scheme proposal on the basis of claimed earlier delivery.

Additional Supporting Information

- 3.29 Information requested: Promoters were also invited to submit any other information that demonstrated why their scheme should be the scheme to inform the Airports NPS review and how their scheme would deliver an operational third runway by 2035, with applications for planning consent coming forward in time to enable decisions to be made this Parliament.
- 3.30 Conclusions: Similar information was provided by both promoters about the proposed timing of their DCO applications. HWL's scheme proposal included its intention to make a DCO application by the end of 2027 to achieve DCO decision by July 2029, assuming preparatory work may have begun in January 2026.
- 3.31 By comparison, HAL's scheme proposal stated its ambition to submit a DCO application by late 2027, but raised concerns about the feasibility of the timing

of the consenting process, with the implication that this was due to factors beyond HAL's control (i.e. the regulatory environment).

Summary

- 3.32 Following this comparative assessment, the Secretary of State confirmed on 25 November 2025 that the scheme as currently promoted by HAL would inform the ongoing Airports NPS review. The Government's view was that the Northwest Runway scheme brought forward by HAL offered the most credible and deliverable option, principally due to the relative maturity of its proposal, the comparative level of confidence in the feasibility and resilience of its surface access plans, and the stronger comfort it provided in relation to the efficient, resilient and sustainable operations of the airport over the long-term.
- 3.33 The Government considered that overall, the HAL scheme provided the greatest likelihood of meeting its ambition for a decision on Development Consent application within this Parliament.
- 3.34 The Secretary of State was clear that any amendments to the Airports NPS will be subject to public consultation and Parliamentary scrutiny in 2026 in accordance with the requirements of the Planning Act 2008. Any scheme identified in an amended Airports NPS will still need detailed consideration (including matters such as runway length, layout and supporting infrastructure) in any DCO sought under planning legislation.

Conclusion

- 3.35 The assessment of scheme proposals in 2025 concluded that HAL's proposal for a Northwest Runway scheme offers the most deliverable option and provides the greatest likelihood of meeting the Government's ambition for a decision on a development consent application within this Parliament. In particular, the runway length proposed is important because it provides greater operational resilience and supports the accommodation of a broader range of aircraft. The further work carried out for the review of the Airports NPS has also assessed the need for Heathrow expansion and the likely impacts and benefits of a Northwest Runway scheme. Taken together, that work confirms that the 3,500m scheme provides the most credible and deliverable basis on which to take forward expansion at Heathrow. The Government also recognises that a scheme of this scale and complexity may need to be brought forward in phases, and as set out in paragraph 1.11, this must be with a clear and credible route to a full scheme.

4. Assessment principles

General principles of assessment

- 4.1 The statutory framework for deciding applications for development consent is contained in the Planning Act 2008. Applications for development consent under the Planning Act 2008 must also follow the requirements in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. This chapter of the Heathrow Expansion NPS sets out general policies in accordance with which applications relating to a Northwest Runway at Heathrow Airport are to be decided. This chapter is specific to assessments necessary for the Heathrow Northwest Runway scheme but is not exhaustive as to the assessments that may be applicable to that scheme.
- 4.2 The Heathrow Expansion NPS covering the Heathrow Northwest Runway scheme establishes the needs case for that proposed development, provided it adheres to the detailed policies and protections set out in this NPS, and the legal constraints contained within the Planning Act 2008. The statutory framework for deciding nationally significant infrastructure project applications where there is a relevant designated NPS is set out in section 104 of the Planning Act 2008.⁴¹

Criteria an applicant will need to meet

- 4.3 The Heathrow Expansion NPS applies to schemes at Heathrow Airport (in the area shown, for this purpose, illustratively, within the scheme boundary map at Annex A) covered in paragraph 1.9. This would include any relevant infrastructure that is directed by the Secretary of State to be treated as a Nationally Significant Infrastructure Project under Section 35 of the Planning Act 2008. The Secretary of State's policy in relation to other airport infrastructure in the South East of England is set out at paragraphs 1.22 and 1.23 above.
- 4.4 In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account:

⁴¹ Planning Act 2008, section 104 – decisions in cases where an NPS has effect

- Compliance with the Government's four tests as defined in the paragraphs 5.25 to 5.28, 5.53 to 5.56, 5.86 to 5.89 and 5.99 to 5.100;
- Compliance with other policies within this NPS;
- The designation of expansion as Critical National Growth Infrastructure;
- Any other potential benefits; and
- Any other potential adverse impacts (including cumulative impacts) and the mitigations put forward to avoid, reduce or compensate for that impact.

4.5 In this context, environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels. These may be identified in this NPS, or other relevant legislation and policy, both national and local. The Secretary of State will also have regard to the manner in which such benefits are secured, and the level of confidence in their delivery.

4.6 Matters which are controlled by separate regulatory regimes may, in the context of a particular development proposal, be a material consideration where they have land-use implications. Decision makers should assume, unless there is clear evidence to the contrary, that those separate regimes will operate effectively.

The role of other National Policy Statements

4.7 The National Networks NPS sets out the Government's policies to deliver development of nationally significant infrastructure projects on the national road and rail networks and strategic rail freight interchanges. It provides planning guidance for promoters of nationally significant infrastructure projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.

4.8 Where the applicant's proposals in relation to surface access meet the thresholds to qualify as Nationally Significant Infrastructure Projects under the Planning Act 2008, or are associated developments under section 115 or are directed to be treated as a Nationally Significant Infrastructure Project under section 35 of the Planning Act 2008, the Secretary of State will consider those aspects by reference to both the National Networks NPS and the Heathrow Expansion NPS, as appropriate. To the extent that discrete aspects of the surface access proposals do not qualify as nationally significant and cannot be included in a development consent application as associated development (for example), the applicant will be expected to pursue or secure necessary consent(s) through the most appropriate alternative consenting regime. This might include, for example, the Town and Country Planning Act 1990, the Highways Act 1980, or the Transport and Works Act 1992, promoted by a third party if need be.

- 4.9 The Secretary of State will consider any relevant nationally significant road and rail elements of the applicant's proposals in accordance with the National Networks NPS and with the Heathrow Expansion NPS.
- 4.10 Other NPSs, such as the Energy NPSs or Water NPSs, may present relevant considerations for some decisions on applications relating to Heathrow Northwest Runway scheme for development consent.
- 4.11 If there is conflict between the Heathrow Expansion NPS and other NPSs, the conflict should be resolved in favour of the Heathrow Expansion NPS as the NPS most relevant to the scheme. The Heathrow Expansion NPS, the National Networks NPS, the Energy NPS, the Water Resources NPS and Waste Water NPS may also be material considerations in decision making on applications for schemes associated with or related to the Heathrow Northwest Runway scheme that fall under the Town and Country Planning Act 1990, the Transport and Works Act 1992, or other legislation relating to planning. Whether, and to what extent, the Heathrow Expansion NPS, the National Networks NPS, the Energy NPS, the Water Resources NPS and Waste Water NPS are a material consideration will be judged on a case by case basis by the relevant decision makers.

Application of planning requirements and obligations

- 4.12 The Examining Authority should only recommend, and the Secretary of State will only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.⁴² The need for requirements in respect of the phasing of the scheme is likely to be an important consideration, so that effects of construction and operational phases are properly mitigated, as well as any changes in the operations of the airport that may occur in line with the phasing of physical works and commencement of operations. Guidance on the use of planning conditions or any successor to it should be taken into account where requirements are proposed.
- 4.13 Development consent obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the proposed development and fairly and reasonably related in scale and kind to the development.
- 4.14 In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land, and the impact of that use, rather than the control of processes, emissions or discharges themselves.
- 4.15 The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction, carbon emissions and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary

⁴² [National Planning Policy Framework](#) or any successor document

of State should act to complement but not seek to duplicate those regulatory regimes.

Critical National Growth Infrastructure (CNGI)

- 4.16 The Government has concluded that development covered by the Heathrow Expansion NPS, set out in paragraph 1.9, is critical to national growth, and that CNGI policy below applies to any applications for this type of development. This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008.
- 4.17 The CNGI presumption applies where:
- a) applicants have identified negative impacts arising from its proposal;
 - b) applicants have demonstrated that the mitigation hierarchy⁴³ has been applied, to avoid, reduce, or offset impacts; and
 - c) the four tests have been met in paragraphs 5.25 to 5.28, 5.53 to 5.56, 5.86 to 5.89 and 5.99 to 5.100.
- 4.18 In those circumstances, the need for CNGI to achieving economic growth objectives, together with the national resilience, connectivity, freight, passenger and wider strategic benefits, means that a presumption in favour of granting consent for CNGI will apply and it is unlikely that consent will be refused on the basis of residual impacts.
- 4.19 The CNGI policy presumption does not override any legal requirements (including under section 104 of the Planning Act 2008).
- 4.20 CNGI policy does not create an additional or cumulative need case or weighting to that which is already outlined for infrastructure covered by this NPS. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to non-Habitats Regulations Assessment (HRA) residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State.
- 4.21 Exceptional circumstances may outweigh the CNGI presumption. Exceptional circumstances include where residual impacts remain which present an unacceptable risk to, or unacceptable interference with human health, public safety, defence, irreplaceable habitats or flood risk.
- 4.22 During decision making, the CNGI policy will influence how non-HRA residual impacts are considered in the planning balance. The policy will therefore also

⁴³ A term used to incorporate the avoid, reduce, mitigate, compensate process that applicants need to go through to protect environment and biodiversity.

influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a Northwest Runway scheme application. Further detail is provided in paragraphs 4.29 to 4.30.

- 4.23 During decision making, the CNGI policy will inform the Secretary of State's approach to HRA derogations. Specifically, the policy explains how the alternative solutions and imperative reasons of overriding public interest (IROPI) tests are considered by the Secretary of State. Further detail is provided in paragraphs 4.31 to 4.34. Further detail on wider HRA policy is provided in paragraphs 1.31 to 1.33.

Applicant's assessment

- 4.24 The applicant must clearly demonstrate how they have met the requirements in this NPS, met the four tests and relevant legal requirements, and that they have applied the mitigation hierarchy. Any residual impacts that remain should be clearly defined and the harm articulated. Applicants should also seek the advice of the appropriate Statutory Nature Conservation Body (SNCB) or other relevant statutory body when undertaking this process.
- 4.25 Measures that result in a significant reduction in passenger capacity are unlikely to be considered to be appropriate as mitigation. There may be exceptional circumstances where the mitigation could have a significant benefit and warrant a small reduction in passenger capacity and function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the effects outweigh the marginal loss of capacity.
- 4.26 Compensation, by definition, does not reduce an adverse effect resulting from a development. However, the applicant should set out how residual impacts will be compensated for as far as practicable. The applicant should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.
- 4.27 Where residual impacts relate to HRA sites then the applicant must provide a derogation case, if required, in the normal way in compliance with the relevant legislation and guidance.

Decision making

- 4.28 The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met, the Secretary of State will apply the presumption in favour of the development.

Non-HRA residual impacts of CNGI

- 4.29 Where residual non-HRA impacts remain after the mitigation hierarchy has been applied, such impacts are unlikely to outweigh the urgent need for CNGI.

Therefore, in all but the most exceptional circumstances, it is unlikely that consent will not be refused on the basis of these residual impacts.

4.30 Accordingly, the Secretary of State will take as the starting point for decision-making that CNGI infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy which requires a clear outweighing of harm, exceptionality or very special circumstances, for example:

- Where development within a Green Belt requires very special circumstances to justify development;
- Where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs; and
- Where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.

HRA derogations for CNGI

4.31 Any HRA residual impacts will continue to be considered under the framework set out in the Habitats Regulations.

4.32 Where, following Appropriate Assessment, CNGI has residual adverse impacts on the integrity of sites forming part of the UK national site network, either alone or in combination with other plans or projects, the Secretary of State will consider making a derogation under the Habitats Regulations⁴⁴.

4.33 The Secretary of State will consider the particular circumstances of any scheme and the impacts on protected sites, but starting from the position that the national growth facilitated by the expansion of Heathrow (which is CNGI) is in principle, capable of amounting to imperative reasons of overriding public interest (IROPI) for HRAs.

4.34 For HRAs, where an applicant has shown there are no deliverable alternative solutions, and that there are IROPI, compensatory measures must be secured by the Secretary of State as the competent authority, to offset the adverse effects to site integrity as part of a derogation.

Environmental Impact Assessment

Following the Levelling Up and Regeneration Act 2023, a roadmap to bring forward EORs by the end of 2027 has been published.⁴⁵ Environmental assessment would still be required and if introduced relevant plans and projects would have to comply with such regulations. Until a new system is implemented, current legislation on environmental

⁴⁴ A derogation under Regulations 64 and 68 of The Conservation of Habitats and Species Regulations 2017

⁴⁵ [Environmental Outcomes Reports: Roadmap to reform - GOV.UK](#)

assessment continues to apply and references to assessments in Chapter 5 can be set out in an Environmental Statement.

- 4.35 Under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017⁴⁶ (the EIA Regulations) all Schedule 1 developments (which Heathrow Expansion would be) must be accompanied by a statement describing the aspects of the environment likely to be significantly affected by the project (an "Environmental Statement"⁴⁷).
- 4.36 The EIA Regulations specifically refer to effects on population, human health, biodiversity, land, soil, water, air, climate, the landscape, material assets and historic environment, and the interaction between them.
- 4.37 The EIA Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project and also of the measures envisaged for avoiding or mitigating significant adverse effects⁴⁸.
- 4.38 To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This could include information on matters such as employment, equality, biodiversity net gain, community cohesion, health and wellbeing.
- 4.39 When examining a proposal to which this NPS applies, the Examining Authority should ensure that likely significant effects at all stages of the project have been adequately assessed. The effects of any changes in operations, including the number of air traffic movements, during the construction and operational phases must be properly assessed and appropriate mitigation secured for any significant effects. Any requests for environmental information not included in the original Environmental Statement should be proportionate and focus only on likely significant effects. In this NPS, the terms 'effects', 'impacts' or 'benefits' should accordingly be understood to mean likely significant effects, impacts or benefits.
- 4.40 When considering significant cumulative effects, any Environmental Statement should provide information on how the effects of an applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, proposed projects whose consent is yet to be determined, as well as those already in existence if they are not part of the baseline).⁴⁹

⁴⁶ <https://www.legislation.gov.uk/uksi/2017/572/contents>

⁴⁷ <https://www.legislation.gov.uk/uksi/2017/572/regulation/14>

⁴⁸ [Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK](#)

⁴⁹ The applicant should refer to the Planning Inspectorate's advice on assessing cumulative effects: [Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK](#)

- 4.41 The Examining Authority should consider how significant cumulative effects, and the interrelationship between effects, might as a whole affect the environment, even though they may be acceptable when considered on an individual basis or with mitigation measures in place.
- 4.42 In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in their application which elements of the proposal have yet to be finalised, and the reasons why this is the case. Where some details are still to be finalised, applicants should set out, to the best of their knowledge, what the realistic worst case scenario of the proposed development may be (for example in terms of site area) and assess the potential adverse effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed.
- 4.43 Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate development consent requirements in the DCO.

Habitats Regulations Assessment

- 4.44 Prior to granting development consent, the Secretary of State as competent authority must comply with the duties under the Conservation of Habitats and Species Regulations 2017 (the “Habitats Regulations”). Under these regulations, if the competent authority considers that the proposed development is likely to have a significant effect (either alone or in combination with other plans or projects), on a European site which forms part of the UK National Site Network (Special Areas of Conservation and Special Protection Areas) or on a site to which the same protection is applied as a matter of policy,⁵⁰ and is not directly connected with or necessary to the management of that site, it must make an Appropriate Assessment of the implications for the site in view of the site’s conservation objectives.⁵¹ The applicant should also refer to this NPS’ sections on biodiversity, land use, and air quality. The competent authority must consult Natural England to ensure that impacts on European sites are adequately considered and should consider agreeing an Evidence Plan with Natural England to help determine the information required.⁵²
- 4.45 The applicant is required to provide sufficient information with their applications for development consent to enable the Secretary of State to determine whether there is a risk of significant effect on a European site on its own or in combination with other proposals. If it is concluded there is likely to be a significant effect, or such effects cannot be ruled out (alone or in combination), an Appropriate Assessment is required. The applicant should

⁵⁰ This includes listed or proposed Ramsar sites, potential Special Protection Areas, possible Special Areas of Conservation and sites used to compensate for adverse effect on habitats sites.

⁵¹ <https://www.legislation.gov.uk/ukxi/2017/1012/regulation/24>

⁵² [Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process, Annex H: Evidence Plans for Habitats Regulations Assessments of Nationally Significant Infrastructure Projects - GOV.UK](#)

include details of any measures that are proposed to minimise or avoid any likely significant effects on a European site, for use at Appropriate Assessment stage.

4.46 If an Appropriate Assessment for a proposed development covered by this NPS concludes that it is not possible to rule out an adverse effect on the integrity of a European site, the Habitats Regulations permits a derogation, subject to the proposal meeting three tests. These tests are (a) that there are no less damaging alternative solutions, (b) that there are imperative reasons of overriding public interest for the proposal going ahead, and (c) that necessary compensation measures will be put in place to ensure the overall coherence of the network of protected sites is maintained. At detailed design stage, and in so far as it may be necessary, the matters set out in this NPS will be relevant to determining whether there are alternative solutions and imperative reasons of overriding public interest, provided that the design remains consistent with the objectives of this NPS.

Equalities Impact Assessment

4.47 Chapter 1 sets out the work that the Department for Transport has carried out on equalities to inform the development of this NPS.

4.48 For any application to be considered compliant with this NPS, it must be accompanied by a project level Equality Impact Assessment examining the potential impact of that project on groups of people with protected characteristics. In order to benefit from the support of this NPS, the results of that project level Equality Impact Assessment must be within the legal limits and parameters of acceptability outlined in the Appraisal of Sustainability that informs this NPS.

Assessing alternatives

4.49 The applicant should comply with all legal obligations and policy set out in this NPS on the assessment of alternatives. In particular:

- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require Environmental Statements to include a description of the reasonable alternatives studied by the applicant which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, including a comparison of the environmental effects. The consideration of alternatives should be carried out in a proportionate manner and only alternatives that can meet the objectives set out in this NPS need to be considered;
- There may also be other specific legal obligations requiring the consideration of alternatives, for example, under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017; and
- There may be policies in this NPS requiring consideration of alternatives, for example the flood risk sequential test. Where there is a policy or legal requirement to

consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements and in a proportionate manner.

Biodiversity net gain

- 4.50 Biodiversity net gain delivers measurable improvements for biodiversity by requiring the creation, enhancement, maintenance and monitoring of habitats in association with developments. In addition to providing net gains for biodiversity, applicants should also identify and deliver appropriate opportunities for nature recovery and wider environmental enhancements.
- 4.51 The Environment Act 2021 contains provisions for a mandatory biodiversity net gain requirement for Nationally Significant Infrastructure Projects. These provisions were commenced on 7 May 2026 and apply to applications for development consent made on or after 2 November 2026. Defra has published a Biodiversity Gain Statement⁵³ which will have the same effect in respect of relevant applications as if it were part of this NPS. The Secretary of State will need to be satisfied that the biodiversity gain objective in the relevant Biodiversity Gain Statement has been met. For a Northwest Runway scheme the discharging authority for an updated biodiversity gain plan or phase biodiversity gain plans should be the Secretary of State in consultation with host local planning authorities.

Criteria for good design for airports infrastructure

- 4.52 The applicant should include design as an integral consideration from the outset of a proposal. The applicant should explain how the scheme design responds to the National Infrastructure and Service Transformation Authority (NISTA) four design principles of climate, people, place and value.
- 4.53 A good design should meet the principal objectives of the scheme by applying the mitigation hierarchy to avoid, mitigate, or as a last resort compensate for the identified problems and existing adverse impacts, by improving operational conditions, simultaneously minimising adverse impacts and contributing to the conservation and enhancement of the natural, built and historic environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account economic, social and environmental impacts. An applicant should have regard to appropriate guidance and plans, including national design guidance, International Civil Aviation Organisation (ICAO) Airport Planning Manual and to any successor documents.
- 4.54 Scheme design will be a material consideration in decision making. The Secretary of State will need to be satisfied that projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be, having regard to regulatory and other constraints and including accounting for natural hazards such as flooding. The Secretary of State will also need to

⁵³ [NSIPs: biodiversity gain statement for airports - GOV.UK](#)

be satisfied that extant security, customs and immigration measures are maintained or re-provided.

- 4.55 The applicant should be able to demonstrate in its application how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, the applicant should set out the reasons why the favoured choice has been selected. The Examining Authority and Secretary of State will take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security standards which the design has to satisfy. 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 service⁵⁴.

Costs

- 4.56 The relationship between cost and affordability for a scheme is governed by the parameters set out in the planning process (this NPS and any relevant DCO), the subsequent scheme design, the approach to delivery, the regulated funding of the airport and funding from other sources, and the need to comply with the Government's guidance on compulsory acquisition of land under the Planning Act 2008.⁵⁵ This guidance is relevant to any scheme that will require the compulsory acquisition of land, which is expected in relation to any scheme to which this NPS applies. That guidance sets out what a promoter must demonstrate if it is to be granted powers of compulsory acquisition - including in relation to impediments to a scheme and financial resources.
- 4.57 Under the Civil Aviation Act 2012, the Civil Aviation Authority (CAA) has a primary duty to carry out its economic regulation functions relating to airports in a manner which it considers will further the interests of users of air transport services (passengers and cargo owners) regarding the range, availability, continuity, cost and quality of airport operation services⁵⁶. Where appropriate, the CAA must do so by carrying out those functions in a manner which it considers will promote competition in the provision of airport operation services. In discharging this duty, the CAA made a market power determination in respect of Heathrow Airport in 2014, which concluded that the market power test in that Act had been met in respect of Heathrow Airport.
- 4.58 As a result, the current airfield operator (HAL) is subject to economic regulation by the CAA under the Civil Aviation Act 2012. The CAA granted an economic licence in 2014 that permits HAL to recover airport charges. That licence imposes conditions on HAL to address its market power and protect the interests of users. These conditions include a price control setting the 'maximum yield' per passenger that can be recovered by the operator of

⁵⁴ For further information, see 'Design and Planning' and for further information see Design Council

⁵⁵ [Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land](#)

⁵⁶ Airport operation services is defined in section 68 of the Civil Aviation Act 2012

Heathrow Airport through airport charges. The CAA sets this price control having conducted a process that scrutinises, among other things, the business plan submitted by HAL as the current licence holder and developed through constructive engagement with the airlines, as well as other submissions from airlines and stakeholders.

- 4.59 Given the longer-term nature of the capacity expansion programme and significant costs that will likely be involved, the Government will consider the affordability of any proposed expansion scheme as part of the DCO decision making process. Further, the CAA is consulting on how best to develop the regulatory framework for Heathrow Airport in a way that will incentivise the cost effective delivery of any final approved expansion scheme. The CAA plans to set out an updated approach in July 2026 and intends to consult further on this.
- 4.60 In developing the regulatory framework to support the delivery of any planning decision for capacity expansion, the CAA must do so in accordance with the primary duty set out in paragraph 4.57 and it must have regard to the matters required by the Civil Aviation Act 2012. These include:
- the need to secure that the licence holder is able to finance its provision of airport operation services; and
 - the need to promote economy and efficiency on the part of the licence holder in its provision of airport operation services.
- 4.61 In assessing the implications of expansion, analysis undertaken for the purposes of this NPS has highlighted the importance of affordability to the successful delivery of expansion at Heathrow. Where the costs of expansion lead to airport charges at Heathrow that, if passed through to passengers, would result in passenger charges being higher than is consistent with the scheme delivering appropriate net benefits, there is a risk that passenger demand for services at Heathrow could be adversely affected. This could reduce the effective utilisation of new capacity and weaken the extent to which the strategic objectives of expansion are realised.
- 4.62 The extent to which airlines respond to any increases in charges, will depend on a range of factors that are not fully known at this stage, including future market conditions and airline commercial strategies. Long-term demand outcomes are inherently uncertain. Nevertheless, this underlines that scheme costs and design choices can directly influence demand within the London airport system.
- 4.63 The applicant should demonstrate in its application for development consent how it considers its scheme to be “affordable”. This means that: (i) the costs and charges are no higher than necessary to deliver the requirements of the scheme; (ii) that the level of charges that would result from the costs of the scheme are financially sustainable for airlines and freight owners and (iii) that the level of charges to passengers that would be likely to result from the costs of the scheme would be consistent with the scheme delivering appropriate net benefits (that is after taking account of the additional costs of the scheme to

consumers and the benefits to consumers from the expected use of the additional new capacity and increases in connectivity, frequency and route choice for air transport services operating from the airport).

- 4.64 The applicant must provide sufficient information in the DCO application to enable the Secretary of State to understand, at a proportionate level, the likely implications of the scheme for costs and airport charges and the potential consequences for airline finances and passenger fees, including the key affordability risks and how these are proposed to be managed as the scheme develops, including where delivered in phases.
- 4.65 In considering compliance with this, the Secretary of State will take account of the applicant's access to relevant information, including whether the applicant is an incumbent operator, and will not require evidence that could not reasonably be obtained by the applicant acting diligently and transparently.
- 4.66 The applicant must undertake meaningful engagement with airlines (and relevant airline representative bodies) on affordability considerations, and must summarise that engagement in the application, including how it has informed the proposed scheme design, scope, phasing and cost.
- 4.67 The Secretary of State, with advice from the CAA, will consider the affordability of the proposed scheme as part of the DCO decision. This policy is not a substitute for, and does not displace, the subsequent and separate statutory role of the CAA and the applicable economic regulation regime. It will be the responsibility of the Department for Transport, working together with the CAA, to review information on affordability, including that provided by stakeholders. These will not be for the Examining Authority to consider.
- 4.68 The CAA's support and advice on affordability will be in addition to, and separate from, its role as a statutory consultee to the planning process. The CAA is a statutory consultee for all proposed applications relating to airports or which are likely to affect an airport or its current or future operation. The applicant is expected to provide the CAA with the information it needs to enable it to assist the Examining Authority in considering whether any impediments to the applicant's development proposals, insofar as they relate to the CAA's economic regulatory and other functions, are capable of being properly managed.

Climate change adaptation

- 4.69 The Planning Act 2008 requires the Secretary of State to have regard to the desirability of mitigating, and adapting to, climate change in designating an NPS.⁵⁷ Climate change mitigation is covered in Chapter 5.
- 4.70 This section sets out how the Heathrow Expansion NPS puts Government policy on climate change adaptation into practice, and in particular how the applicant and the Secretary of State will take into account the effects of climate change when developing and considering infrastructure applications

⁵⁷ Planning Act 2008, section 10(3)(a)

covered by this NPS. Climate change adaptation is essential to minimise the most dangerous impacts of climate change, as previous global greenhouse gas emissions will already mean some degree of continued climate change for at least the next 30 years. Climate change is likely to mean that the UK will experience on average hotter, drier summers and warmer, wetter winters. There is potentially an increased risk of flooding, drought, heatwaves, intense rainfall events and other extreme events such as storms and wildfires, as well as rising sea levels.

- 4.71 Adaptation is therefore necessary to deal with the impacts of these changes that are already happening. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the provision of green infrastructure.
- 4.72 In addition, Article 7 of the Paris Agreement establishes a global goal on adaptation – of enhancing adaptive capacity, strengthening resilience and reducing vulnerability to climate change in the context of the temperature goal of the Agreement. It aims to significantly strengthen national adaptation efforts, including through support and international cooperation.
- 4.73 To support planning decisions, the Government produces a set of UK Climate Projections, and every five years prepares a statutory UK Climate Change Risk Assessment and National Adaptation Programme.⁵⁸ In addition, the Climate Change Act 2008 adaptation reporting power has been used by Government to invite reporting authorities (a defined list of public bodies and statutory undertakers, including airports) to consider the impact on them of current and predicted climate change, and to report on progress implementing adaptation actions.⁵⁹ Successive strategies for adaptation reporting will be laid alongside five yearly updates to the National Adaptation Programme.
- 4.74 The Department for Transport's Climate Adaptation Strategy for Transport⁶⁰ also sets a vision for a climate-resilient transport system and contains actions to support transport operators, including airports, to understand and manage their immediate and long-term climate-related risks and vulnerabilities.
- 4.75 New infrastructure to deliver Heathrow expansion will be a long-term investment which will need to remain operational over many decades, in the face of a changing climate. Consequently, the applicant must consider the impacts of climate change when planning design, build and operation and the link between good design and the mitigation of adverse climate effects. The Department for Transport has published guidance on climate change risk assessments for the transport sector, including airports.⁶¹ Any accompanying Environmental Statement should include a climate change risk assessment, setting out how the proposal will take account of the projected impacts of

⁵⁸ Climate Change Act 2008, section 58

⁵⁹ Climate Change Act 2008, section 62

⁶⁰ <https://www.gov.uk/government/publications/climate-adaptation-strategy-for-transport/climate-adaptation-strategy-for-transport>

⁶¹ [Climate change risk assessment: transport sector - GOV.UK](#)

climate change and embed adaptation measures, using the guidance as necessary.

- 4.76 Detailed consideration must be given to the range of potential impacts of climate change using the latest UK Climate Projections available at the time, and to ensuring any Environmental Statement that is prepared identifies appropriate mitigation and adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of any Environmental Statement, the Examining Authority should consider whether it needs to request additional information from the applicant.
- 4.77 Where transport infrastructure has safety-critical elements, and the design life of the asset is 60 years or greater, the applicant should apply the latest available UK Climate Projections, considering at least a scenario that reflects a high level of greenhouse gas emissions at the 10%, 50% and 90% probability levels, to assess the impacts of climate change over the lifetime of the development.
- 4.78 The applicant should demonstrate that there are no critical features of infrastructure design which may be seriously affected by more radical changes to the climate beyond those projected in the latest set of UK Climate Projections. Any potential critical features should be assessed, taking account of the latest credible scientific evidence on, for example, sea level rise, and on the basis that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime through potential further mitigation or adaptation.
- 4.79 Any adaptation measures should be based on the latest set of UK Climate Projections,⁶² the most recent UK Climate Change Risk Assessment,⁶³ consultation with statutory consultation bodies, and any other appropriate climate projection data. Any adaptation measures must themselves also be assessed as part of any Environmental Impact Assessment and included in the Environmental Statement, which should set out how and where such measures are proposed to be secured.
- 4.80 If any proposed adaptation measures themselves give rise to consequential impacts, the Secretary of State will consider the impact in relation to the application as a whole and the assessment principles set out in this NPS.
- 4.81 Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so.
- 4.82 Where adaptation measures are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project or the surrounding environment, the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could

⁶² [UK Climate Projections \(UKCP18\) - Met Office](#)

⁶³ <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2022> - next assessment due in 2027

be implemented should the need arise, rather than at the outset of the development.

Pollution control and other environmental protection regimes

- 4.83 Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality or the marine environment, or which include noise, may be subject to separate regulation under the pollution control framework⁶⁴ or other consenting and licensing regimes. Relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated.
- 4.84 In deciding an application, the Secretary of State should focus on whether the development is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that, in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced. Decisions under the Planning Act 2008 should complement but not duplicate those taken under the relevant pollution control regime.
- 4.85 These considerations apply in an analogous way to other environmental regulatory regimes, including those on land drainage, flood defence, and biodiversity.
- 4.86 When an applicant applies for an environmental permit, the relevant regulator requires that processes are in place that are sufficient for the grant of the permit and to ensure compliance with conditions attached to any permit. In examining the impacts of the project, the Examining Authority may wish to seek the views of the regulator on the scope of the permit or consent and any management plans (such as any produced for noise) that would be included in an environmental permit application.
- 4.87 The applicant should begin pre-application discussions with the relevant regulator as early as possible. It is expected, however, that an applicant will have first considered what the relevant regulator is likely to require as a starting point for discussion. Some consents require a significant amount of preparation: as an example, the Environment Agency strongly recommends the applicant should start work towards submitting the permit application at least six months prior to the submission of a DCO application, where it wishes to parallel track the applications. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the Examining Authority and the Secretary of State. It is recommended that applicants take advantage of discretionary services offered by regulators to streamline the environmental permit process as far as possible. For example, the Environment Agency's Priority Tracked Service provides ongoing support

⁶⁴ <https://www.gov.uk/government/publications/integrated-pollution-prevention-and-control-developing-and-setting-of-best-available-techniques-bat-provisional-common-framework>

through a dedicated contact in aid of faster timeframes and more flexible decision making.

4.88 The Secretary of State will need to be satisfied that development consent can be granted taking full account of environmental impacts. This will require close cooperation with the relevant regulator, the local planning authority, and other relevant bodies, such as Natural England, Drainage Boards, and water and sewerage undertakers, to ensure that, in the case of potentially polluting developments:

- The relevant regulator is satisfied that potential releases can be adequately regulated under the pollution control framework; and
- The effects of existing sources of pollution in and around the project are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits.

4.89 The Secretary of State should not refuse consent on the basis of regulated impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted.

Common law nuisance and statutory nuisance

4.90 Section 158 of the Planning Act 2008 provides a defence of statutory authority in civil or criminal proceedings for nuisance. Such a defence is also available in respect of anything else authorised by an order granting development consent. The defence does not extinguish the local authority's duties under Part III of the Environmental Protection Act 1990 to inspect its area and take reasonable steps to investigate complaints of statutory nuisance and to serve an abatement notice where satisfied of its existence, likely occurrence or recurrence.

4.91 During the examination of an application for development consent for infrastructure covered under the Heathrow Expansion NPS, possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990 and under sections 76 and 77 of the Civil Aviation Act 1982 should be considered by the Examining Authority. Nuisance can include emissions such as dust, odour, artificial light, smoke and steam. The Examining Authority should also consider how those sources of nuisance might be mitigated or limited so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent.

4.92 The defence of statutory authority is subject to any contrary provision made by the Secretary of State in any particular case by an order granting development consent⁶⁵. The defence conferred by statutory authorisation is not intended to extend to proceedings where the matter is "prejudicial to health" and not a nuisance. When considering whether to include exceptions to the defence in

⁶⁵ Planning Act 2008, section 158(3)

an order granting development consent (section 158(3) of the Planning Act 2008), the Secretary of State should have regard to whether any nuisance is an inevitable consequence of the development.

Security and safety considerations

- 4.93 National security considerations apply across all national infrastructure sectors. The Department for Transport acts as the sector sponsor department for the aviation sector, and in this capacity has lead responsibility for security matters and for directing the security approach to be taken, working with the Civil Aviation Authority. The Department for Transport works closely with Government agencies, including the National Protective Security Authority, to reduce the vulnerability of the aviation sector to terrorism and other national security threats.
- 4.94 Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. The nature of the aviation sector as a potential target for terrorism and other threats means that security considerations will likely apply in the case of the infrastructure project for which development consent may be sought under the Heathrow Expansion NPS.
- 4.95 Where national security implications have been identified, the applicant should consult with relevant security experts from the National Protective Security Authority and the Department for Transport to ensure that physical, procedural and personnel security measures have been adequately considered in the design process, and that adequate consideration has been given to the management of security risks, including during the construction phase. If the Department for Transport, taking advice from the Civil Aviation Authority, National Protective Security Authority and others it considers appropriate, forms the opinion that it is satisfied that current and potential future security needs are adequately addressed in the project and that relevant guidance on these matters has been appropriately taken into account in the application, it will provide confirmation of this to the Secretary of State, and the Examining Authority should not need to give any further consideration to the details of the security measures during the examination.
- 4.96 The applicant should only include such security-related information in the application as is necessary to enable the Examining Authority to examine the development consent issues and make a properly informed recommendation on the application.
- 4.97 In exceptional cases where examination of an application would involve public disclosure of information about defence or national security which would not be in the national interest, the Secretary of State can intervene and may appoint one or more examiner to consider evidence in closed session.
- 4.98 There remains a considerable threat to aviation security from terrorism and other sources. The UK meets this threat with a multi-layered aviation security

regime built on intelligence, effective risk management and robust, proportionate measures, brought together under the National Aviation Security Programme. The regulations governing aviation security in the UK have their basis in UK and international law, and are enforced by the Civil Aviation Authority on behalf of the Secretary of State. The design, construction and operation of the Heathrow Northwest Runway scheme, to which this NPS relates, must comply with aviation security regulations and guidance in the same way as existing airports. There may also be other security considerations linked to any application for development consent under this NPS.

- 4.99 Air transport remains one of the safest modes of travel globally, and the UK continues to uphold its reputation as a world leader in aviation safety. Maintaining and strengthening these high standards, while ensuring that safety regulation is proportionate, evidence-based, and cost-effective, remains of primary importance to the UK. This work is supported by close collaboration with international aviation safety partners to promote consistent global standards. The UK's civil aviation safety regime, established in domestic legislation and shaped by international obligations, sets the requirements for the safe operation of aircraft, airports, and airspace, providing the framework through which risks are managed, operators are certified, and compliance is assured through rigorous oversight. Accordingly, the applicant's scheme must fully comply with the UK's civil aviation safety regime, overseen by the Civil Aviation Authority.

Health

- 4.100 The construction and use of infrastructure covered by this NPS has the potential to affect people's health⁶⁶, wellbeing and quality of life. Infrastructure can have direct effects on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests.
- 4.101 New or enhanced infrastructure covered by this NPS may also have indirect health effects, for example if they affect access to key public services, local transport, opportunities for active travel, or the use of open space for recreation and physical activity. It should also be noted, however, that beneficial health impacts may be expected from employment and income generation, and education, skills and training opportunities.
- 4.102 As described elsewhere in this NPS, where the proposed project has likely significant environmental impacts that would have an effect on population and human health, any Environmental Statement should identify and set out the assessment of any likely significant health effects, using the Institute of Sustainability and Environmental Professionals (ISEP) guidance.⁶⁷

⁶⁶ Health impacts include impacts on mental health.

⁶⁷ ISEP Guide: Effective Scoping of Human Health in Environmental Impact Assessment (2022) and ISEP Guide: Determining Significance For Human Health In Environmental Impact Assessment (2022)

- 4.103 The applicant should identify measures to avoid, reduce or compensate for adverse health effects as appropriate and proportionate. The effects on people may occur simultaneously, so the applicant, the Examining Authority and the Secretary of State (in determining an application for development consent) should consider the cumulative effects on health, including how airport activities influence the broader quality of life experienced by local communities, and the ability of monitoring to recognise unforeseen significant health effects and the effectiveness of mitigation measures.
- 4.104 Chapter 1 sets out the work that the Department for Transport has carried out to assess the health effects of the proposed scheme to inform the development of this NPS. In order to be compliant with this NPS, a further project level Health Impact Assessment is required. The application should include and propose health mitigation and monitoring, which seeks to maximise the health benefits of the scheme and mitigate any negative health effects.

Accessibility

- 4.105 The Government is committed to a more accessible and inclusive transport network. This applies to any new infrastructure covered by this NPS, and should support disabled people and others with reduced mobility to travel with dignity and ease throughout their whole journey.
- 4.106 Regulation 1107/2006⁶⁸ and associated guidance set out the rights of disabled passengers travelling by air and the obligations on airports, including in relation to assistance services, quality standards and the design of new or refurbished infrastructure. The CAA monitors airport performance against these requirements. In addition, the relevant recommendations of the Aviation Accessibility Task and Finish Group⁶⁹ should also be considered in the design and operation new infrastructure covered by this NPS.
- 4.107 The applicant should explain how accessibility has been considered from the outset in the design and operation of the scheme, including surface access. This should include engagement with people with lived experience, consideration of a wide range of access needs (including non-visible disabilities), and clear plans for meeting expected demand for accessibility services arising from expansion. Surface access proposals should also address accessibility across relevant modes, including road, rail, bus, coach and car access, parking, drop-off and transfer arrangements.
- 4.108 The CAA, as the sector regulator is responsible for enforcing Regulation 1107/2006. It has published extensive guidance⁷⁰ to the industry⁷¹ on

⁶⁸[Regulation \(EC\) No 1107/2006 of the European Parliament and of the Council of 5 July 2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air \(Text with EEA relevance\)](#)

⁶⁹ [Aviation Accessibility Task and Finish Group report - GOV.UK](#)

⁷⁰ [CAP 1411 - CAA guidance for airports on providing assistance to people with hidden disabilities](#)

⁷¹ [CAP 2374 – Additional guidance on the assistance service at UK airports](#)

accessibility requirements which should be followed to meet accessibility requirements⁷².

4.109 In accordance with legal and best practice in relation to accessibility:

- The Government also requires the applicant to provide clear details of how the accessibility service will meet demand. This should include realistic forecasting of demand for the service, resource requirements and delivery plans;
- The applicant should work with providers to ensure accessible road, rail and bus options; and
- The car will continue to play an important role, providing disabled people with independence where other forms of transport are not accessible or available. Easy access and car parking provision at airports is essential to this goal and must meet standards set down in guidance (such as the Department for Transport's Inclusive mobility: making transport accessible for passengers and pedestrians)⁷³. Furthermore, clear plans for accessible car park transfers, drop-off provisions and access call points must be included.

Place making

4.110 The land and surrounding development required to deliver the Northwest Runway, and any associated infrastructure, will directly impact neighbouring local authorities in the area. Delivering the scheme will give rise to residential displacement and loss of housing, loss of community facilities and assets across the wider area, including schools, nurseries, places of worship, recreational spaces and local businesses. Alongside this there are likely to be indirect effects on access to services, social networks community cohesion and overall quality of life. It is therefore important that any scheme put forward by an applicant has been developed with any local authorities impacted by the land take required by the development to minimise these impacts where possible. This should include engagement with local authorities on the local needs of the area.

4.111 An applicant should demonstrate how it has worked with local authorities to develop the scheme. Including demonstrating how, where relevant the scheme can contribute and be integrated with wider place making and how land has been used efficiently to limit impacts of displacement of existing communities, including residential displacement, loss of community facilities and assets across the wider area including schools, nurseries, places of worship, recreational spaces and local businesses and enables local authorities to deliver local needs for the area.

4.112 In considering how the scheme can be integrated with wider place making, an applicant will need to demonstrate how they have considered local communities not just within the Order Limits, but also those beyond the Order Limits where appropriate so that the full footprint of impacts and mitigation can

⁷² [CAP1228: Guidance on quality standards under Regulation EC 1107/2006 | UK Civil Aviation Authority](#)

⁷³ [Inclusive mobility: making transport accessible for passengers and pedestrians - GOV.UK](#)

be taken into account. These impacts could include severance of communities, townscape impacts, loss of amenity, construction disruption and changes to access to services through the local area.

5. Assessment of impacts

Introduction

- 5.1 This chapter focuses on the potential impacts of the Heathrow Northwest Runway scheme, the assessments that any applicant will need to carry out, and the specific planning requirements that they will need to meet, in order to gain development consent.
- 5.2 The list of impacts and the relevant policy in this part of the NPS is not exhaustive. The NPS addresses those impacts and means of mitigation that are anticipated to arise most frequently. They are not intended to provide a list of all possible effects or ways to mitigate such effects. The Secretary of State should therefore consider other impacts and means of mitigation where they determine that the impact is relevant and important to its decision.
- 5.3 Sufficient relevant information is crucial to good decision making, particularly where formal assessments are required. To avoid delay any applicant should discuss what information is needed with the Planning Inspectorate, statutory bodies, and other relevant organisations as early as possible. Any assessment should be based on the most up to date data and guidance.

Air quality

Introduction

- 5.4 In recent years there has been significant progress in reducing background concentrations of nitrogen oxides (NO_x) and Particulate Matter (PM) pollutants due to modernisation of transport fleets. In the latest report of compliance, the London agglomeration meets all limit values for nitrogen dioxide (NO₂), and for PM₁₀ and PM_{2.5} (particles of less than 10 and 2.5 micrometres in diameter respectively) set in the Air Quality Standards Regulations 2010.⁷⁴ However, increases in emissions of pollutants during the construction and operational phases of a scheme to expand Heathrow airport could result in the

⁷⁴ Air Pollution in the UK 2024 https://uk-air.defra.gov.uk/library/annualreport/viewonline?year=2024_issue_1#report_pdf and [The Air Quality Standards Regulations 2010](#)

worsening of local air quality, which can contribute to adverse impacts on human health and on the natural environment. Expansion of Heathrow Airport through a Northwest Runway will lead to a rise in the number of flights in the local area compared to a no expansion scenario and therefore could further contribute to adverse impacts. This is why ensuring that Heathrow expansion meets the UK's air quality obligations is one of the Government's four tests.

- 5.5 In addition to limit values set out in the Air Quality Standards Regulations 2010 and reiterated in the Government's Air Quality Strategy,⁷⁵ two PM2.5 targets for 2040 – one for annual mean concentrations and one for population exposure reduction – have been set under the Environment Act 2021⁷⁶ and The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023.⁷⁷ Local authorities and relevant public authorities must also meet local air quality objectives under the Environment Act 1995.⁷⁸ Additionally the Government has legally binding targets through the National Emission Ceilings Regulations 2018⁷⁹ to reduce emissions of five key air pollutants by 2030 including PM2.5 and NOx.

Air quality impact of Heathrow expansion

- 5.6 Air quality impacts are generated by all types of infrastructure development and its subsequent use to varying degrees, and the geographical extent and distribution can cover a large area. The Airports Commission undertook extensive analysis on the air quality impacts of Heathrow expansion reported in its 2015 report,⁸⁰ including the possible impacts of identified mitigations. Building on this, the then Government undertook its own analysis and set out its view in the 2018 Airports NPS that, with a suitable package of policy and mitigation measures, including the Government's modified air quality plan,⁸¹ the Heathrow Northwest Runway scheme would be capable of being delivered without impacting the UK's compliance with air quality limit values at that time.
- 5.7 To inform this draft NPS, the Department for Transport commissioned indicative analysis (rather than full modelling) to review emissions source data and trends for road and aircraft related activity around Heathrow Airport since the 2018 Airports NPS was designated to assess whether that conclusion was still valid. In addition, the analysis includes consideration of PM2.5 targets not in place at the time of the 2018 Airports NPS, and a literature review of the current evidence base regarding ultrafine particles (UFPs).⁸²

⁷⁵ [The air quality strategy for England - GOV.UK](#)

⁷⁶ [Environment Act 2021](#)

⁷⁷ [The Environmental Targets \(Fine Particulate Matter\) \(England\) Regulations 2023](#)

⁷⁸ [Environment Act 1995](#)

⁷⁹ [The National Emission Ceilings Regulations 2018](#)

⁸⁰ The Airports Commission's Appraisal Framework published in 2014 ([airports-commission-appraisal-framework.pdf](#)) indicated that consideration should be given in its analysis to emissions of NOx, NO2, PM10 and PM2.5. The Airports Commission's 2015 report is published here: [Airports Commission: final report](#) Analysis for the 2018 Airports NPS and this NPS have adopted the same scope.

⁸¹ <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

⁸² The indicative analysis is set out in four air quality annexes to the Appraisal of Sustainability of the draft HENPS, which are available here: <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-appraisal-of-sustainability>

- 5.8 The indicative analysis suggests that, based on current evidence, the Government's conclusions for NO₂ and PM₁₀ impacts for the 2018 ANPS can be applied to the position as at 2026 (subject to the uncertainties identified in the analysis). Monitoring data indicate that NO₂ and PM₁₀ concentrations around Heathrow have generally decreased since 2018. While tailpipe emissions from road vehicles of these pollutants have generally decreased since 2018, and projections for 2030 and years beyond 2030 predict that emissions rates from vehicles are lower than previously assumed across most road types, other input assumptions and tools used in the 2018 analysis of NO_x and NO₂ have not been reassessed at this time. Despite notable improvements in the emissions impact of ground support equipment due to electrification, and auxiliary power unit usage due to increased operating restrictions at the airport, the trend towards heavier aircraft, and increased activity due to a runway expansion means that long term adverse air quality effects cannot be ruled out. Further detailed analysis conducted in any applicant's Environmental Statement will quantify these effects, and any necessary mitigations, using updated tools.
- 5.9 The impacts of the scheme on local PM_{2.5} concentrations were not quantified by the Airports Commission or the 2018 Airports NPS and therefore a preliminary assessment of road and aircraft related emissions has been undertaken to predict future contributions at existing PM_{2.5} monitoring locations around the airport (national and local authority monitors). This indicative analysis suggests no new exceedances of PM_{2.5} targets at these locations because of Heathrow expansion but suggests one existing monitoring site location could exceed targets even without expansion. This analysis makes various conservative assumptions, which may result in higher concentrations being predicted than will be the case in reality. Furthermore the impact of expansion on PM_{2.5} concentrations is assessed to be minimal in the scenario with illustrative surface access targets compared to the without-expansion scenario. The Government would expect the applicant to carry out more detailed modelling of future PM_{2.5} concentrations to identify the potential magnitude of change (due to the expansion) across the assessment region, not just at existing monitoring site locations, in order to establish the locations where the impacts will be greatest and the area and subsequent exposure associated to such levels. In line with Defra guidance, an applicant's focus should be on identifying key sources of air pollution within a scheme and providing evidence that they have taken appropriate action to minimise emissions of PM_{2.5} and its precursors as far as is reasonably practicable. However, in the case of a major development, modelling should also be used as a guide to assess where more targeted mitigation is required.
- 5.10 In recent years UFP emissions from airports have also become a topic of interest in relation to large airports close to residential areas due to the links between UFP exposure and adverse health effects. We have considered the latest evidence presented in the literature review and reflected it in the sections below. Currently, there are no legally binding objective concentrations for UFPs and monitoring is less widespread.

Applicant's assessment

5.11 The applicant should undertake an assessment of the project as part of the Environmental Impact Assessment, of where its impacts (both within and outside the site boundary) are likely to have a significant effect on air quality in compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, or affect the UK's ability to comply with statutory air quality limits, objectives and targets.

5.12 The Environmental Statement should assess:

- Existing air quality emissions and concentrations;
- Forecasts of emissions and concentrations of all relevant air quality pollutants at the time of opening, (a) assuming that the scheme is not built (the 'future baseline'), and (b) taking account of the impact of the scheme, including when at full capacity;
- Current evidence and assessment in relation to the impact of UFPs;
- Any likely significant air quality effects of the scheme, their mitigation and any residual likely effects, distinguishing between those applicable to the construction and operation of the scheme and taking account of the impact of any road traffic generated by the project;
- The modelled emissions, concentration change and absolute concentrations of the proposed project after mitigation methods have been applied;
- Any potential impacts on nearby designated habitats from air pollutants;
- The proximity and nature of nearby receptors which could be impacted, including those more sensitive to poor air quality; and
- Any cumulative effects in respect of air quality including in respect of health.

5.13 In addition, applicants should consider The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 by following available Defra planning guidance, including interim guidance.⁸³ This guidance sets out that a new approach is required for these targets that moves away from a requirement to assess solely whether a scheme is likely to lead to an exceedance of a legal limit and instead ensures that there is an appraisal of the key sources of emissions and the potential scale of impact (i.e. exposure), and appropriate mitigation measures are implemented from the design stage, streamlining the process for planning and ensuring the minimum amount of pollution is emitted and that exposure is minimised.

5.14 Defra publishes estimates of historic emissions and future projections of UK air pollutant emissions. Estimates are updated annually reflecting changes in the evidence and are the basis for national concentration modelling. The applicant's assessment should use the latest available data and be consistent

⁸³ [PM_{2.5} Targets: Interim Planning Guidance - DEFRA UK Air - GOV.UK](#)

with Defra's approach and may include more detailed local modelling to demonstrate local impacts.

Mitigation

- 5.15 Where a project is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, the applicant should work with the relevant authorities to secure appropriate mitigation measures. Where a project is located within, or in close proximity to, an Air Quality Management Area (AQMA) applicants should engage with the relevant local authority to ensure the project is compatible with the Local Air Quality Action Plan. Heathrow Airport is inside London's Ultra Low Emission Zone and is in close proximity to several AQMAs therefore a promoter should work with Transport for London and the Greater London Authority, and local authorities in Hillingdon, Hounslow, Slough and Spelthorne in particular.
- 5.16 With respect to The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, the applicant should take all reasonable steps to reduce emissions of PM2.5 and its precursor pollutants in the construction and operational stage of the development by following available Defra guidance. With respect to all other relevant statutory air quality limits, objectives and targets, all reasonable mitigation action should be taken, and at a minimum, the proposed mitigation measures should ensure that the net impact of a project does not delay compliance with those objectives.
- 5.17 Where a scheme is expected to lead to a deterioration of air quality the applicant should justify with robust evidence why the level of mitigation proposed is deemed to be reasonable.
- 5.18 In all cases, the Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage. A management / project plan may help record and secure mitigation measures.
- 5.19 Mitigation measures may affect the project design, layout, construction and operation, and / or may comprise measures to improve air quality beyond the immediate locality of the scheme.
- 5.20 While the precise package of mitigations should be subject to consultation with local communities and relevant stakeholders, to ensure the most effective measures are taken forward, an extensive range of measures to mitigate air quality impacts of a Northwest Runway scheme will be required in respect of contributions from air; surface access arrangements including for passengers, road freight and staff travel; airport operations; and during construction.
- 5.21 In respect of the provision of surface access to the Northwest Runway scheme, the applicant must set out and regularly review its plans to meet the mode share targets set out in the Surface Access section of this NPS. The Secretary of State, when considering any application for development consent,

would also expect to see evidence that the following measures to mitigate the air quality impacts of surface access have been considered:

- A surface access strategy that incentivises mode shift to public transport and active travel, and prioritises environmental sustainability, in line with the requirements set out in the Surface Access section of this NPS;
- Zero- or low-emission hybrid or electric vehicle charging and fuel facilities including for coaches, buses, taxis, private hire vehicles and heavy goods vehicles;
- Changes to the layout of surface access arrangements;
- Traffic restrictions and / or traffic relocation around sensitive areas, including speed control on roads;
- An emissions-based access charge with higher charges for vehicles that produce more emissions (both tailpipe and non-tailpipe);
- A strategy for the minimisation of air quality impacts from road freight; and
- Physical means, including barriers to trap or better disperse emissions.

5.22 The Secretary of State, when considering any application for development consent would expect to see evidence that the following measures to mitigate the air quality impacts of airport operations have been considered:

- Landing charges structured to reward airlines for operating cleaner flights (for example NO_x emissions charging);
- Zero- or low-emission hybrid or electric vehicle use (ultra-low emission vehicles), charging and fuel facilities;
- Removal of all diesel sources of emissions from the airport;
- Improved taxiing efficiency, through reduced or single engine taxiing, and including the electrification of push back tugs in scheme designs (both of which could also reduce noise and carbon impacts);
- Reducing emissions from aircraft at the gate (for example installation of fixed electrical ground power and preconditioned air to aircraft stands to reduce the use of auxiliary power unit);
- Modernised heating supplies in airport buildings; and
- The installation of appropriately sited and quality assured ultrafine particles monitoring equipment.

5.23 Mitigation measures at the construction stage must draw on best practice from other major construction schemes, including during the procurement of contractors to minimise air quality impacts. The Secretary of State, when

considering any application for development consent, would expect to see evidence that the following measures to mitigate the air quality impacts of construction operations have been considered:

- Development of a construction traffic management plan (which may include the possible use of rail and consolidation sites);
- The use of low emission construction plant / fleet, fitting of diesel particulate filters, and use of cleaner engines;
- The use of freight consolidation sites;
- Active workforce management / a worker transport scheme;
- Construction site connection to grid electricity to avoid use of mobile generation; and
- Selection of construction material to minimise distance of transport and increase recycling percentages of the material where appropriate.

5.24 The Secretary of State also expects the applicant to provide evidence of the consideration of other measures in addition to those listed at paragraphs 5.21 to 5.23 where they could mitigate the air quality impacts of the Northwest Runway scheme. The implementation of mitigation measures may require working with partners to support their delivery.

Decision making

5.25 The Government has been clear that any proposed scheme must meet four tests, including that it will not adversely impact our ability to comply with the UK's legal obligations on air quality. While a deterioration in air quality in itself is not necessarily a reason to refuse development consent, to meet the Government's air quality test the Secretary of State must be satisfied that - with appropriate mitigation, surface access strategies and operational measures - the scheme would not cause air quality impacts that result in any new breaches of legal obligations on air quality or make existing breaches materially worse.

5.26 These legal obligations include meeting National Emissions Ceilings Regulations (NECR 2018) or exceeding standards set through the Air Quality Standards Regulations (2010) or hindering the Government's ability to achieve compliance with The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. For the latter, this includes identifying key sources of emissions and the potential scale of impact, demonstrating that an applicant has taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable, and implementing appropriate mitigations to minimise PM2.5 exposure for development users and people who will be exposed, in line with Defra guidance.

5.27 The Secretary of State should also consider what monitoring and enforcement is required to ensure that the residual air quality impacts related to a proposed

scheme (after mitigation) do not exceed projections as well as monitoring of emerging pollutants of concern such as UFP.

5.28 As part of the application of this test the Secretary of State will consider air quality impacts over the wider area likely to be affected, as well as in the vicinity of the scheme. This should be considered in the context of Local Air Quality Management (LAQM) duties placed on local authorities under the Environment Act 1995. Proposals of this scale may place significant additional demands on local authorities responsible for monitoring, assessment and delivery of local air quality improvements. Applicants should therefore demonstrate how they will support effective local implementation of mitigation, including alignment with existing Air Quality Action Plans and minimising additional burdens on local authority resources.

Noise

Introduction

5.29 The Government recognises that the impact of noise from airport expansion is a key concern for communities affected, which is why it is one of its four tests for expansion. Over recent decades, there have been reductions in aviation noise due to technological and operational improvements, and this trend is expected to continue in the medium term with UK aviation noise forecast to reduce in the order of 35% by 2035 compared to 2019.⁸⁴ Newer generation aircraft coming into service have a noise footprint typically 50% smaller on departure than the ones they are replacing, and at least 30% smaller on arrival.⁸⁵

5.30 However, despite improvements in aircraft noise, recent evidence suggests that people's sensitivity to noise has increased and that exposure to aircraft noise can adversely affect people's health.⁸⁶ The Aviation Night Noise Effects study (ANNE)⁸⁷ considered how noise impacts vary at different times of night, and the Aviation Noise Attitudes Survey (ANAS)⁸⁸ gathered data on experiences of exposure to daytime aviation noise. These studies suggest that people are more annoyed by aviation noise and at lower levels than previous evidence indicated.

⁸⁴ The Sustainable Aviation Noise Roadmap, A Blueprint for Managing Noise from Aviation Sources to 2050: https://www.sustainableaviation.co.uk/wp-content/uploads/2025/02/SA_QuieterRoadmap_Report_Feb25.pdf/

⁸⁵ UK Airspace Policy: A framework for balanced decisions on the design and use of airspace, p24, para 3.11

⁸⁶ CAP 1164, Aircraft noise, sleep disturbance and health effects 2014: http://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=6275CAP_1506, Survey of noise attitudes 2014: Aircraft <http://www.gov.uk/government/publications/survey-of-attitudes-to-aviation-noise>

⁸⁷ <https://www.gov.uk/government/publications/aviation-night-noise-effects-anne-study>

⁸⁸ <https://www.caa.co.uk/data-and-publications/publications/documents/content/cap3131/>

- 5.31 Aircraft noise is not only determined by engine technologies and airframe design, but the paths the aircraft take when approaching and departing from the airport, and the way in which the aircraft are flown. The UK's Airspace Modernisation Strategy published by the Civil Aviation Authority (CAA) sets out the ambition and objectives for modernising UK airspace out to 2040 with the aim of delivering quicker, cleaner and quieter journeys for users and those affected by airspace.⁸⁹
- 5.32 Although aircraft operations are by far the largest source of noise emissions from an airport, noise will also be generated from ground operations and surface transport, and during the construction phase of a scheme.
- 5.33 This section sets out how the Government has considered recent evidence, alongside its own analysis of the impacts of Heathrow expansion, to propose a noise test for expansion.

Current UK noise policy and the impact of Heathrow expansion

- 5.34 There is no national legislation which sets legally binding limits on aviation noise emissions, however major airports are under a legal obligation⁹⁰ to develop strategic noise maps and produce Noise Action Plans on a five yearly basis. They are also required to review and, if necessary, revise action plans when a major development occurs affecting the existing noise situation. The Government also expects the noise-designated airports (Heathrow, Gatwick and Stansted)⁹¹ to produce noise exposure maps on an annual basis.
- 5.35 The Government's Noise Policy Statement for England⁹² promotes good health and quality of life through effective noise management, and similar considerations apply to vibration. In this document, in line with the Environment Protection Act 1990, references below to "noise" apply equally to assessment of impacts of vibration. In addition, the Government's overarching aviation noise policy⁹³ is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation's Balanced Approach to Aircraft Noise Management.⁹⁴ The 'Balanced Approach' is given legal effect in the UK through EU Regulation 598/2014 (assimilated into UK law).⁹⁵

⁸⁹ Airspace Modernisation Strategy, Civil Aviation Authority <https://www.caa.co.uk/commercial-industry/airspace/airspace-modernisation/airspace-modernisation-strategy/>

⁹⁰ Environmental Noise (England) Regulations 2006 (S.I. 2006/2238 as amended)

⁹¹ These airports are designated for the purposes of noise regulation under the Civil Aviation Act 1982.

⁹² [Noise policy statement for England - GOV.UK](#)

⁹³ Overarching aviation noise policy, 2023 <https://www.gov.uk/government/publications/aviation-noise-policy-statement/overarching-aviation-noise-policy>

⁹⁴ 'Balanced Approach' refers to the process developed by the International Civil Aviation Organization under which the range of available measures, namely the reduction of aircraft noise at source, land-use planning and management, noise abatement operational procedures and operating restrictions, is considered in a consistent way with a view to addressing the noise problem in the most cost-effective way on an airport-by-airport basis.

⁹⁵ <https://www.legislation.gov.uk/eur/2014/598>

- 5.36 EU Regulation 598/2014 also sets out a procedure for the adoption of noise-related operating restrictions at airports.⁹⁶ The Secretary of State for Transport when taking decisions on whether to grant development consent under the Planning Act 2008, is designated as the Competent Authority under the Airports (Noise-related Operating Restrictions) (England and Wales) Regulations 2018 responsible for ensuring that the measures in the EU Regulation 598/2014 are carried out appropriately. This includes ensuring that any noise problem is identified, and that where a noise problem is identified, a noise abatement objective is defined to address the problem, including appropriate consultation. There is already a night-time noise abatement objective in place for Heathrow which was set for the current night flight regime⁹⁷ and this will be reviewed in 2027.
- 5.37 The population affected by noise impacts from Heathrow is the highest of any airport in the UK or the European Union, with 359,700 households being subject to daytime aviation noise at a level of 51 dB LAeq,⁹⁸16h or more and 305,400 households⁹⁹ being subject to nighttime aviation noise at a level of 45 dB LAeq,8h or more in 2024.¹⁰⁰ These noise impacts are managed through Heathrow Airport Limited's Noise Action Plan 2024 – 2028,¹⁰¹ (which is drawn up in its role as a competent authority under the Environmental Noise (England) Regulations 2006 and has been approved by the Secretary of State for Environment, Food and Rural Affairs), and through noise controls set by the Government using powers in section 78 of the Civil Aviation Act 1982. These controls include limits on night flights. Expansion of Heathrow will increase the number of flights and so has the potential to increase adverse noise effects.
- 5.38 The Government has commissioned analysis of the potential noise impacts of the Northwest Runway scheme used to inform this NPS. For this analysis the Government has used an 'indicative' flight path design produced for the Airports Commission which, following discussion with Heathrow Airport Limited (as current airport operator) and NATS, it considers is the most relevant and reasonable basis to assess noise impacts of the scheme, given the early stage of the airspace design process and information available at this time. The development of modernised airspace designs needed for a new Northwest Runway at Heathrow is ultimately the responsibility of the UK Airspace Design Service (UKADS) considering the Government's revised Airspace Navigation

⁹⁶ For the purposes of EU Regulation 598/2014, an airport means an airport which has more than 50,000 civil aircraft movements per calendar year (a movement being a take-off or landing), on the basis of the average number of movements in the last three calendar years before the noise assessment

⁹⁷ [Decision: Night flight restrictions at Heathrow, Gatwick and Stansted from October 2025](#)

⁹⁸ LAeq is a noise measurement metric defined as the A-weighted Equivalent Continuous Sound Level, representing the average noise level experienced over a specified period as a single value in decibels (dB). It is expressed as LAeq,16h for the 16-hour daytime period (07:00-23:00) and LAeq,8h for the 8-hour nighttime period (23:00-07:00), and has historically been calculated over the 92-day summer period from 16 June to 15 September inclusive

⁹⁹ Based on a standard modal split (78 west, 22 east)

¹⁰⁰ Noise annex to the Appraisal of Sustainability of the draft HENPS available here: <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-appraisal-of-sustainability>

¹⁰¹ https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/noise/making-heathrow-quiter/noise-action-plan/Heathrow_NAP_2024-2028.pdf

Directions (AND) 2026 and Air Navigation Guidance (ANG) 2026, which were consulted upon between November 2025 and January 2026. The revised AND and ANG and the Consultation Response Document are due to be published shortly. These documents will inform the CAA's Airspace Change process (CAP1616) which the UKADS will follow when developing the airspace design for London, including that required for the Northwest Runway.

5.39 The Government's analysis of the proposed Northwest Runway scheme shows that when modelled for future years, overall noise exposure can be limited to no greater than 2024 noise levels despite additional flights. Much of the reduction in aviation noise is due to the introduction of newer, quieter aircraft types already in service, with conservative noise improvement assumptions applied to future generation aircraft. Noise impacts can be further reduced with mitigations such as the night flight ban and careful airspace design. Further detail on the noise analysis can be found in the noise annex of the Appraisal of Sustainability.¹⁰² Although overall noise impacts can be limited to being no greater than 2024 levels, the Government recognises that the underlying nature of impacts would change. The total number of flights to and from Heathrow would increase and while some areas would experience lower levels of noise, others would experience increases.

Applicant's assessment

5.40 Pursuant to the terms of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017,¹⁰³ the applicant should undertake a noise assessment for any period of change in air traffic movements prior to opening, for the time of opening, and at the time the airport is forecast to reach full capacity, and (if applicable, being different to either of the other assessment periods) at a point when the airport's noise impact is forecast to be highest. This should form part of the Environmental Statement. The noise assessment should include the following:

- A description of the noise sources;
- An assessment of the likely significant effect of predicted changes in the noise environment on any noise sensitive premises (including schools and hospitals) and noise sensitive areas (including National Parks and National Landscapes);
- The characteristics of the existing noise environment, including noise from aircraft, using noise exposure maps, and from surface transport and ground operations associated with the project, the latter during both the construction and operational phases of the project;
- A prediction on how the noise environment will change with the proposed project; and

¹⁰² <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-appraisal-of-sustainability>

¹⁰³ Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (S.I. 2017/572)

- Measures to be employed in mitigating the effects of noise.

5.41 These should take into account construction and operational noise (including from surface access arrangements) and aircraft noise. The applicant's assessment of aircraft noise should be undertaken in accordance with the developing indicative airspace design which may be different from those that informed the noise assessment undertaken to support this NPS. This may involve the use of appropriate design parameters and scenarios based on indicative flightpaths.

5.42 Operational noise, with respect to human receptors, should be assessed using the principles of relevant legislation, policy and guidance. For the prediction, assessment and management of construction noise, reference should be made to relevant British Standards and other guidance which give examples of mitigation strategies. In assessing the likely significant impacts of aircraft noise, the applicant should have regard to the noise assessment principles, including noise metrics, set out in the national policy on airspace.¹⁰⁴

Mitigation

5.43 The Government recognises that predictable periods of relief from aircraft noise (known as respite) are important for communities affected, and that noise at night is widely regarded as the least acceptable aspect of aviation noise for those communities.

5.44 While the package and detail of noise mitigation measures should be subject to engagement with local communities and other stakeholders to ensure the most appropriate and effective measures are taken forward, the Government expects the applicant to make efforts to avoid significant adverse noise impacts and mitigate other adverse noise impacts as a result of the Northwest Runway Scheme and Heathrow Airport as a whole. The Secretary of State will consider whether the mitigation measures put forward by the applicant following engagement with local communities are acceptable. The applicant will need to specifically deliver appropriate mitigation measures set out in paragraphs 5.45 to 5.47 below.

5.45 The applicant must put forward plans for a noise envelope.¹⁰⁵ Such an envelope should be tailored to local priorities and include clear noise performance targets. As such, the design of the envelope should be defined with engagement with local communities and relevant stakeholders, and take account of relevant Civil Aviation Authority guidance.¹⁰⁶ The benefits of future technological improvements to aircraft in respect of aircraft noise should be shared between the applicant and its local communities, hence helping to achieve a balance between growth and noise reduction. Suitable review

¹⁰⁴ [UK airspace policy - GOV.UK](#)

¹⁰⁵ A noise envelope is a means of setting a limit for noise for a given period, and of identifying relevant metrics and performance indicators that can help an airport track and manage noise, and provide transparency and accountability to local communities

¹⁰⁶ Civil Aviation Authority, Noise Envelopes – the definition of a noise envelope concept December 2013, or any successor document.

periods should be set following engagement with the parties mentioned above to ensure the noise envelope's framework remains relevant.

- 5.46 The applicant must put forward as part of their application, plans for a runway alternation scheme that would continue to provide communities affected with predictable periods of respite following expansion (though the Government acknowledges that the duration of periods of respite that currently apply will be reduced). Predictability should be afforded to the extent that this is within the airport operator's control.¹⁰⁷ The details of any such scheme, including timings, duration and scheduling, should be defined with engagement with local communities and relevant stakeholders, and take account of any relevant Civil Aviation Authority guidance.
- 5.47 The applicant must put forward as part of their application a ban on scheduled night flights for a period of six and a half hours, based on take-off and landing times, between the hours of 11pm and 7am to be implemented.¹⁰⁸ The rules around its operation, including the exact timings of such a ban and when off-schedule flights can operate during this period, should be defined with engagement with local communities and relevant stakeholders. In addition, outside the hours of a ban, the applicant must make particular efforts to incentivise the use of the quietest aircraft during the nighttime period (11pm - 7am).
- 5.48 It is recognised that Heathrow Airport already supports a number of initiatives to mitigate aircraft noise, such as developing quieter operating procedures (like steeper descent approaches) and keeping landing gear up as long as possible. The applicant must continue to do so and must explore all reasonable opportunities to mitigate operational noise in line with UK best practice. The implementation of such measures may require working with partners to support their delivery. Consideration should be given to the other environmental benefits that mitigations may provide, for example in relation to air quality.
- 5.49 Noise mitigation measures at the construction stage should also be provided. These should draw on best practice from other major construction schemes, with due regard given to any relevant British Standards and other guidance and should be considered during the procurement of contractors. Noise mitigation measures for surface access and ground operation noise impacts should also be provided as below.
- 5.50 Measures to mitigate noise during the construction and operation of the development may include one or more of the following:

- Reducing noise at point of generation and containment of noise generated;

¹⁰⁷ Examples of circumstances outside of an airport operator's control might be severe weather disruption and similar events

¹⁰⁸ 11pm to 7am is the standard night period used in noise measurement, and is used in World Health Organisation guidelines (<https://iris.who.int/server/api/core/bitstreams/f53c45ba-11d3-4502-a424-c1cf49f5a053/content>)

- Where possible, optimising the distance between source and noise-sensitive receptors, and incorporating good design to minimise noise transmission through screening by natural barriers or other buildings; and
- Restricting activities allowed on the site.

5.51 The Secretary of State will expect the applicant to put forward proposals as to how these measures may be secured, monitored, and enforced, including the bodies who may enforce the measures. These bodies might include the Secretary of State, local authorities (including those over a wider area), and / or the Civil Aviation Authority.

5.52 In addition to the above, the applicant is expected to put forward a community compensation package including noise insulation, with further detail set out at paragraph 5.346. These measures should be delivered as soon as reasonably practicable before the operational impact arises.

Decision making

5.53 The Government has been clear that any proposed scheme must meet four clear tests, including that it is consistent with our noise commitments. This includes an applicant giving due regard to national policy on aviation noise¹⁰⁹, the Noise Policy Statement for England¹¹⁰, the relevant sections of the National Planning Policy Framework¹¹¹, and the Government's associated planning guidance on noise.¹¹² However, this NPS must be used as the primary policy on noise when considering the Heathrow Northwest Runway scheme, and has primacy over other wider noise policy sources.

5.54 Any expansion proposal must demonstrate through modelling, that noise impacts can be mitigated where reasonably possible, including for aircraft, and from surface access and ground operations associated with the project, the latter during both construction and operational phases of the project.

5.55 While an increase in noise in some areas is not, in itself, a reason to refuse development consent, to meet the Government's noise test, a promoter must show that:

- The scheme will avoid significant adverse impacts on health and quality of life from noise by limiting, and where reasonably possible, reducing overall aircraft noise compared to 2024¹¹³ taking account of quieter aircraft and operating procedures; and

¹⁰⁹ Including the Government's overarching aviation noise policy statement <https://www.gov.uk/government/publications/aviation-noise-policy-statement/overarching-aviation-noise-policy>

¹¹⁰ Noise policy statement for England, March 2010, <https://www.gov.uk/government/publications/noise-policy-statement-for-england>

¹¹¹ [National Planning Policy Framework](#), or any successor document

¹¹² <https://www.gov.uk/guidance/noise--2>

¹¹³ With reference to the area impacted in the 51 dB LAeq,16h contour for daytime noise and the 45 dB LAeq,8h contour for nighttime noise.

- The scheme will provide adequate, predictable respite for communities including a runway alternation scheme and night flight ban which together with other measures will mitigate and minimise adverse impacts on health and quality of life from noise.

5.56 In determining an application, the Secretary of State should consider whether requirements are needed to ensure that the noise levels from the project do not exceed those described in the assessment or any other estimates on which the decision was based.

Climate change mitigation

Introduction

5.57 The Government is committed to tackling the climate crisis and meeting its legal obligations under the Climate Change Act 2008. Ensuring that Heathrow Airport expansion aligns with legislated carbon budgets and net zero by 2050 is one of the Government's four tests for any proposed scheme.

5.58 In addition, the Planning Act 2008 requires that an NPS must include an explanation of how the policy set out in the statement takes account of Government policy relating to the mitigation of, and adaptation to, climate change.¹¹⁴ The Government has a number of international and domestic obligations to limit greenhouse gas emissions. Emissions from both the construction and operational phases of the project will be relevant to meeting these obligations.

5.59 The 2018 Airports NPS concluded that the Heathrow Northwest Runway scheme could be delivered within the UK's climate change obligations (at that time), based on analysis carried out by the Airports Commission and the Department for Transport, and assuming measures to ensure that the increased emissions from the scheme were not additional overall either at the global or UK level. Since 2018, the UK's climate change obligations have been strengthened, including the 2019 amendment to the Climate Change Act to legislate a net zero target by 2050. Aviation decarbonisation policy has also progressed, including publication of the Jet Zero Strategy, and implementation of policies within it, such as the Sustainable Aviation Fuel (SAF) Mandate. This section has therefore been updated with new analysis and mitigations that are in line with the latest evidence, policy and legislation.

5.60 The Government's key objective on aviation greenhouse gas emissions, as outlined in the previous government's Jet Zero Strategy, is to ensure that the aviation sector plays its part in delivering our legally binding carbon budgets and achieving net zero greenhouse gas emissions by 2050, while creating new jobs, industries and technologies across the entire sector and UK.¹¹⁵ This must be achieved by all parts of the sector working together and with UK

¹¹⁴ Planning Act 2008, section 5(8)

¹¹⁵ <https://assets.publishing.service.gov.uk/media/62e931d48fa8f5033896888a/jet-zero-strategy.pdf>

Government, alongside working with other governments to tackle aviation emissions at a global level through the International Civil Aviation Organization. The development of the Heathrow Northwest Runway scheme being considered under this NPS must comply with this objective.

5.61 The Climate Change Act 2008 provides the UK's legal framework for reducing greenhouse gas emissions. Under the Act, the UK is required to reduce greenhouse gas emissions by at least 100% by 2050. To keep the UK on a pathway to achieving the 2050 target, the Secretary of State for Energy Security and Net Zero is required to set and meet legally binding, five-year caps on greenhouse gas emissions called carbon budgets. Carbon Budgets 1-3 (2008-2022) were met with surplus, while the fourth (2023-2027), fifth (2028-2032), and sixth (2033-2037) have been set and require a ~51%, ~57%, ~76% reduction of greenhouse gas emissions from a 1990 baseline respectively. Carbon Budget 7 is due to be set by 30th June 2026. Under the Paris Agreement, the UK is also required to submit its Nationally Determined Contribution (NDC) to the UN Frameworks Convention on Climate Change (UNFCCC) every five years. To date, the UK has set NDCs to reduce GHG emissions by at least 68% by 2030, and at least 81% by 2035, on 1990 levels. Emissions from international flights are not included in the scope of the UK's two NDCs.

Coverage of aviation emissions under the UK's Climate Change Act 2008

5.62 Greenhouse gas emissions from domestic aviation are within scope of all legislated carbon budgets, and the net zero by 2050 target. Carbon Budgets 1-5 (covering period 2008 – 2032) did not include a UK share of international aviation emissions, instead leaving 'headroom' for an assumed value. In October 2025, the Government confirmed that emissions from the UK's share of international aviation would be included in all carbon budgets from Carbon Budget 6 (2033-37) onwards. Government is already planning on the basis of the inclusion of UK international aviation emissions in future carbon budgets. This has been the position since 2021 when the sixth carbon budget level was set, based on CCC advice, and the Government is currently legislating to formally include these emissions in all post-2032 carbon budgets.

Impacts

5.63 The carbon impact of the proposed development falls into four areas: increased emissions from air transport movements (both international and domestic) as a result of increased demand, emissions from airport buildings and ground operations, emissions from surface transport accessing the expanded airport, and emissions caused by construction. The first is by far the largest of these impacts.

5.64 The Department for Transport has used two core carbon scenarios to assess the impact of Heathrow expansion: one in which policy ambition to reduce emissions and technology development remain in line with current trends, referred to as 'current trends', and another with increased policy ambition to reduce emissions and increased assumptions on technology development, referred to as 'technology development'. A more detailed explanation of these

scenarios and the underlying assumptions can be found in the 2026 aviation forecasts publication.¹¹⁶

- 5.65 The 2026 aviation forecasts publication also shows the overall trajectory of aviation emissions to 2050 and the impact of decarbonisation policies, based on the latest available evidence. This analysis includes updated evidence on the uptake of sustainable aviation fuel (SAF) and efficiency gains, which has resulted in more residual emissions in 2050 and a greater reliance on greenhouse gas removals than in the 2022 Jet Zero Strategy. However, it indicates that net zero aviation by 2050 remains feasible. The Government has committed to reviewing the Jet Zero Strategy in 2027 to set out an updated plan for achieving net zero aviation.
- 5.66 The Government's carbon budget analysis includes all known airport expansion plans (including non-approved expansions). A third runway at Heathrow is therefore included in this analysis, ensuring that plans to deliver currently legislated carbon budgets account for the emissions impacts of planned airport expansion. In addition, the mitigations set out below will ensure that any promoter of Heathrow expansion plays its part in reducing emissions at a national level.
- 5.67 The Government recognises that aviation has both CO₂ emissions and non-CO₂ climate impacts that need to be addressed. Whilst the impact of CO₂ emissions can be quantified, academic research shows that there continues to be significant uncertainty regarding the magnitude of aviation's non-CO₂ impacts on the climate. The Government is currently funding a multi-million-pound research and development programme to better understand and address aviation's non-CO₂ impacts and to identify and develop potential mitigation options. In this context, the applicant is not required to quantify the non-CO₂ impacts of any scheme but should assess these impacts qualitatively, as set out below, and will need to comply with any policy regarding these impacts that is in place at the time of an application.

Applicant's assessment

- 5.68 Pursuant to the terms of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017,¹¹⁷ the applicant should undertake an assessment of the project as part of the Environmental Statement, to include an assessment of any likely significant climate factors (for example the nature and magnitude of greenhouse gas emissions). The applicant should provide evidence of the climate impact of the project (including embodied carbon), both from construction and operation. The applicant should quantify the greenhouse gas impacts before and after mitigation to show the impacts of the proposed mitigation. This will require emissions to be split into traded sector (i.e. emissions within the scope of the UK Emissions Trading Scheme) and non-traded sector emissions, and for a distinction to be made between international and domestic aviation emissions.

¹¹⁶ <https://www.gov.uk/government/publications/uk-aviation-forecast-2026>

¹¹⁷ <https://www.legislation.gov.uk/ukSI/2017/572/contents>

5.69 Greenhouse gas emissions are commonly classified under the Greenhouse Gas Protocol (2001) as Scope 1, Scope 2, and Scope 3. Scope 1 refers to direct emissions from sources owned or controlled by the reporting company, while Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating, or cooling consumed by the company. Scope 3 includes all other indirect emissions across the value chain, excluding Scope 2, and is further divided into upstream emissions - such as those from construction materials, logistics, and supply chain activities - and downstream emissions, which arise from factors like vehicle use, modal shift, induced demand, and lifecycle emissions of infrastructure-enabled activities.

5.70 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 do not adopt this scope-based framework; instead, they address a project's direct and indirect environmental effects. As part of Environmental Statement scoping and assessment, it is therefore necessary to consider whether direct or indirect greenhouse gas emissions as potential effects of the project on climate are likely to arise, i.e. quantifiable emissions with a causal relationship to the project. Where such emissions are identified, and a meaningful assessment is possible, they should be presented as part of the Environmental Statement, with appropriate measures taken to avoid double counting. Flight emissions are an airport's most significant source of scope 3 emissions. Emissions from outbound flights should be used to assess carbon budget impacts in relation to effects on climate. This is consistent with our carbon budgets accounting, where Government currently assumes that only those flights (domestic and international) departing UK airports will be in scope of carbon budgets from 2033. This approach is aligned with international guidelines for national greenhouse gas inventory reporting which seek to avoid double-counting between countries. Although inbound flight emissions can to some extent be quantified and reported, there is no relevant international benchmark to compare these to in order to readily quantify and assess significance for the purposes of environmental statements. Whilst it is acknowledged that other methodologies may over time or certain circumstances be available, it is therefore, as set out below, that emissions from outbound flights only should be used to assess impact against carbon budgets in relation to effects on climate.

5.71 In line with the above, as far as possible, the applicant's assessment should seek to quantify impacts including:

- Emissions from the construction and maintenance activities;
- Emissions from surface access, for example airport passengers and visitors, airport operations, retail, freight, and journeys by airport and construction workers;
- Emissions from airport operations including energy, fuel use and ground handling;
- Well-To-Tank emissions¹¹⁸ for aviation fuel produced in the UK; and

¹¹⁸ Emissions generated during the entire process of producing, processing, and transporting fuel, from extraction to delivery into aircraft

- Emissions from inbound and outbound flights (though only the latter can be compared against carbon budgets in relation to effects on climate).

5.72 A qualitative assessment of non-CO2 impacts¹¹⁹ should also be undertaken.

5.73 This should be undertaken in both a 'do minimum' and 'do something' scenario for the opening, peak operation, and worst-case scenarios. Other impacts such as indirect surface access emissions, or the impact of greenhouse gas emissions from increased employment at an expanded Heathrow airport should be considered, but it is recognised that it may not be possible to quantify these impacts.

5.74 To inform the climate assessment referenced at paragraph 5.68, all proposals for expansion at Heathrow should include a Whole Life Carbon Assessment, conducted according to guidance, standards and methodologies set out in Transport Analysis Guidance Unit A3.¹²⁰ As referenced in this guidance, the guiding principles of managing whole life carbon are established in PAS 2080: Carbon Management in Buildings and Infrastructure (2023). Having regard to current knowledge, a carbon management plan should be produced as part of the DCO submission and include:

- a Whole Life Carbon assessment for the project;
- an explanation of the steps that have been taken to drive down the carbon impacts of the project;
- how construction and operational emissions and, where applicable, emissions from maintenance activities, have been reduced as much as possible using the carbon reduction hierarchy (e.g., as set out in PAS 2080);
- whether and how any residual carbon emissions will be (voluntarily) offset or removed using a recognised framework (any offsetting of emissions should not be included in the Whole Life Carbon Assessment headline figures); and
- where there are residual emissions, the level of emissions including the level of emissions in every legislated carbon budget period i.e. up to carbon budget 7 covering 2038-2042, and five-year periods thereafter until the end of the appraisal period.

Mitigation

5.75 The Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage. The applicant will need to take measures to materially reduce the carbon impact of the project, which may include, but are not limited to the mitigations described in the four categories below.

¹¹⁹ Including contrails, nitrogen oxides (NOx), water vapour, soot (particulates), and sulphur aerosols.

¹²⁰ [TAG unit A3 environmental impact appraisal - GOV.UK](#)

Air travel

5.76 Aircraft are expected to become cleaner as technology and standards improve and fleets evolve. The Government has introduced the Sustainable Aviation Fuel (SAF) Mandate and the Sustainable Aviation Fuel Act 2026 to build demand for SAF and provide revenue certainty for UK SAF producers. The Government is also driving forward delivery of airspace modernisation, which will see cleaner, quicker and quieter journeys, and is providing funding to support the development of low and zero emission aerospace technologies. In addition, cost-effective decarbonisation is being driven through carbon pricing mechanisms, including the UK Emissions Trading Scheme (UK ETS) and the global offsetting scheme CORSIA. It is recognised that Heathrow Airport Limited (as current airport operator) already supports a number of these initiatives to reduce the carbon emissions from flights, including their SAF landing charge incentive and investment into airspace modernisation. It is expected that any promoter of expansion at Heathrow would work with the airport operator to strengthen support for these initiatives.

5.77 Given the challenge of reducing aviation emissions, it is also required that any promoter of expansion will put forward a comprehensive package of mitigation measures, which builds on Heathrow's current decarbonisation commitments. The Secretary of State, when considering any application for development consent, would expect to see evidence and consideration of measures including, but not limited to:

- Significant and sustained investment in engineered greenhouse gas removals, such as Direct Air Carbon Capture and Storage (DACCS) and Bioenergy with Carbon Capture and Storage (BECCS);
- Supporting the production and use of SAF in the UK through offering incentives for SAF use;
- Supporting the uptake of SAF by ensuring sufficient SAF blending and storage facilities;
- Actively engaging with developers of zero emission aircraft and regulatory bodies to ensure the requirements of these aircraft and future infrastructure needs are considered in the planning and design of Heathrow infrastructure;
- Supporting specific projects related to understanding or addressing aviation's non-CO2 impacts and participating in/or convening relevant stakeholder groups to progress action on addressing aviation's non-CO2 impacts; and
- Working with airlines, ground handlers and air traffic control to reduce emissions from flight operations in the landing and take-off cycle. This should include consideration of reduced taxi times, electric taxi and continued work to improve airspace operations around the airport.

5.78 Where possible, investment in the above measures should be in UK-based projects.

Ground movements and airport operations

5.79 All parts of the aviation sector need to play a role in decarbonising the sector - and emissions on the ground need to be reduced as well as in the air. The transition to non-fossil fuel powered airport operations, such as using electric vehicles and zero emission heating and energy systems will also likely result in an improvement in air quality.

5.80 Many airports including Heathrow have signed up to the Airport Council International's (ACI) Airport's Carbon Accreditation scheme, the global framework for managing and reducing airport carbon emissions. Heathrow Airport has already achieved the second highest level of accreditation under this scheme, which requires setting a target for absolute emissions reductions for Scope 1 and 2 emissions. In line with this, Heathrow has committed to reducing these emissions by 45% by 2030 against a 2019 baseline.

5.81 As part of Heathrow Airport's Net Zero Plan, they have also set a goal for all airport vehicles to be zero emissions or use biofuels by 2030 and have a target for all their buildings and infrastructure to be net zero by the mid-2030s.

5.82 The Government is considering what additional actions airports could take to decarbonise their ground operations and expects the scheme promoter to comply with any future guidance. The Secretary of State, when considering any application for development consent, would expect to see evidence and consideration of measures including, but not limited to:

- Plans to achieve Level 5 (Transition) of the ACI's Airport Carbon Accreditation scheme (the highest level);
- Electrifying ground support equipment or transitioning to zero-emission solutions;
- Transitioning to zero emission solutions for all airport vehicles used for the transport and processing of persons, baggage, and cargo between their arrival at the airport and their departure;
- Ensuring there are adequate electric charging facilities for passenger, staff and rental vehicles;
- Replacing energy infrastructure with low-carbon alternatives;
- Replacing heating infrastructure for buildings and other facilities with low carbon alternatives;
- Improving energy efficiency in airport buildings; and
- Procuring renewable electricity.

5.83 The promoter should also ensure there is a resilient, efficient and sustainable grid connection which is fit to support both expanded airport operations and wider requirements, such as surface access interventions and ground-support equipment.

Surface access

5.84 As set out in the Surface access section of this NPS, the Government's objectives for surface access to an expanded Heathrow are making public transport the first choice, minimising the impact on the road network and prioritising environmental sustainability. This section also sets out mitigations that will mitigate the carbon impact of travel to and from the airport including mode share targets, and a requirement for a car parking strategy to encourage mode shift. Additionally, the Government is committed to phasing out the sale of new cars that rely solely on internal combustion engines from 2030 in a sustainable manner, with all new cars and vans being fully zero emission by 2035. In 2024, the first year of the Zero Emission Vehicle (ZEV) Mandate, vehicle manufacturers achieved a compliance rate of 24.3% for the year – exceeding the 22% target. The Government therefore expects surface access emissions to continue to decrease over time, in line with the mandate. In addition to the measures set out in the Surface access section of this NPS, the Secretary of State, when considering any application for development consent, would expect to see evidence and consideration of measures including, but not limited to:

- Changes to the layout of surface access arrangements;
- Encouraging increased use of public transport by staff and passengers;
- Sufficient electric charge point provision for different types of airport users;
- Carbon based parking charges; and
- A strategy for the minimisation of greenhouse gas impacts from road freight.

Construction

5.85 Drawing on the Whole Life Carbon Assessment, carbon hotspots at the construction stage should also be identified and mitigated. Mitigation measures which draw on best practice from other major construction schemes should be identified, with expectations for carbon reduction set out during the procurement of contractors. The Secretary of State, when considering any application for development consent, would expect to see evidence and consideration of measures including, but not limited to:

- Demonstrating alignment with global standards for whole life carbon assessment and management (e.g., PAS 2080 and RICS PS 2023), with accreditation to these standards where applicable;
- Integrating whole life carbon assessment into optioneering and design choices, with clear evidence of applying the carbon reduction hierarchy (i.e. avoid, switch, improve);
- Adopting modern methods of construction (MMC), such as offsite manufacturing to reduce capital carbon and improve quality and programme certainty. Increasing

efficiency in use of construction plant, including the deployment of autonomous and/or low-emission plant where feasible;

- Optimising resource use and reducing waste generation at design stage such as prioritising low-carbon materials, nature-based solutions, lean design principles, and circular economy opportunities;
- Developing construction traffic management plan that prioritises material movements by rail over road transport makes use of consolidation centres and minimises traffic to site. Where road transport is unavoidable, prioritise the use of zero emission vehicles wherever possible and plan logistics to minimise transport distances through local sourcing and optimised routing;
- Connecting construction sites to grid electricity at the earliest opportunity to avoid reliance on mobile generation. Use of energy-efficient site accommodation and welfare facilities and manage temporary energy use to reduce carbon intensity; and
- Embedding carbon key performance indicators and milestone-linked incentives for the supply chain in procurement mechanisms and contracts, such as carbon intensity benchmarks, resource efficiency and waste reduction targets e.g., kgCO₂e/m², % recycled/reused content, % grid electricity vs. diesel generation.

Decision making

5.86 The Secretary of State must be satisfied that the applicant has assessed carbon emissions in line with the applicant's assessment section of this NPS. Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in design, construction and operation should be presented as part of any application for development consent. The Secretary of State will consider if mitigation measures are adequate to ensure that, in relation to design, construction and operation, the applicant has taken all reasonable steps to reduce the total carbon emissions at all stages of development. The Secretary of State's view of the adequacy of the mitigation measures relating to design, construction and operational phases will be a material factor in the decision-making process.

5.87 The Government has been clear that any proposed scheme must meet four tests, including that it aligns with our legal obligations on climate change. The Secretary of State for Energy Security and Net Zero is responsible for assessing on a cross-economy basis whether the UK has sufficient policies and proposals overall to meet the UK carbon budgets, with a view to meeting the net zero target, in line with the duties under sections 13 and 14 of the Climate Change Act 2008. Operational emissions at an expanded Heathrow will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. However, an applicant should still demonstrate that it has sought to minimise and mitigate the impact of expansion at Heathrow as far as reasonably possible, at scheme level.

5.88 Any increase in carbon emissions because of the development alone is not a reason to refuse development consent, however, to meet the Government's climate change test, the increase in carbon emissions resulting from any proposed scheme must not be so significant that it would have a material impact on the UK's legally binding carbon budgets, to be assessed as set out in this paragraph. This assessment should set out the carbon impact of the proposal for all sources of carbon including from construction, surface access, airport operations and air travel. It should set the impact in the context of carbon budgets. For air travel, it should do this by comparing the a) gross (Heathrow only) carbon impact and b) the estimated net system carbon impact (both on a carbon budget accounting basis) against the relevant national carbon budget limit¹²¹. DfT's assessment of the net system impact of Heathrow expansion over different carbon budget periods is included in table 9.2 of the Appraisal of Sustainability¹²². This comparison should be used to estimate the percentage impact on economy-wide carbon budgets from the inclusion of Heathrow expansion impacts.

5.89 When considering this test, it should be noted that aviation emissions are a matter for national-level decision-making, and planning authorities are not required to consider local carbon budgets over national aviation policy. The Secretary of State should also consider what monitoring and enforcement is required to ensure that the residual carbon impacts related to a proposed scheme do not exceed projections.

Economic growth across the country

Introduction

5.90 The Government's longstanding objective is that the construction and operation of a third runway at Heathrow Airport should create economic growth across the country. Analysis carried out by the Department for Transport has shown the scheme has the potential to provide between £29.2 billion to £42.4 billion of cumulative benefits to UK passengers and the wider economy by 2060. External analysis, commissioned by the Department, has found that the scheme could add up to 0.05% to GDP in 2056.¹²³

5.91 This growth would be enabled by enhanced international connectivity, strengthened domestic links and increased trade and investment opportunities. The Government is committed to realising these benefits and ensuring that Heathrow expansion delivers tangible economic growth across the country.

¹²¹ As set out above, only emissions from outbound flights should be used to assess carbon budget impacts.

¹²² <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-appraisal-of-sustainability>

¹²³ <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-appraisal-report>

Applicant's assessment

5.92 The applicant must provide an assessment of the project's economic impacts across the country. This assessment will need to include a breakdown of wider benefits outside of London and the South East of England.

5.93 The assessment should consider all inputs and guidance of relevance, including HMT's Green Book and the Department for Transport's TAG. The Government expect the applicant to utilise whole economy modelling techniques such as Spatial Computable General Equilibrium modelling, in order to account for the displacement of activity and any impacts on other sectors.

5.94 The applicant should demonstrate how the scheme will positively impact on economic growth. Economic growth at the UK level must be associated with supply side effects, although demand side effects may drive the regional distribution of growth. Supply-side effects include:

- Labour supply effects – changes in the overall adult population (e.g. due to migration), labour force participation, unemployment and average hours worked;
- Human capital impacts – changes to the skills composition of the current workforce or new entrants to the workforce, and to the health of the population;
- Investment impacts - changes in UK and foreign firms' investment decisions in the UK capital stock, and the indirect impact of crowding out / crowding in effects; and
- Productivity impacts – including changes in the capacity utilisation of assets, market structures and competition effects, agglomeration, innovation and the diffusion of ideas / intellectual property and movement to more / less productive jobs.

5.95 Consideration should be given to whether the effects are on the level, or on the trend growth rate, of GDP.

5.96 The applicant can utilise alternate analytical approaches, but must provide clear rationale and evidence of the analytical robustness of the approach and data used as part of the application. The applicant's assessment should be used to identify where any mitigations may be required to ensure that the project will contribute to economic growth.

5.97 As part of its application, the applicant should develop an economic growth strategy to demonstrate how it will maximise the opportunities for economic growth at a national, regional and local level during the construction and operational phases of the project, while still ensuring compliance with all other Heathrow Expansion NPS requirements. The economic growth strategy should include, but is not limited to:

- the outcomes of the assessment of the project's economic impacts;
- the opportunities for the supply chain, freight, tourism, employment and skills during the construction and operational phases of the project;

- the protection and enhancement of domestic connectivity; and
- how any adverse impacts will be managed.

Mitigation

5.98 The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse economic impacts of the development or to ensure that opportunities for economic growth resulting from the scheme are available at a national level.

Decision making

5.99 The Government has been clear that any proposed scheme must meet four clear tests, including that it supports the UK's economic growth ambitions. While the Government has set out the strategic and economic case for expansion at the strategic level, an applicant must also demonstrate - through a clear, evidence-based growth strategy - how their specific scheme will support economic activity and growth at national, regional and local levels. This should include credible analysis of expected benefits such as employment creation, productivity improvements, supply-chain opportunities, enhanced connectivity, trade and tourism impacts, and wider contributions to local economies.

5.100 To meet the Government's economic growth test, a promoter must show that the scheme is expected to contribute to economic growth at national, regional and local levels, and that appropriate plans are in place to maximise opportunities and ensure these benefits can be realised in practice.

Surface access

Introduction

5.101 The development covered by this NPS will have a range of impacts on local and national transport networks serving Heathrow airport, during both the construction and operational phases. Passengers, freight operators and airport workers share the routes to and from the airport with other road and rail users, including commuters, leisure travellers and business users. Without effective mitigation, expansion is likely to increase congestion on existing road and public transport modes, which will affect all users, and have environmental impacts such as increased noise and emissions. Therefore, it is important that improvements are made to Heathrow Airport's transport links to support the increased numbers of people and freight traffic that expansion will bring.

5.102 The Government wishes to see the number of journeys made to Heathrow Airport by sustainable modes of transport maximised as much as possible, in a way that minimises congestion and environmental impacts. The conclusions of

the 2015 Airports Commission Final Report stated that an expanded Heathrow would require rail and road improvements to handle the additional demand. To inform the review of this NPS, we have reviewed updated data on passenger and staff movements to the airport, improvements to the transport network around Heathrow since the 2018 Airports NPS was designated, and the latest proposals for phasing of growth in passenger numbers and updated analysis. The Government considers that conclusions from the Airports Commission remain valid and expansion will require public transport and road improvements to handle the additional demand expansion at Heathrow creates, as well as improvements to active travel modes.

Government Objective for Surface Access

5.103 The Government's objectives for surface access to an expanded Heathrow are making public transport the first choice for airport users, minimising the impact on the road network and prioritising environmental sustainability. Further detail can be found in the Surface Access vision (Annex X) which sets out the guiding principles for promoters on what their surface access strategies to support any application should consider.

Applicant's assessment

5.104 The applicant must prepare an airport surface access strategy in conjunction with its Airport Transport Forum, in accordance with the Department for Transport's 'Better Connected: a strategy for integrated transport' and the Surface Access vision. The airport surface access strategy must reflect any phasing over its development, construction and operational stages, reflecting the changing number and type of passengers, freight operators and airport workers attributable to the number of air traffic movements.

Strategy contents

5.105 Any surface access strategy must clearly set out how the applicant will increase the proportion of journeys made to the airport by public transport and active travel. This means that proposals put forward to deliver expansion must prioritise public transport and active travel options for both passengers and staff that are safe, efficient and sustainable. To support this, the applicant should develop plans to deliver active travel, rail, bus and coach connectivity to and from the airport and set out credible plans for funding these. The strategy should reference the role of surface transport in relation to air quality and carbon, setting out a plan to provide appropriate infrastructure to stimulate mode shift to public and active modes, while supporting the needs of zero-emission vehicles across various modes.

5.106 We expect any surface access strategy will explore both the barriers and enablers to mode shift and identify interventions to facilitate both passenger and staff shifting from cars to more sustainable public transport and active modes. The strategy should consider the user journey, including for those with

accessibility requirements, in designing transport interchanges and for travel across the airport site.

5.107 Any strategy should include consideration of the impacts on disabled people and others with specific accessibility requirements, to ensure not only that surface access is accessible to all passengers, including those with a range of visible and less visible impairments, but that the same is true for connectivity between modes and within the airport. Where the application includes changes to surface transport terminals and connecting infrastructure the applicant should follow Government guidance, including Inclusive Mobility, Tactile Paving Guidance, and National Guidance on the Safety and Accessibility of Stopping Places (once published). The applicant should evidence how disabled people have been engaged and how accessibility principles have been embedded in plans from the start. Further details on accessibility requirements are set out in paragraphs 4.105 to 4.109.

5.108 Therefore, any application should set out the package of measures that it considers are required to minimise and mitigate the effect of expansion on existing surface access and demonstrate that any accompanying surface access strategy will support the additional transport demands generated by airport expansion.

Stakeholders

5.109 The applicant should work with relevant stakeholders, including transport bodies and local authorities, to develop these plans and should set out how the actions or policies will be funded and delivered. The strategy should also contain actions, policies and defined performance indicators for delivering against targets, and should include a mechanism whereby the Airport Transport Forum can oversee implementation of the strategy and monitor progress against targets alongside the implementation and operation of the preferred scheme.

5.110 The applicant should also consult with National Highways, Network Rail, in future Great British Railways, Transport for London and relevant highway and transport authorities, and transport operators, to understand the target completion dates of any third party or external schemes included in existing rail, road or other development.

5.111 The applicant should consult National Highways, Network Rail and highway and transport authorities, as appropriate, on the assessment and proposed mitigation measures. The assessment should distinguish between the construction and operational project stages for the development comprised in the application.

Monitoring

5.112 The applicant should commit to annual public reporting on performance against mode share targets for staff and passengers.

Analysis

5.113 The applicant should assess the implications of airport expansion on surface access transport outcomes in order to:

- Demonstrate that their proposals are consistent with achieving or exceeding the surface access targets set out in paragraphs 5.115 and 5.118;
- Provide a vision led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored;
- Demonstrate that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision led approach; and
- Identify, assess and take into account the environmental impacts of traffic and transport infrastructure - including appropriate opportunities for avoiding and mitigating any adverse effects and for net environmental gains.

5.114 Any analysis should be undertaken using the methodologies stipulated in the Department for Transport's Transport Analysis Guidance¹²⁴ where relevant, or any successor to such methodology. Promoters should assess the impact of their proposals on different social groups following the guidance in TAG Unit A4.2 "Distributional Impact Appraisal".

Mitigation

Public Transport Mode Share

5.115 The surface access mode share targets below have been designed to incentivise significant improvements to public transport while mitigating the traffic and environmental impacts associated with additional road trips. The mode share targets are designed to reflect the phased delivery of passenger increases in the scheme and are aligned with defined terminal passenger capacity uplifts associated with the Northwest Runway scheme, which has informed this NPS.

5.116 Any application for development consent and accompanying airport surface access strategy must include details of how the applicant will achieve a passenger public transport mode share of:

- At least 50% when annual terminal passenger capacity is 116m or more;
- At least 55% when annual terminal passenger capacity is 130m or more:

¹²⁴ The Department's Transport Analysis Guidance is updated regularly. This is to allow the evidence used to inform decision-making to be up to date. Where updates are made during the course of preparing analytical work, the updated guidance is only expected to be used where it would be material to the investment decision and in proportion to the scale of the investment and its impacts in line with the TAG proportionate update process.

- For any further capacity increases, the promoter should agree with the Airport Transport Forum and the Secretary of State for Transport on ongoing monitoring and subsequent targets.

5.117 To provide certainty to local communities, a backstop date for achieving mode share targets for passengers should be applied to defined capacity increases. The applicant should propose a backstop date to be defined during the DCO process, and take into account any changes to scheme delivery as required

5.118 Progress against these targets should be measured using data from the CAA's Departing Passenger Survey. The surface access strategy should include arrangements for regular monitoring and review of the mode share target.

Staff

5.119 The application and surface access strategy must also include a staff travel plan including a target for reduction in single occupancy private car travel (in line with proposed capacity increases). The travel plan should set out both how the promoter will achieve the target and how the delivery will be monitored, including the role of the Airport Transport Forum. The Secretary of State should consider attaching appropriate requirements to the DCO to secure these provisions.

5.120 In addition, the applicant should detail how it will minimise landside airport-related traffic throughout construction and operation and should set out plans to manage any additional traffic created, from passengers, staff, freight and ancillary functions, including any enhancements necessary to the local or strategic road network around the airport.

Roads

5.121 The Government recognises that the proposed Heathrow Northwest Runway scheme is likely to have significant impacts on the M25 and the wider strategic and local road network, both during construction and operation. Given the national importance of the M25 as a critical part of the strategic road network, it is essential that these impacts are robustly mitigated and that there is a clear, credible and deliverable plan for how any necessary works can be constructed and operated safely and efficiently. The applicant should work closely with National Highways, and other relevant authorities, to provide assurance that the required interventions can be delivered in a way that maintains the safe and effective operation of the network, minimises disruption to users, and supports the long-term resilience of the road system, including the A4, A3044 and other impacted roads..

5.122 Any changes to the strategic road network which the applicant proposes should be implemented consistently with the Secretary of State's statutory directions and guidance set out in National Highways' licence. This includes ensuring that there is sufficient flexibility to adapt to any future changes to the

long-term development, improvement and operation of National Highways' network, such as Autonomous Vehicles¹²⁵.

- 5.123 For any works impacting on the strategic road network, the applicant should have regard to the Department for Transport's Circular 01/2022, The Strategic Road Network and the delivery of sustainable development (or prevailing policy), and the National Networks National Policy Statement. This sets out the way in which the highway authority for the strategic road network will engage with communities and the development industry to deliver sustainable development and economic growth, whilst safeguarding the primary function and purpose of the network. Where schemes and related surface access proposals or works impact the strategic road network, applicants should provide a mechanism for National Highways to approve further design details, works and access to the strategic road network, so that National Highways can safeguard the primary function and purpose of the network.
- 5.124 Where appropriate, the applicant should seek to deliver improvements or mitigation measures that reduce community severance and improve accessibility, including giving specific consideration to the impacts on non-motorised users. It will be for the applicant to set out a credible funding proposal.
- 5.125 The airport surface access strategy should consider measures and incentives which could help to manage demand by car users travelling to and from the airport, as well as physical infrastructure interventions, having at all times due regard to the effect of its strategy on the surrounding area and transport networks. While car trips including those made by taxis and private-hire vehicles will remain an important means of access to the airport, the applicant should consider mitigations that maximise the efficiency of movements, as well as road access charges and terminal drop-off charges. Any such measures should acknowledge the importance of car travel to users with accessibility requirements and consider exemptions from charges where appropriate.

Parking

- 5.126 The promoter should create a Car Parking Strategy which considers the size, location and charges of airport car parking, including the option to phase their release to encourage mode shift; the promoter should review this strategy on a regular basis.
- 5.127 The proportion of zero-emission vehicles (ZEVs) on the transport network is expected to increase significantly in the coming decades¹²⁶. In alignment with the promoter's approach to environmental sustainability, the promoter should ensure that there is sufficient provision of charging and refuelling infrastructure for ZEVs as their number increases across various vehicle types, including

¹²⁵ <https://www.gov.uk/guidance/automated-vehicles-act-implementation-programme>

¹²⁶ <https://www.gov.uk/government/news/pathway-for-zero-emission-vehicle-transition-by-2035-becomes-law>

buses, coaches, Heavy Goods Vehicles (HGVs) and private cars, and consider how access for ZEVs is encouraged.

Rail and Underground

5.128 Rail and Underground services will play a central role in achieving the public transport mode share targets. A credible surface access strategy must, therefore, demonstrate how rail provision will support a step change in the way passengers and staff access the airport, reducing reliance on car travel and minimising pressure on the surrounding road network.

5.129 The Government considers that enhanced rail connectivity is necessary for supporting expansion at Heathrow and to achieving the public transport mode share targets associated with it. This may include improvements that provide better connectivity from the west and/or south of the airport and enable more direct and convenient journeys for passengers and staff. However, the Government does not consider that all such rail enhancements must necessarily be comprised within the DCO application for the Northwest Runway scheme in order for development consent to be granted. What is required is that the applicant demonstrates clearly in their surface access strategy the rail enhancements they are proposing to deliver and a credible plan for their delivery, how mode share targets will be achieved, how any such enhancements relate to the proposed expansion, its phased delivery and how they would be secured to form part of a wider, credible and deliverable plan for surface access to an expanded Heathrow.

5.130 It is vital that stakeholders, in particular Great British Railways, Network Rail and DFTO are included in any rail scheme development by a promoter, at an early stage, in order to ensure that options are feasible, deliverable and impacts on non-airport journeys are identified and mitigated.

Buses and Coaches

5.131 Bus and coach services do, and will continue to, play a vital role in providing access to Heathrow Airport for passengers, staff and other airport users, including from areas not directly served by rail, and can make a significant contribution to reducing reliance on private car travel and supporting the achievement of public transport mode share targets. Promoters should, therefore, develop bus and coach service improvement plans as part of their surface access strategy. Promoters should work closely with local authorities, transport bodies and operators to ensure that bus and coach interventions complement wider local transport plans, including Bus Service Improvement Plans where relevant. Plans for bus and coach improvements should be developed in line with the Government's vision for buses and approach to delivery¹²⁷.

Freight

¹²⁷ <https://www.gov.uk/government/publications/the-governments-vision-for-buses-and-approach-to-delivery/the-governments-vision-for-buses-and-approach-to-delivery>

- 5.132 In order to deliver the expected benefits for air freight from additional flights at Heathrow, the applicant should demonstrate a plan to increase the airport's cargo capacity that addresses the limitations in cargo handling that exist at the existing site. This should set out the location and size of new cargo handling and processing facilities and the access routes to the road network.
- 5.133 While developing additional freight capacity at Heathrow is critical in delivering the benefits of Heathrow expansion, applicants should set out steps to effectively mitigate against any negative impacts that could arise from increased freight operations, including on road congestion, road safety, noise, air quality and greenhouse gas emissions. This should include sufficient provision for HGV parking and road capacity to avoid the need for prolonged queuing on approach roads and uncontrolled HGV parking on local roads. The applicant should work with National Highways on these plans. The applicant should also make appropriate provision for the use of zero-emission or alternative fuelled vans and HGVs, including charging-points for zero-emission HGVs, ensuring capacity is future-proofed for increased zero-emission vehicle uptake.
- 5.134 The applicant's surface access strategy should set out any proposals for use of rail freight and plans for any necessary infrastructure changes to support this, including consideration and mitigation of impacts on non-airport journeys from additional freight, developed in collaboration with Network Rail and Great British Railways.

Construction

- 5.135 A detailed construction management plan is required to support an application for development consent. The promoter's approach to construction should be designed to avoid, reduce and mitigate adverse effects on the strategic and local road network, existing surface access arrangements, and the safe and efficient operation of Heathrow Airport. The plan should set out how construction traffic, workforce travel, plant, materials, spoil and waste will be managed and phased so as to minimise disruption to passengers, airport workers, freight operators, local communities and other network users. It should include measures to reduce congestion, maintain access, protect road safety and limit impacts on local communities and journeys, including through construction traffic routing, timing of movements, consolidation of deliveries, and the use of rail or other sustainable modes for the transport of materials where feasible. The plan should also set out arrangements for monitoring transport impacts during construction and for implementing corrective action where impacts exceed those anticipated.

Funding

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

promoter should have regard to any updates to the CAA surface access funding policy in developing their strategy. The promoter should also have regard to the Long-Term Rail Strategy strategic objectives, including financial sustainability (reducing costs to Government), which is a requirement in the Railways Bill.

5.137 The Government recognises that any new transport schemes will need to integrate with the wider network and that, alongside stakeholders such as National Highways, Network Rail, Transport for London and local authorities, the promoter will need to engage with the Department for Transport in preparing its surface access strategy. The Department will work with any promoter in developing their proposals, where it interacts with the wider network, including future Great British Railways, to ensure that the strategy is deliverable. This includes proposals that form part of the surface access strategy but are not included in the Northwest Runway DCO application.

Decision making

5.138 The applicant's proposals will give rise to impacts on the existing and surrounding transport infrastructure. The Secretary of State will consider whether the applicant has taken all reasonable steps to mitigate these impacts during both the development and construction phase and the operational phase. Where the proposed mitigation measures are insufficient to effectively offset or reduce the impact on the transport network, arising from expansion, of additional passengers, freight operators and airport workers, the Secretary of State will impose requirements on the applicant to accept obligations to fund infrastructure or implement other measures to mitigate the adverse impacts, including air quality.

5.139 The Secretary of State will expect a promoter's surface access strategy to include arrangements for regular monitoring and review.

5.140 Where monitoring identifies that performance is below the relevant mode share target in any reporting year, the strategy must provide for early corrective action, including the preparation and implementation of measures designed to restore compliance within a reasonable period, working with local stakeholders through the Airport Transport Forum.

5.141 Where under performance persists beyond initial corrective action, the Secretary of State considers it appropriate for the surface access strategy to provide for progressively stronger mitigation measures, reflecting the duration and scale of non-compliance. Such measures may include additional interventions and financial contributions to support sustainable transport provision, secured in advance through the DCO.

5.142 The Secretary of State considers that continued compliance with surface access outcomes is integral to the acceptability of the development. The Secretary of State may consider attaching appropriate requirements and/or obligations to the DCO to secure these provisions.

5.143 In determining whether to grant development consent, the acceptability of the surface access strategy will be an important consideration, as will the degree of confidence that the measures it contains can be delivered, monitored and enforced in practice. The Secretary of State will consider if sufficient evidence has been presented to demonstrate how the surface access strategy will be successfully delivered.

Domestic connectivity

Introduction

5.144 The Government recognises the importance that the nations and regions of the UK attach to domestic connectivity, particularly connections into Heathrow Airport. Airports across the UK provide a vital contribution to the economic wellbeing of the whole of the UK. Without expansion, there is a risk that, as airlines react to limited capacity, they could prioritise routes away from domestic connections. The Government therefore sees expansion at Heathrow Airport as an opportunity to not only protect and strengthen the frequency of existing domestic routes, but to secure new domestic routes to the benefit of passengers and businesses across the UK. To best ensure that this can be achieved the Government expects the applicant to develop a domestic connectivity report, establish a domestic route development fund and discount airport charges for new domestic routes.

Applicant's assessment

5.145 The applicant should develop a domestic connectivity delivery report to demonstrate how it will ensure that Heathrow expansion will maximise opportunities to protect and strengthen existing domestic routes, and to develop new domestic connections, including to regions currently unserved. The report should include an update on how many new domestic routes have been established and are proposed to be established. The applicant should demonstrate that it has worked constructively with stakeholders to develop the delivery report. These stakeholders should include, but are not limited to, regional airports, airlines, Local Authorities, Mayors, Chambers of Commerce, Devolved Governments, Crown Dependencies and the Department for Transport.

5.146 The applicant should publish the report ahead of the release of additional capacity resulting from Heathrow expansion, and then annually for at least three years following the point at which that additional capacity becomes available. The applicant should then decide, in consultation with stakeholders, the appropriate frequency of the report.

5.147 In conjunction with the domestic connectivity delivery report, the applicant should establish a domestic route development fund to support airlines who want to operate new domestic routes at Heathrow Airport that may not initially be commercially viable. We expect the future commercial viability of a route to be taken into account when assessing its suitability to receive support. The

applicant should determine the appropriate size of the fund, but the Government expects it to provide support for at least three years for at least five new domestic routes, from the point at which airlines require support to establish routes ahead of new capacity becoming available.

5.148 How the fund has been established and what it is being used for should be included in the domestic connectivity delivery report. The applicant should consult with stakeholders on the need for the fund beyond three years and publish the conclusions of that consultation in the domestic connectivity delivery report.

5.149 To further support the enhancement of domestic connectivity, the applicant should demonstrate that airport charges for new domestic routes would be discounted in line with existing arrangements. Existing domestic routes already receive discounted airport charges at Heathrow Airport, and the Government expect this to continue for all existing and new domestic routes as far as feasible in line with the requirements of the Airports Charges Regulations 2011 and Heathrow Airport's Economic Licence set by the CAA. Should it be decided that discounted airport charges for domestic routes are no longer needed to protect and strengthen domestic routes, the applicant should provide clear reasoning for this decision in the domestic connectivity delivery report.

Decision Making

5.150 The Secretary of State will consider whether the applicant has set out a credible plan to implement a domestic connectivity delivery report, domestic route development fund and discounted airport charges for domestic routes.

5.151 The Secretary of State will consider if sufficient evidence has been presented to demonstrate how these provisions are secured, and how they will be operated. The Secretary of State may consider attaching appropriate requirements and/or obligations to the DCO to secure these provisions.

Biodiversity and nature conservation

Introduction

5.152 Biodiversity is the variety of life in all its forms and encompasses all species of plants, animals and fungi, the genetic diversity they contain and the complex ecosystems of which they are a part. Geological conservation relates to the sites that are designated for their geology and/or geomorphological importance.¹²⁸

¹²⁸ A list of designated sites is included in the Geological Conservation Review held by the Joint Nature Conservation Committee

- 5.153 The Government's objectives to restore nature, improve environmental quality and security, and make nature easier for everyone to access are set out in its Environmental Improvement Plan.¹²⁹
- 5.154 The wide range of legislative provisions at the international and national level that can impact on planning decisions affecting biodiversity and nature conservation are set out in the National Planning Policy Framework.¹³⁰ The Natural Environment Planning Practice Guidance document sets out good practice in England in relation to planning for biodiversity and geological conservation.¹³¹
- 5.155 Development covered by this NPS may lead to a number of particular impacts on biodiversity that should be considered. For example, this may include a requirement to net open watercourses to manage the risk of bird strike, which may have a detrimental impact on water environment and biodiversity.

Applicant's assessment

- 5.156 The applicant should consider the potential direct and indirect impacts on ecosystems including the impacts on habitats and protected species and the interactions between these, and provide environmental information proportionate to the likely impacts of the infrastructure on biodiversity and nature.
- 5.157 The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests as well as consider how their proposal will deliver biodiversity net gain in line with the requirements in a Biodiversity Gain Statement, as set out in paragraph 4.51 above. This should also take into account relevant published local nature recovery strategies for the area affected by the scheme.¹³² Opportunities should be taken by the applicant to enhance, expand or connect existing habitats and create new habitats in accordance with biodiversity net gain requirements. Habitat creation, enhancement and management proposals should include measures for climate resilience, including appropriate species selection. Maintaining and improving habitat connectivity is important for climate resilience and the biodiversity of ecological networks.

¹²⁹ [Environmental Improvement Plan 2025 - GOV.UK](#) or any successor document

¹³⁰ [National Planning Policy Framework](#) or any successor document

¹³¹ [Natural environment - GOV.UK](#)

¹³² For example the [Local Nature Recovery Strategy for London](#), the [Surrey Local Nature Recovery Strategy](#), and [Berkshire's Local Nature Recovery Strategy](#).

Mitigation

5.158 To avoid direct and indirect harm or disturbance in line with the mitigation hierarchy¹³³ the applicant should demonstrate that:

- the development is designed to avoid the risk of harm, for example by minimising the footprint of the development and/or retaining the site's important habitat features;
- the development is designed and landscaped to provide green corridors and minimise habitat fragmentation (for example using underpasses or green bridges to link habitats);
- during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; and
- during construction and operation, best practice will be followed to ensure that risk of disturbance or damage to species or habitats follows the mitigation hierarchy (including as a consequence of transport access arrangements), for example by planning for construction work to be carried out at specific times to avoid sensitive times and location, such as the breeding season for wild birds and lifecycles of migratory fish.

5.159 If the avoidance of ecological harm is not possible, applicants should include appropriate mitigation measures, in line with the mitigation hierarchy, as an integral part of their proposed development, including identifying where and how these will be secured in the long term.

5.160 If avoidance or bespoke mitigation measures are insufficient or not possible, as a last resort, appropriate compensation measures should be sought and secured.

5.161 Wider ecosystem services and benefits of natural capital should also be considered when designing enhancement measures in order to maximise multifunctional benefits whilst minimising land take. For example, this can be achieved through integration of biodiversity features within a sustainable drainage system; the use of green roofs and walls to harvest rainwater and ameliorate urban heating; or the restoration of rivers to reduce flood risk and provide attractive amenity areas.

5.162 Existing trees and woodlands should be retained wherever possible. Under the Environment Act 2021 the Government set a legally binding target to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The Environmental Improvement Plan recognises the need to protect and increase tree canopy and woodland covers. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation

¹³³ The principle that environmental harm resulting from a development should be avoided (through locating development where there will be less harmful impacts), adequately mitigated, or, as a last resort, compensated for.

may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, suitable compensation schemes will ensure the safe operation of the airport is prioritised, while also securing the long-term management and maintenance of newly planted trees. Where possible, projects should include the reuse of materials and use of sustainable materials such as timber, or recycled materials.

5.163 The Nature Restoration Fund introduced in the Planning and Infrastructure Act 2025 introduces a new way for housing and infrastructure developers to meet their environmental responsibilities where their projects affect protected sites or species. Natural England will, via Environmental Delivery Plans (EDPs) identify and deliver strategic conservation measures that address specific environmental impacts of development on protected sites or species (for instance nutrient neutrality or great crested newts). Where an EDP has been made by the Secretary of State and is applicable / relevant for an infrastructure project, developers can make a payment into the NRF to meet their environmental responsibilities for specific protected features. If intending to rely on one or more EDPs, an applicant will need to engage with Natural England at an early stage, to establish the relevancy for an EDP and the process for requesting / committing to pay the Nature Restoration Levy for that development.

Decision making

5.164 As a general principle, and subject to the specific policies set out below and the Infrastructure Planning (Decisions) Regulations 2010,¹³⁴ development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives.

5.165 The Secretary of State should consider the ten goals of the Government's Environmental Improvement Plan, the United Nations Environmental Programme Convention on Biological Diversity of 1992 and any relevant measures and targets, such as the Environment Act 2021 targets.

5.166 In doing so, the Secretary of State should also take account of the context of the challenge of climate change: failure to address this challenge will result in significant adverse impacts to biodiversity.

5.167 The Secretary of State should consider what appropriate requirements should be attached to any consent, contained in any planning obligations entered into, to ensure that any necessary mitigation and compensatory measures are secured, delivered, managed and if necessary enforced, and that biodiversity improvements where appropriate are registered in accordance with biodiversity net gain requirements.

¹³⁴ <http://www.legislation.gov.uk/uksi/2010/305/regulation/7/made>

- 5.168 As a general principle, and subject to the specific policies below, development should, at first avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives. If avoidance is not possible, mitigation needs to be considered (as set out in paragraphs 5.158 to 5.163 above). Where significant harm cannot be avoided or mitigated it should be compensated for as a last resort, with on-site mitigation being considered prior to off-site, for mitigation other than biodiversity net gain. The Secretary of State will give significant weight to any residual harm.
- 5.169 In making a decision on whether to grant a DCO, the Secretary of State will ensure that appropriate weight is attached to: designated sites of international, national and local importance; irreplaceable habitats¹³⁵; protected species and habitats; other species of principal importance for the conservation of biodiversity; biodiversity and geological interests within the wider environment; and to areas prioritised for nature's recovery in the relevant local nature recovery strategies.
- 5.170 The Secretary of State will need to take account of the advice provided to the applicant by relevant stakeholders such as Natural England, the Environment Agency or local planning authority as regards any necessary mitigation measures and whether these organisations have granted or refused, or intend to grant or refuse, any relevant licences or permit, including protected species mitigation licences. In advance of the formal submission, applicants are encouraged to use Natural England's Letter of No Impediment approach for species licensing and engage with Natural England accordingly.

Internationally important nature sites

- 5.171 The most important sites for biodiversity are those afforded special protection by the Habitats Regulations. These sites are designated as Special Areas of Conservation, Special Protection Areas and Listed or proposed Wetlands of International Importance (Ramsar sites); and are collectively known as habitats sites. The following sites should be given the same protection as sites legally protected by the Habitats Regulations:
- Potential Special Protection Areas and possible Special Areas of Conservation; and
 - Sites identified or required as compensatory measures for adverse effects on habitats sites.
- 5.172 The Habitats Regulations set out a specific process (see paragraphs 4.44 to 4.46) to assess the likely implications for these sites from a proposed plan or project. To maintain the overall coherence of the National Site Network, such plans or projects may only proceed if the assessment concludes they will not adversely affect the integrity of the site or, in the case of a negative assessment, if there are no alternative solutions, and they must proceed for

¹³⁵ Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh, lowland fen.

imperative reasons of overriding public interest with the necessary compensatory measures secured.

5.173 At this stage, it is not possible to rule out adverse effects from the Heathrow Northwest Runway scheme, given that more detailed project design information, and detailed proposals for mitigation, are not presently available. However, the applicant will need to demonstrate that the Habitats Regulations are complied with in order to satisfy the competent authority that development consent can be granted on that basis.

Nationally important sites: Sites of Special Scientific Interest

5.174 Many Sites of Special Scientific Interest are also designated as habitats sites and are protected accordingly. Those that are not, or those features of Sites of Special Scientific Interest that are not covered by an international designation, are given a high degree of protection by the Wildlife and Countryside Act 1981. Most of the land that has been declared by Natural England as National Nature Reserves is also notified as Sites of Special Scientific Interest.

5.175 Where a proposed development on land within or outside a Site of Special Scientific Interest is likely to have an adverse effect on the site (either individually or in combination with other developments), development consent should not normally be granted. An exception should be made only where the benefits of the proposed development at this site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.

5.176 The Secretary of State will ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable. Where necessary, requirements and/or planning obligations should be used to ensure these proposals are delivered. The Secretary of State is bound by the duty placed on all public bodies in section 28G of the Wildlife and Countryside Act 1981 to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a site is of special scientific interest.

Regional and local sites

5.177 Sites of regional and local biodiversity and geological interest (which include Local Geological Sites, Local Nature Reserves, Local Wildlife Sites and Nature Improvement Areas) are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide benefits including contributing to the quality of life and the wellbeing of the community, and in supporting research and education.

5.178 The Secretary of State will give due consideration to any harm to the detriment of biodiversity and geological features of regional or local importance which the Secretary of State considers may result from proposed

development. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent, although the mitigation hierarchy applies to these sites.

Irreplaceable habitats including ancient woodland, and ancient and veteran trees

5.179 Ancient woodland and ancient and veteran trees are irreplaceable habitats. England's ancient woodland and ancient and veteran trees support high levels of biodiversity. The Keepers of Time¹³⁶ published under the previous government sets out the Government's policy to recognise the value of England's ancient and native woodlands and ancient and veteran trees. It states the Government's commitment to evaluate the threats facing these habitats and sets out updated principles and objectives to protect and improve these habitats for future generations.

5.180 The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland, and ancient and veteran trees, unless there are wholly exceptional reasons (for example where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided¹³⁷. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.

Biodiversity within and around developments

5.181 The proposed development comprised in the Northwest Runway scheme should provide many opportunities for incorporating beneficial biodiversity or geological features as part of good design. Nature contributes to the quality of a place, to people's quality of life, the attractiveness of active travel routes and movements, and it is a critical component of well-designed development. Development covered by this NPS can also play a part in meeting Government tree planting and nature recovery targets through partnership working with adjoining landowners, delivering biodiversity, carbon offsetting and social benefits.

5.182 When considering proposals, the Secretary of State will consider whether the applicant has maximised such opportunities and enhancement of wider biodiversity in and around development, and particularly to establishing and enhancing green infrastructure. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered and ongoing management and maintenance is secured.

¹³⁶ Keepers of time: ancient and native woodland and trees policy in England

¹³⁷ This does not prevent the loss of such trees where the decision maker is satisfied that their loss is unavoidable

Habitats and Species of Principal Importance

5.183 Many individual wildlife species receive statutory protection under a range of legislative provisions¹³⁸. Some species and habitats have been identified as being of principal importance for the conservation of biodiversity in England¹³⁹ and therefore requiring conservation action. As a public authority, the Secretary of State is bound by the duty in section 40 of the Natural Environment and Rural Communities Act 2006 (as amended by section 102 of the Environment Act 2021) to periodically consider what action the authority can take, consistent with the exercise of its functions, to further the conservation and enhancement of biodiversity. In doing so the Secretary of State may consider the impact on species or habitats listed under Section 41 of the Act. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions. The Secretary of State should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits of the development (including need) clearly outweigh that harm.

Land use including open space, green infrastructure and Green Belt

Introduction

5.184 Development covered by this NPS will have a direct effect on the existing use of the proposed site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development. There may be particular effects on open space¹⁴⁰ including green and blue infrastructure¹⁴¹. Access to high quality open spaces and the countryside and opportunities for sport and recreation can be a means of providing necessary mitigation and/or compensation requirements. Green infrastructure can enable developments to provide positive environmental and economic benefits.

5.185 Green Belts defined in a development plan¹⁴², are situated around certain cities and built up areas, including London. The fundamental aim of Green Belt

¹³⁸ Certain plant and animal species, including all wild birds, are protected under the Wildlife and Countryside Act 1981. European plant and animal species are protected under the Conservation of Habitats and Species Regulations 2010 (as amended). Some other animals are protected under their own legislation, for example Protection of Badgers Act 1992.

¹³⁹ Lists of habitats and species of principal importance for the conservation of biological diversity in England published in response to Section 41 of the Natural Environment and Rural Communities Act 2006 are available from the Biodiversity Action Reporting System website.

¹⁴⁰ Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. However, in applying the policies in this section, open space should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity.

¹⁴¹ Green and blue infrastructure is a network of multi-functional green and blue spaces and other natural features, both rural and urban, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity

¹⁴² Or else so designated under the Green Belt (London and Home Counties) Act 1938

policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Further information on the purposes and protection of Green Belt is set out in the National Planning Policy Framework or any successor document.

- 5.186 Although the re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, it may not be possible for some forms of infrastructure.
- 5.187 Development of land can affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process. During the development lifecycle, soil should be sustainably managed and handled appropriately, reusing soil to keep it on site where possible, and reducing the amount sent to landfill. Any land affected by contamination will need to be remediated appropriately.
- 5.188 Construction and operation of airport facilities is a potential source of contaminative substances (for example, through de-icing or leaks and spills of fuel). Where pre-existing land contamination is being considered through development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum¹⁴³.

Applicant's assessment

- 5.189 The Environmental Statement should identify existing and proposed land uses¹⁴⁴ near the project, including any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. The applicant should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the scheme and its likely impacts on such receptors.
- 5.190 When considering proposals for green infrastructure and recreational land, the applicant should refer to the National Planning Policy Framework and Green Infrastructure Framework¹⁴⁵ or any successor documents.
- 5.191 The applicant should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements.

¹⁴³ <https://www.gov.uk/government/publications/contaminated-land-statutory-guidance>

¹⁴⁴ for example, where a planning application has been submitted

¹⁴⁵ See <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

- 5.192 During any pre-application discussions with the applicant, the local planning authority should identify any concerns it has about the impact of the application on land use, having regard to the development plan and relevant applications and including, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements. These are also matters that local authorities may wish to include in their Local Impact Report which can be submitted after an application for development consent has been accepted.
- 5.193 The applicant should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).
- 5.194 The applicant should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination. In doing so, the applicant should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed. The applicant is encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination.¹⁴⁶
- 5.195 For developments on previously developed land, the applicant should ensure that they have considered the risk posed by land contamination, and where contamination is present, the applicant should consider opportunities for remediation where possible. It is important to do this as early as possible as part of engagement with the relevant bodies before the official pre-application stage¹⁴⁷.
- 5.196 The applicant should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.
- 5.197 The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. The applicant should therefore determine whether the proposal, or any part of it, is within an established Green Belt and, if so, whether its proposal may be considered inappropriate development within the meaning of Green Belt policy. The applicant should also ensure that it has taken into account protections relating to Metropolitan Open Land and land designated a Local Green Space in a local or neighbourhood plan.

¹⁴⁶ For guidance, see the Defra Code of practice for the sustainable use of soils on construction sites.

¹⁴⁷ See <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

5.198 Where land is remediated it should, as a minimum, not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. The applicant should have regard to statutory regimes and relevant Government policy and guidance such as the National Planning Policy Framework and Planning Practice guidance.¹⁴⁸

Mitigation

5.199 The applicant can minimise the direct effects of a project on the existing use of the proposed site, or proposed uses near the site, by the application of good design principles, including the layout of the project and the protection of soils during construction.¹⁴⁹

5.200 Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to National Trails and other public rights of way.

5.201 The Secretary of State should also consider whether any adverse effects on green infrastructure or open space are adequately mitigated or compensated by means of any planning obligations, for example to provide exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where sections 131 and 132 of the Planning Act 2008 apply¹⁵⁰, any replacement land provided under those sections will need to conform to the requirements of those sections.

5.202 Where the scheme has an impact on a mineral safeguarding area, the Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to safeguard mineral resources.

5.203 Where a project has a sterilising effect on land use, there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors. The applicant should take account of Local Nature Recovery Strategies in order to maximise opportunities for nature recovery.

5.204 Public rights of way, National Trails and other rights of access to land are important recreational facilities, for example for walkers, cyclists and horse riders. The applicant is expected to take appropriate mitigation measures to address adverse effects on National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may

¹⁴⁹ <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>

¹⁵⁰ <http://www.legislation.gov.uk/ukpga/2008/29/section/131> and <http://www.legislation.gov.uk/ukpga/2008/29/section/132>

be to improve or create new access. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or other provisions in respect of these measures might be attached to any grant of development consent.

Decision making

- 5.205 The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements, or the Secretary of State determines that the benefits of the project (including need), outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.
- 5.206 Where networks of green infrastructure have been identified in development plans, they should normally be protected from development and, where possible, strengthened by or integrated within it. The Secretary of State should take account of Local Nature Recovery Strategies in identifying areas with need for protection. The Secretary of State will also have regard to the effect of the development upon and resulting from existing land contamination, as well as the mitigation proposed.
- 5.207 The Secretary of State should ensure that the applicant does not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the National Planning Policy Framework. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The Secretary of State should also ensure the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.
- 5.208 When located in the Green Belt, projects may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt, and the Secretary of State will need to assess whether any new building on Green Belt land should be permitted in line with the very special circumstances outlined in the National Planning Policy Framework or any successor document.
- 5.209 Very special circumstances are not defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. However, when considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt.

5.210 In England, Local Green Spaces may be designated locally in Local Plans and Neighbourhood Plans. These enjoy the same protection as Green Belt in England and the Secretary of State should adopt a similar approach.

Home Office assets

Introduction

5.211 There are two Immigration Removal Centres (IRCs) to the north-west of Heathrow Airport (Harmondsworth IRC and the Colnbrook IRC). The IRCs also have the following connected assets associated with them: escorting vehicle base, Border Force dog kennels and custody suite, and the HM Courts and Tribunals Service facility. These are run as one facility. IRCs play a vital role as part of the infrastructure which allows the Government to maintain effective immigration control and secure the UK's borders.

5.212 Continuous service provision of the UK's immigration detention capabilities at Heathrow is essential. This consideration extends to the need to provide appropriate road access to the IRC(s). Current IRCs will only be vacated once agreed acceptance criteria are met and mobilisation of replacement IRC(s) is complete.

Assessment

5.213 Applicants will need to show how they have considered the impacts of the project upon the existing IRCs. This should include addressing the impact of the scheme on the IRCs, including the means by which the impacts will be addressed, and how this would be phased.

5.214 IRC proposals must be developed in collaboration with, and to the satisfaction of, the Home Office. Applicants must demonstrate, within their proposals, how they meet Home Office criteria to replace the existing IRCs and the associated assets. During the development of the replacement IRCs, applicants are required to engage constructively with the Government and to be subject to proportionate and ongoing scrutiny to ensure that the relevant requirements continue to be met.

5.215 The location of the replacement IRCs shall be subject to the explicit agreement of the Home Office. The applicant must also set out how a replacement IRC would function in relation to neighbouring land uses, as well as how it can best be accommodated without adversely affecting such uses. Local authorities may address this in their local impact report, which can be submitted after an application for development consent has been put forward by a promoter.

Decision making

5.216 The Secretary of State considers that replacement facilities in substitution for the affected IRCs, must be provided prior to any works which may significantly interfere with the service and facilities provided by the existing IRCs. The Secretary of State will consider whether the applicant has taken all reasonable steps to ensure continuity of services for the existing IRCs, and their connected assets. Where necessary, the Secretary of State will impose requirements or obligations upon the applicant to deliver suitable replacement facilities.

5.217 If the applicant commits to providing appropriate facilities on a continuous basis, with constant road access, in line with Home Office design and governance requirements, and to the Home Office's satisfaction, development consent should not be withheld on the grounds of the project's effects on the existing IRCs.

Resource and waste management

Introduction

5.218 Government policy on hazardous and non-hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible, waste management regulation ensures that waste is disposed of in a way that is least damaging to the environment and to human health.

5.219 Sustainable waste management is implemented through the waste hierarchy:

- Waste prevention;
- Preparing for reuse;
- Recycling;
- Other recovery, including energy recovery; and
- Disposal.

5.220 The targets for preparation for re-use and recycling of municipal waste and for the amount of municipal waste landfilled set out by The Waste (England and Wales) Regulations 2011 and the residual waste reduction target set out in the Environmental Targets (Residual Waste) (England) Regulations 2023 should be considered 'minimum acceptable practice' for the construction and operation of any Development covered by this NPS. Exceeding these targets, if possible, by aiming for exemplar performance in resource efficiency and waste management is recommended, to align with the Government's circular economy objectives.

5.221 Development covered by this NPS may generate hazardous and non-hazardous waste during construction and operation. The Environment Agency's environmental permitting regime incorporates operational waste management controls for certain activities. When the applicant applies to the Environment Agency for an environmental permit, the Environment Agency will require the application to demonstrate that processes are in place to meet all relevant conditions.

5.222 In addition, the Heathrow Northwest Runway scheme would involve the removal of the Lakeside Energy from Waste plant.

5.223 Waste generated and sent to landfill during construction and operation will be an ongoing management issue, and will continue to have adverse effects on the environment into and beyond the operational phase. The principal adverse effects of sending waste to landfill include:

- Permanent loss of materials from potential use higher up the waste management hierarchy;
- Reduction of local and regional landfill capacity;
- Visual, noise, health and other nuisance impacts on local communities;
- Environmental degradation and pollution;
- Greenhouse gas emissions; and
- Environmental implications of transporting waste to landfill sites.

Applicant's assessment

5.224 The applicant should set out the arrangements that are proposed for managing any waste produced in the application for development consent. The arrangements described should include information on the proposed waste recovery and disposal system for all waste generated by the development. The applicant should seek to minimise the volume of waste sent for disposal unless it can be demonstrated that the alternative is the best overall environmental, social and economic outcome when considered over the whole lifetime of the project.

5.225 The applicant must consider opportunities for material efficiency, waste prevention and circularity and how to ensure that its proposal aligns with the Government's circular economy ambitions. The applicant must also consider the impact of expansion on the airport's ability to deal with international catering waste, which is classed as a high risk, category 1 animal by-product.

5.226 The effects of removing the Lakeside Energy from Waste plant upon capacity for treatment of waste will require assessment.

Mitigation

5.227 The applicant should set out a comprehensive suite of mitigations to eliminate or significantly reduce the risk of adverse impacts associated with resource and waste management.

5.228 The Government recognises the role of the Lakeside Energy from Waste plant in local waste management plans. The applicant should make reasonable endeavors to secure provision of alternative waste treatment capacity broadly equivalent to that which is currently provided by the Lakeside Energy from Waste plant.

Decision making

5.229 The Secretary of State should consider the extent to which the applicant has proposed an effective process that will be followed to ensure effective management of hazardous and non-hazardous waste arising from all stages of the lifetime of the development. The Secretary of State should be satisfied that the process set out provides assurance that:

- Waste produced will be properly managed, both onsite and offsite;
- The waste from the proposed development can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arising should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arising in the area; and
- Adequate steps have been taken to ensure that all waste arising from the site is subject to the principles of the waste hierarchy¹⁹⁰, are dealt with at the highest possible level within the hierarchy and consideration has been given to the circular economy.

5.230 Where necessary, the Secretary of State will require the applicant to develop a resource management plan to ensure that appropriate measures for sustainable resource and waste management are secured.

Flood risk

Introduction

5.231 Climate change over future decades is likely to result in milder, wetter winters and hotter, drier summers in the UK, while sea levels will continue to rise. Within the lifetime of the proposed development, these factors will lead to increased flood risk in areas susceptible to flooding, and to an increased risk of flooding in some areas not currently thought of as being at risk. In addition to increasing flood risk, longer term climate change will result in changes to

weather-related disruption, most often caused by wind, rain, snow and ice. The applicant, the Examining Authority and the Secretary of State in taking decisions should take account of the policy on climate change adaptation as set out in the National Planning Policy Framework¹⁵¹ and other supporting guidance.¹⁵²

5.232 Heathrow Airport is located within the Colne catchment which comprises the River Colne, multiple tributaries, artificial channels and former gravel extraction waterbodies. A Northwest Runway scheme has potential to affect flood risk including through river diversion and changes to drainage patterns. This section should therefore be considered in this context.

5.233 The National Planning Policy Framework sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, it should be made safe for its lifetime without increasing flood risk elsewhere¹⁵³. Planning practice guidance¹⁵⁴ explains that essential transport infrastructure (including mass evacuation routes) which must cross the area at risk has a vulnerability classification of 'Essential Infrastructure'. Table 2 of the planning practice guidance on flood risk and coastal change sets out that Essential Infrastructure is potentially permissible in areas of high flood risk, subject to the requirements of the Exception Test. In addition, as set out in the National Planning Policy Framework, new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change.¹⁵⁵

5.234 Loss of flood plain storage may increase the overall flood risk for the catchment. The extent of any impact will depend on the ability of the development to manage storage of water on or off-site.

5.235 Where this NPS mentions the UK Climate Change Risk Assessment¹⁵⁶, the reader should refer to the most recent version of the document.

5.236 The Environment Agency's National Flood and Coastal Erosion Risk Management Strategy for England¹⁵⁷ provides a framework for guiding the operational activities and decision making of practitioners.

Applicant's assessment

5.237 Applications for projects in the following locations should be accompanied by a flood risk assessment:

¹⁵¹ [National Planning Policy Framework](#) or any successor document

¹⁵² <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

¹⁵³ [National Planning Policy Framework](#) or any successor document

¹⁵⁴ <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

¹⁵⁵ [National Planning Policy Framework](#) or any successor document

¹⁵⁶ UK Climate Change Risk Assessment

¹⁵⁷ [National Flood and Coastal Erosion Risk Management Strategy for England - GOV.UK](#)

- Flood Zones 2 and 3 (medium and high probability of river and sea flooding); or
- Flood Zone 1 (low probability of river and sea flooding) for projects involving: sites of 1 hectare or more; land identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

5.238 The flood risk assessment should identify and assess the risks of all forms of flooding to and from a scheme, and demonstrate how these flood risks will be managed, taking climate change into account¹⁵⁸.

5.239 In preparing a flood risk assessment the applicant should:

- Consider the risk of all sources of flooding arising from the development that comprises a scheme, in addition to the risk of flooding to the project, and demonstrate how these risks will be managed and, where relevant, mitigated, so that the development remains safe throughout its lifetime¹⁵⁹;
- Take into account the impacts of climate change, clearly stating the development lifetime over which the assessment has been made;
- Consider the vulnerability of those using the infrastructure including arrangements for safe access and exit arrangements;
- Include the assessment of residual risk after risk reduction measures have been taken into account, and demonstrate that these risks can be safely managed;
- Consider if there is a need to remain operational during a worst case flood event over a scheme's lifetime taking account of the status of Heathrow Airport as critical national infrastructure; and
- Provide the rationale for the Secretary of State to apply the Sequential Test and Exception Test¹⁶⁰, as appropriate.

5.240 Where a scheme may be affected by, or may add to, flood risk, the applicant is advised to seek early pre-application discussions with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers, highways authorities and reservoir owners and operators. These discussions can be used to identify the likelihood and possible extent and nature of the flood risk, help scope the flood risk assessment, and identify the information that may be required by the Secretary of State to reach a decision on the application. If the Environment Agency has concerns about proposals on flood risk grounds, the applicant is encouraged to discuss these concerns at an early stage with the Environment Agency and look to agree ways in which the proposal might be amended, or additional information provided, which would

¹⁵⁸ <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

¹⁵⁹ Updated flood maps are available on the Environment Agency's Flood Map for Planning Service

¹⁶⁰ [National Planning Policy Framework](#) or any successor document

satisfy the Environment Agency's concerns, before the application for development consent is submitted.

5.241 For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in a flood risk assessment. Surface water flood issues need to be understood to allow them to be taken into account, for example by clearly identifying and managing flow routes.

5.242 When assessing the potential impacts of climate change on airports which can be wider than flooding impacts, such as implications from heat and water availability and the potential adaptation strategies for them, the applicant should take into account the latest UK Climate Change Risk Assessment, the latest set of UK Climate Projections, and other relevant sources of climate change evidence. The applicant should also ensure any Environmental Statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure

Mitigation

5.243 The applicant should ensure that a scheme design takes into account flood risk and should put forward measures to mitigate the impact of flooding.

5.244 Mitigation measures will need to be developed as part of the applicant's application for development consent to ensure that it is safe from flooding, and will not increase flood risk elsewhere for the proposed development's lifetime, taking into account climate change.

5.245 To satisfactorily manage flood risk and the impact of the natural water cycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of Sustainable Drainage Systems but could also include vegetation to help to slow runoff, hold back peak flows, and make landscapes more able to absorb the impact of severe weather events.

5.246 In this NPS, the term Sustainable Drainage Systems is used and taken to cover the whole range of sustainable approaches to surface water drainage management including:

- Source control measures including rainwater recycling and drainage;
- Use of Sustainable Drainage Systems Management Trains to improve water quality;
- Infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities;
- Filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns;

- Filter drains and porous pavements to allow rainwater and runoff to infiltrate into permeable material below ground and provide storage if needed;
- Basins and ponds to hold excess water after rain and allow controlled discharge that avoids flooding; and
- Flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding.

5.247 Site layout and surface water drainage systems should be able to cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.

5.248 The surface water drainage arrangements for the Northwest Runway scheme should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, taking into account climate change, unless specific off-site arrangements are made and result in the same net effect.

5.249 If there are no viable Sustainable Drainage Systems options available, it may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the main application site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation or a DCO requirement.

5.250 The sequential approach should be applied, where appropriate, to the layout and design of the project. Vulnerable uses should be located on parts of the site at lower probability and residual risk of flooding. The applicant should seek opportunities where appropriate to use open space for multiple purposes such as amenity, wildlife habitat, and flood storage uses. Opportunities can be taken to lower flood risk by improving flow routes, flood storage capacity and using Sustainable Drainage Systems.

Decision making

5.251 Where flood risk is a factor in determining an application for development consent, the Secretary of State will need to be satisfied that, where relevant:

- The application is supported by an appropriate flood risk assessment; and
- The Sequential Test¹⁶¹ has been applied as part of site selection and, if required, the Exception Test¹⁶²

5.252 The Secretary of State should not consent development in flood risk areas (including flood zones 2 and 3 and locations at risk of flooding from local

¹⁶¹ [National Planning Policy Framework](#) or any successor document

¹⁶² [National Planning Policy Framework](#) or any successor document

watercourses, surface water, groundwater or reservoirs) accounting for the predicted impacts of climate change unless satisfied that the sequential test requirements have been met. In addition, the Secretary of State should not consent development in Flood Zone 3 unless satisfied that both the Sequential and Exception Test requirements have been met.

5.253 When determining an application, the Secretary of State will need to be satisfied that flood risk will not be increased elsewhere, and will only consider development appropriate in areas at risk of flooding where, informed by a flood risk assessment, following the Sequential Test and, if required, the Exception Test, it can be demonstrated that:

- Within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and
- Over its lifetime, development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning, and that priority is given to the use of sustainable drainage systems.

5.254 In addition, any project that is classified as 'essential infrastructure' and proposed to be located in Flood Zone 3a or b should be designed and constructed to remain operational and safe for users in times of flood; and any project in Flood Zone 3b should result in no net loss of floodplain storage and not impede water flows.

5.255 When determining an application, the Secretary of State will need to be satisfied that the potential effects of climate change on the development have been considered as part of the design. Should a new set of UK Climate Projections become available after the preparation of an Environmental Statement, the Examining Authority or the Secretary of State will consider whether they need to request additional information from the applicant as part of the development consent application.

5.256 For construction work which has drainage implications, approval for the scheme's overall approach to drainage systems will form part of any development consent issued by the Secretary of State¹⁶³. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards issued by the Government.¹⁶⁴ In addition, the DCO, or any associated planning obligations, will need to make provision for the adoption and maintenance of any Sustainable Drainage Systems, including any necessary access rights to property.

5.257 The Secretary of State will need to be satisfied that the most appropriate body would be given the responsibility for maintaining any Sustainable Drainage Systems, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for

¹⁶³ Drainage implications as defined in Paragraph 7(2) of Schedule 3 to the Flood and Water Management Act 2010 <http://www.legislation.gov.uk/ukpga/2010/29/schedule/3/crossheading/requirement-for-approval>

¹⁶⁴ The National Standards set out requirements for the design, construction, operation and maintenance of sustainable drainage systems, and may include guidance to which the Secretary of State will have regard.

example, the applicant, the landowner, the relevant local authority, or another body such as the Internal Drainage Board or sewerage undertaker. Where infiltration type Sustainable Drainage Systems are proposed, preapplication discussions with the Environment Agency are recommended to ensure they do not cause pollution to surface and groundwater quality and applicants should consider the role of Sustainable Drainage Systems management trains to control and treat run-off.

5.258 If the Environment Agency continues to have concerns, and therefore objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied that all reasonable steps have been taken by the applicant and the Environment Agency to attempt to resolve the concerns. Similarly, if the lead local flood authority objects to the development consent on the grounds of surface or other local sources of flooding, the Secretary of State can grant consent, but would need to be satisfied that all reasonable steps have been taken by the applicant and the lead local flood authority to attempt to resolve the concerns.

Water quality and resources

Introduction

5.259 Airport infrastructure schemes can have adverse effects on the water environment, including groundwater, inland surface water and transitional waters.¹⁶⁵ During construction and operation, they can lead to increased demand for water, involve discharges to water, and cause adverse ecological effects resulting from physical modifications to the water environment. There may also be an increased risk of spills and leaks of pollutants to the water environment. These effects could lead to adverse impacts on health or on protected and other species and habitats, and could, in particular, result in surface waters, groundwaters or protected areas¹⁶⁶ failing to meet environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 WFD Regulations).

5.260 Heathrow Airport is located within the Colne catchment, a highly modified hydrological system comprising the River Colne, multiple tributaries, artificial channels and former gravel extraction waterbodies. A Heathrow Northwest Runway scheme could involve the diversion, realignment and temporary

¹⁶⁵ As defined in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, Schedule 1: "groundwater" means all water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil; "surface water" means inland waters (except groundwater) transitional waters and coastal waters except in respect of chemical status for which it shall also include territorial waters; and "transitional waters" means bodies of surface water in the vicinity of river mouths which are partly saline in character as a result of their proximity to coastal waters by which are substantially influenced by freshwater flows.

¹⁶⁶ Protected areas means an area included on a register in accordance with Water Environment (Water Framework Directive) (England and Wales) regulation 10.

reconfiguration of multiple watercourses within the Colne catchment, including the River Colne, Wraysbury River, Longford River and Duke of Northumberland's River. This section should therefore be considered in this context.

5.261 The planning system should contribute to and enhance the natural and local environment. This includes, among other things, preventing new and existing development from i) contributing to, ii) being put at unacceptable risk from, or iii) being adversely affected by unacceptable levels of water pollution. The Government provides planning practice guidance on water supply, wastewater and water quality considerations in the planning system.¹⁶⁷ An application for a Northwest Runway scheme should have regard to the objectives of the Thames River Basin District Management Plan (RBMP) and avoid or mitigate deterioration of water bodies in the area.

5.262 Airport development could impact the water environment, especially the quality of the surface and groundwater. This includes through the discharge of waters contaminated with de-icer, hydrocarbons and other pollutants in particular including per and poly-fluoroalkyl substances (PFAS) which can be used in firefighting foams. The Government's PFAS plan sets out a long-term vision to reduce and minimise the impacts of harmful PFAS including through the transition to safer alternatives.¹⁶⁸ This includes considering the restriction of their use in firefighting foams.¹⁶⁹ The applicant should ensure that it takes into account the Government's PFAS plan and any legislative changes in this respect that affect its planned operations.

Applicant's assessment

5.263 The applicant should make early contact with the relevant regulators, including the Environment Agency, for abstraction licensing and water quality activity or groundwater activity permits, as well as the relevant water undertakers. Where the development is likely to have significant adverse effects on the water environment, the applicant should undertake an assessment of the existing status of the water environment and impacts of the proposed scheme on water quality, water resources and physical characteristics of the water environment as part of any Environmental Statement. The assessment should also include how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment (see paragraphs 4.69 to 4.82).

5.264 If a scheme involves improvements to existing infrastructure, where feasible, improvements should be made to discharges from that infrastructure if they currently contribute towards water body quality failures under the WFD Regulations. A permit under the Environmental Permitting Regulations may

¹⁶⁷ <http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/>

¹⁶⁸ [PFAS Plan: building a safer future together - GOV.UK](#)

¹⁶⁹ The Health and Safety Executive consulted on a proposed restriction to the use of PFAS in firefighting foam between August 2025 and February 2026 which is available here: [PFAS in firefighting foam \(FFF\) restriction proposal - Health and Safety Executive - Citizen Space](#)

also be required where improvements are being made to existing infrastructure, for example, the discharge of contaminated water from roads.

5.265 Under the Environmental Permitting Regulations¹⁷⁰, applicants are required to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids, for example from car parks or other areas of hard standing, during operation. Consent may be required for working near to a river from the relevant regulator and a pollution incident response plan is recommended.

5.266 Applicants should consider protective measures to control the risk of pollution to groundwater; this could include, for example, the use of protective barriers.

5.267 Any Environmental Statement should describe in relation to both the construction and operational phases of the development:

- The existing quality of waters affected by the proposed scheme, and how climate change will impact on this;
- Existing water resources affected by the proposed scheme, the impacts of the proposed scheme on water resources, and how climate change will impact on this;
- Existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed scheme, and any impact of physical modifications to these characteristics;
- Any impacts of the proposed scheme on water bodies or protected areas under the WFD Regulations and source protection zones around potable groundwater abstractions, and how climate change will impact on this; and
- Any cumulative effects.

5.268 The assessment should also identify protected areas and other water usages within the vicinity of any discharge, such as bathing waters, abstractions and fisheries at risk from proposed works and the permits / consents required. It should also identify opportunities, such as those included in the relevant local nature recovery strategy or catchment plan to improve water quality, for example, through nature-based approaches or solutions.

5.269 The applicant should assess the effects on the surrounding water and wastewater treatment network in cooperation with the relevant water and sewerage undertaker(s). It should also address any future water infrastructure needed for the scheme, including for supplies and sewerage treatment, and the effects on the surrounding water and wastewater treatment network. This assessment would be based on the additional wastewater flows which would need to be treated at sewage treatment works and should be developed through liaison with the relevant water and sewerage undertaker(s).

¹⁷⁰ [The Environmental Permitting \(England and Wales\) Regulations 2016](#)

Mitigation

- 5.270 The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. If an applicant needs new water infrastructure, significant supplies or impacts other water supplies, the applicant should consult with the local water undertaker and the Environment Agency.
- 5.271 The Secretary of State should consider whether the mitigation measures put forward by the applicant which are needed for operation and construction (and which may be over and above any which may form part of the DCO application) are acceptable. A construction management plan may help codify mitigation.
- 5.272 The scheme should adhere to any national standards for sustainable drainage systems. The Sustainable Drainage Systems Technical Standards¹⁷¹ introduced a hierarchical approach to drainage design that promotes the most sustainable approach but recognises the feasibility and use of conventional drainage systems as part of a sustainable solution for any given site and its constraints.
- 5.273 A scheme should identify opportunities and secure measures to protect and improve water quality and resources through green and blue infrastructure and sustainable drainage. This will help to achieve Environmental Improvement Plan objectives and potentially provide greater capacity to support infrastructure needs.
- 5.274 The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be marked clearly. This may also include the need for treatment of water, which may need a permit under the Environmental Permitting Regulations.

Decision making

- 5.275 Activities that discharge to the water environment are subject to pollution control and potentially the Environmental Permitting Regulations. The considerations set out at paragraphs 4.83 to 4.89 above on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the environment, and to the control regimes relating to works to, and structures in, on, or under, a controlled water.
- 5.276 The Secretary of State should generally give more weight to impacts on the water environment where a scheme would have adverse effects on the

¹⁷¹ <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

achievement of the environmental objectives established under the WFD Regulations.

- 5.277 The Secretary of State will need to be satisfied that a proposal has had regard to the Thames RBMP and the WFD Regulations. In terms of compliance with the WFD Regulations, the overall aim of development should be to meet the environmental objectives of water bodies under regulation 13 or, if appropriate, meet the exemption of being a modification, alteration, or sustainable development activity of overriding public interest under regulation 19 if appropriate. Any use of regulation 19 must be reported to the Environment Agency so it can be explained in the Thames river basin management plan.
- 5.278 The Secretary of State should consider the interactions of the scheme with other plans, such as Water Resources Management Plans.
- 5.279 The Secretary of State should consider proposals put forward by the applicant to mitigate adverse effects on the water environment, taking into account the likely impact of climate change on water availability, and whether appropriate requirements should be attached to any DCO and/or planning obligations. This should consider any views of the Environment Agency. If the Environment Agency continues to have concerns, and objects to the grant of DCO on the grounds of impacts on water quality / resources, the Secretary of State can grant consent, but will need to be satisfied that all reasonable steps have been taken by the applicant and the Environment Agency to try to resolve the concerns.

Historic Environment

Introduction

- 5.280 The area in and around Heathrow Airport contains a range of designated and non-designated heritage assets, including assets of the highest significance. These include Grade I listed buildings and their settings, conservation areas associated with historic settlements, and areas of archaeological interest reflecting long-standing patterns of occupation and land use. The existing airport and associated surface access infrastructure have already resulted in significant change to the historic environment. Any further expansion therefore has the potential to give rise to additional impacts on heritage assets, both directly and through effects on their setting, landscape context and historic character
- 5.281 The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
- 5.282 Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. Heritage assets may be buildings,

monuments, sites, places, areas or landscapes, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence, but also from its setting.¹⁷²

5.283 Some heritage assets have a level of significance that justifies official designation. Categories of designated heritage assets are:

- World Heritage Sites;
- Scheduled Monuments;
- Listed Buildings;
- Protected Wreck Sites;
- Protected Military Remains;
- Registered Parks and Gardens;
- Registered Battlefields; and
- Conservation Areas.¹⁷³

5.284 Non-designated heritage assets of archaeological interest that are demonstrably equivalent to Scheduled Monuments should be considered subject to the policies for designated heritage assets.¹⁷⁴ The absence of designation for such heritage assets does not indicate lower significance.

5.285 The Secretary of State will also consider the impacts on other non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration in that decision, even though those assets are of lesser value than designated heritage assets. The non-designated heritage assets would be identified either through the development plan process by local authorities, including through 'local listing', or through the nationally significant infrastructure project examination and decision-making process.

¹⁷² Setting of a heritage asset is the surroundings in which it is experienced. Its extent is not fixed, and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral

¹⁷³ The issuing of licences to undertake works on protected wreck sites in English waters is the responsibility of the Secretary of State for Culture, Media and Sport and does not form part of Development Consent Orders. The issuing of licences for protected military remains is the responsibility of the Secretary of State for Defence

¹⁷⁴ There will be archaeological interest in a heritage asset if it holds, or may potentially hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and the people and cultures that made them

Applicant's assessment

5.286 Under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017¹⁷⁵ all Schedule 1 developments (of which Heathrow expansion would be) must be accompanied by an Environmental Statement. As part of the Environmental Statement, the applicant will be expected to demonstrate, through proportionate assessment, a detailed understanding of the significance of heritage assets affected by the proposed development¹⁷⁶, including any contribution made by their setting, and to explain how harm has been avoided, minimised or mitigated in accordance with the statutory framework.

5.287 The level of detail should be proportionate to the asset's importance, and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. At a minimum, the relevant Historic Environment Record¹⁷⁷ should be consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary¹⁷⁸, a field evaluation. The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage asset affected can be adequately understood from the application and supporting documents.

5.288 Detailed studies will be required on those heritage assets affected by noise, light and indirect impacts based on the guidance provided in The Setting of Heritage Assets¹⁷⁹ and the Aviation Noise Metric.¹⁸⁰ Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to assess the impact.

5.289 The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible:

- Enhancing, through a range of measures such as sensitive design, the significance of heritage assets or setting affected;

¹⁷⁵ <https://www.legislation.gov.uk/uksi/2017/572/contents>

¹⁷⁶ The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, Sch 4, Paragraph 4,

¹⁷⁷ Historic Environment Records are information services maintained and updated by (or on behalf of) local authorities and National Park Authorities with a view to providing access to comprehensive and dynamic resources relating to the historic environment of an area for public benefit and use. Details of Historic Environment Records in England are available from the Heritage Gateway website. Historic England should also be consulted where relevant

¹⁷⁸ The Secretary of State considers this will only be necessary where the desk-based assessment identifies areas of potential concern. Where a reasonable worst case has been assessed, except where exceptional circumstances apply, the Secretary of State considers that post-consent requirements which secure appropriate field evaluations will be sufficient

¹⁷⁹ <https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

¹⁸⁰ <https://www.historicengland.org.uk/images-books/publications/aviation-noise-metric/>

- Considering measures that address those heritage assets that are at risk, or which may become at risk, as a result of the scheme; and
- Considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to or interpretation, understanding and appreciation of the heritage assets affected by the scheme.

5.290 Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary or permanent.

Decision making

5.291 In determining applications, the Secretary of State will seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise, from:

- Relevant information provided with the application and, where applicable, relevant information submitted during examination of the application;
- Any designation records included on the National Heritage List for England;
- Historic landscape character records;
- The relevant Historic Environment Record(s) and similar sources of information;
- Representations made by interested parties during the examination; and
- Expert advice, where appropriate and when the need to understand the significance of the heritage asset demands it.

5.292 The Secretary of State must also comply with the regime relating to Listed Buildings, Conservation Areas and Scheduled Monuments set out in The Infrastructure Planning (Decisions) Regulations 2010¹⁸¹

5.293 In considering the impact of a proposed development on any heritage assets, the Secretary of State will take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.

5.294 The Secretary of State will take into account: the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets; the contribution of their settings; and the positive contribution their conservation can make to supporting sustainable communities – including to their quality of life, their economic vitality, and to the public's enjoyment of these assets. The

¹⁸¹ <http://www.legislation.gov.uk/uksi/2010/305/regulation/3/made>

Secretary of State will also take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example screen planting).

5.295 When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State will give great weight to the asset's conservation. The more important the asset, the greater the weight should be. The Secretary of State will take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality, and the desirability of new development making a positive contribution to local character and distinctiveness.

5.296 Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

5.297 Substantial harm to or loss of a Grade II Listed Building or a Grade II Registered Park or Garden should be exceptional. Substantial harm to or loss of designated sites of the highest significance, including World Heritage Sites, Scheduled Monuments, Grade I and II* Listed Buildings, Protected Wreck Sites, Registered Battlefields, and Grade I and II* Registered Parks and Gardens should be wholly exceptional.

5.298 Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss.

5.299 Where the proposed development will lead to substantial harm to or the total loss of significance of a designated heritage asset, the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm, or alternatively that all of the following apply:

- The nature of the heritage asset prevents all reasonable uses of the site;
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- Conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and
- The harm or loss is outweighed by the benefit of bringing the site back into use.

- 5.300 Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 5.301 Not all elements of a World Heritage Site or conservation area will necessarily contribute to its significance. The Secretary of State will treat the loss of a building (or other element) that makes a positive contribution to the significance of a World Heritage Site or conservation area's significance either as substantial harm or less than substantial harm, as appropriate, taking into account the relative significance of the elements affected and their contribution to the significance of the World Heritage Site or conservation area as a whole.
- 5.302 Where the loss of significance of any heritage asset is justified on the merits of the new development, the Secretary of State will consider imposing a requirement on the consent, or require the applicant to enter into an obligation, that will prevent the loss occurring until it is reasonably certain that the relevant part of the development is to proceed.
- 5.303 The applicant should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance and better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.¹⁸²

Recording

- 5.304 A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given.
- 5.305 Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the nature and level of the asset's significance. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it.
- 5.306 Where appropriate, the Secretary of State will impose requirements to the DCO to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in the Heathrow Expansion NPS and that the completion of the exercise is properly secured.

¹⁸² Further good practice advice on decision making in the historic environment can be found at: <https://www.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

5.307 Where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.

Landscape and visual impacts

Introduction

5.308 For development covered by this NPS, landscape and visual effects also include tranquillity effects, which would affect people's enjoyment of the natural environment and recreational facilities. In this context, references to landscape should be taken as covering local landscape, waterscape and townscape character and quality, where appropriate.

Applicant's assessment

5.309 The applicant should carry out a landscape and visual impact assessment and report it in the Environmental Statement, including cumulative effects. Several guides have been produced to assist in addressing landscape issues¹.

5.310 The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents.

5.311 The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the Environmental Statement how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme.

5.312 The applicant's assessment should include any significant effects during construction of the scheme and the significant effects of the completed development and its operation on landscape components and landscape character, including historic characterisation. This should include assessment of any landscape and visual impacts as a result of the development, for example surface access proposals or aviation activity.

5.313 The assessment should include the visibility and conspicuousness of the scheme during construction and the presence and operation of the scheme and potential impacts on views and visual amenity. This should

include any noise and light pollution effects, including on local amenity, tranquillity and nature conservation.

- 5.314 Applicants should consider how landscapes can be enhanced using landscape management plans to help enhance environmental assets where they contribute to landscape and townscape quality.

Mitigation

- 5.315 Adverse landscape and visual effects may be minimised through appropriate design (including choice of materials), and landscaping schemes. Materials and designs for the scheme should be given careful consideration.

Decision making

Landscape impact

- 5.316 Landscape effects depend on the nature of the existing landscape likely to be changed and nature of the effect likely to occur. Both these factors need to be considered in judging the impact of the scheme on the landscape. The scheme needs to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the development should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.
- 5.317 The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.
- 5.318 The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements for landscape and visual impacts.

Development proposed within, or affecting, nationally designated areas

- 5.319 When discharging functions which affect land in National Parks, National Landscapes and the Norfolk and Suffolk Broads (collectively referred to in this section as Protected Landscapes) in England, relevant authorities have a legal duty to seek to further the statutory purposes of those areas. The Department for Environment, Food and Rural Affairs has published guidance on the Protected Landscapes Duty, to which applicants should have regard. Projects should be designed sensitively given the various siting, operational, and other relevant constraints, and considering these statutory purposes.
- 5.320 When considering applications for development within Protected Landscapes, the conservation and enhancement of the natural beauty of these

areas should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:

- The need for the development, including in terms of national considerations³ and the impact of consenting or not consenting it upon the local economy;
- The cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way; and
- Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

5.321 For development proposals located within Protected Landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are appropriate, reasonable and proportionate to the form. The Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary.

5.322 The duty to seek to further the purposes of Protected Landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on the designation. Such projects should be designed sensitively given the various siting, operational, and other relevant constraints.

5.323 The CAA will be responsible for meeting the Protected Landscape Duty when carrying out its functions, including considering the impacts on protected landscapes from flightpath changes.

Development in other areas

5.324 Outside nationally designated areas, there are local landscapes and townscapes that may be protected by local designation. Where a local development document in England has policies based on landscape character assessment, these should be given particular consideration. However, local landscape designations should not be used in themselves as reasons to refuse consent, as this may unduly restrict acceptable development.

5.325 In taking decisions, the Secretary of State will consider whether the preferred scheme has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by appropriate mitigation.

Visual impact

5.326 The proposed expansion is likely to have visual effects for receptors around the proposed site. The Secretary of State will judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development.

Land instability

Introduction

5.327 The effects of land instability may include subsidence, ground heave, settlement or slope instability. If not properly identified and addressed, these issues could cause harm to human health, property, infrastructure and the wider environment. Such risks can arise in different circumstances, vary in their predictability and may affect the suitability of land for development.

Applicant's assessment

5.328 Given the nature and location of the Heathrow Northwest Runway scheme, the applicant should assess the risk of land instability, subsidence and any other relevant ground condition impacts arising from the development, and should consult the relevant statutory bodies and technical authorities where such risks are identified.

5.329 A preliminary assessment of ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. The applicant should ensure that any necessary investigations are undertaken by a competent person¹⁸³ to confirm that their sites are and will remain stable, or can be made so as part of the development. The site needs to be assessed in the context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report.

Mitigation

5.330 The applicant has a range of mechanisms available to mitigate and minimise risks of land instability. These include:

- Establishing the principle and layout of new development, so as to avoid or reduce exposure to identified ground hazards;

¹⁸³ Competent person (to prepare site investigation information): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.

- Ensuring the proper design of structures and earthworks to accommodate or withstand anticipated ground movement and other relevant geotechnical risks; or
- Using ground improvement techniques, where necessary, including the removal or treatment of unsuitable material and its replacement with suitable inert and stable material.

Dust, odour, artificial light, smoke and steam

Introduction

5.331 The construction and operation of airports infrastructure has the potential to create a range of emissions such as dust, odour, artificial light, smoke and steam. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990.¹⁸⁴ These may also be covered by pollution control or other environmental consenting regimes.

5.332 Because of the potential effects of these emissions and in view of the availability of the defence of statutory authority against nuisance claims described previously, it is important that the potential for these impacts is considered by the applicant in its application, by the Examining Authority in examining applications, and by the Secretary of State in taking decisions on development consent.

5.333 For nationally significant infrastructure projects of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. Impacts should be kept to a minimum and should be at a level that is acceptable.

Applicant's assessment

5.334 Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of dust, odour, artificial light, smoke and steam, and describe these in the Environmental Statement.

5.335 In particular, the assessment provided by the applicant should describe:

- The type and quantity of emissions;
- Aspects of the development which may give rise to emissions during construction, operation and decommissioning;
- Premises or locations that may be affected by the emissions;

¹⁸⁴ <http://www.legislation.gov.uk/ukpga/1990/43/part/III>

- Effects of the emission on identified premises or locations; and
- Measures to be employed in preventing or mitigating the emissions.

5.336 The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency, about the scope and methodology of the assessment.

Mitigation

5.337 The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of dust, odour, artificial light, smoke and steam from the development to reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help clarify and secure mitigation.

Decision making

5.338 The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of dust, odour, artificial light, smoke and steam. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

5.339 If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the DCO.

Community compensation

Introduction

5.340 The Secretary of State recognises that, in addition to providing economic growth and employment opportunities, development covered by this NPS will also have negative impacts upon local communities. This will include impacts through land take requiring the compulsory acquisition of houses that fall within the new boundary of the airport, exposure to air quality impacts, and aircraft noise, that is both an annoyance and can have an adverse impact on health and cognitive development.

5.341 The Secretary of State expects the applicant to provide an appropriate community compensation package, relevant to planning, that goes beyond the

statutory requirements. This will include financial compensation for residents who will see their homes compulsorily acquired, as well as ongoing financial compensation to the local community. In addition to controlling and reducing aircraft noise impacts, the applicant will be required to commit appropriate resources to mitigate the impacts of aircraft through noise insulation programmes for both private homes and public buildings such as schools.

5.342 A number of statutory protections are provided in these areas, and the applicant must fulfil its statutory duties in a timely and efficient manner.

5.343 Under planning law, residential and agricultural owners in the area within the red line on the scheme boundary map shown in Annex A have been able to make a claim for statutory blight since the designation of the Airports NPS.

5.344 In addition, compensation can be sought in respect of loss of value of a property arising from the development during construction (under the Compulsory Purchase Act 1965)¹⁸⁵ and for loss of value arising from the operation of an expanded airport (under Part 1 of the Land Compensation Act 1973)¹⁸⁶ after one year of operation.

5.345 People are entitled to know what steps will be taken to help protect them against aircraft noise and, where appropriate, to help them to move house.

5.346 In addition to statutory requirements, the applicant will be expected to offer the following, or equivalent or better, compensation:

- To pay 125% of market value, plus taxes and reasonable moving costs, for all owner-occupied homes within the compulsory acquisition zone;
- To pay 125% of market value, plus taxes and reasonable moving costs, for all owner-occupied homes within an additional voluntary purchase / acquisition zone incorporating the area known as the Heathrow Villages;
- To offer to provide full acoustic insulation for residential property within the full single mode easterly and westerly 60 dB LAeq,16h¹⁸⁷ noise contour of an expanded airport;
- To provide a contribution of up to £3,000 for acoustic insulation for residential properties within the full single mode easterly and westerly 57 dB LAeq,16h or the full 55 dB Lden¹⁸⁸ noise contours of an expanded airport, whichever is the bigger; and

¹⁸⁵ <http://www.legislation.gov.uk/ukpga/1965/56/contents>

¹⁸⁶ <http://www.legislation.gov.uk/ukpga/1973/26/contents>

¹⁸⁷ LAeq is a noise measurement metric defined as the A-weighted Equivalent Continuous Sound Level, representing the average noise level experienced over a specified period as a single value in decibels (dB). It is expressed as LAeq,16h for the 16-hour daytime period (07:00-23:00) and LAeq, 8h for the 8-hour nighttime period (23:00-07:00), and has historically been calculated over the 92-day summer period from 16 June to 15 September inclusive

¹⁸⁸ Lden is the 24 hour LAeq calculated for an annual period, but with a five decibel weighting for evening and a ten decibel weighting for night to reflect people's greater sensitivity to noise within these periods

- To deliver a programme of noise insulation and ventilation for schools and community buildings within the full single mode easterly and westerly 60 dB LAeq,16h contour.

5.347 In addition to the statutory requirements and a community compensation package, the Government also supports the Airports Commission's recommendation for an additional component of ongoing community compensation proportionate to environmental impacts.

5.348 The Airports Commission suggested this should take the form of a national noise levy paid for by passengers. The Government does not consider a national levy appropriate, but supports the development of a community compensation fund at an expanded Heathrow Airport. The Government expects that the size of the community compensation fund will be proportionate to the environmental harm caused by expansion of the airport. The Government notes that, in its consideration of a noise levy, the Airports Commission considered that a sum of £50 million per annum could be an appropriate amount at an expanded Heathrow Airport, and that, over a 15-year period, a community compensation fund could therefore distribute £750 million to local communities.

5.349 Expansion at Heathrow Airport is likely to increase the amount of locally collected business rates in the area. The Government will consider how authorities can benefit from this through a business rate retention scheme and the opportunities for authorities to work together to share the benefits. Heathrow Airport is consistently one of the highest single-site business rates payers in the UK.

Applicant's assessment

5.350 The Government expects to see arrangements being made for a community compensation package at least to the level set out at paragraph 5.346, and for a community compensation fund.

5.351 The applicant should seek to minimise impacts on local people, to consult on the details of its works, and to put them in place quickly. The applicant should also consult on the detail of a community compensation fund.

5.352 The Government recognises that the relocation of residents, and the wider impacts of major development on local communities, could have a health effect on wellbeing associated with stress and anxiety¹⁸⁹. An applicant is expected to put in place appropriate support services to assist residents within the Compulsory Purchase Zone, including identifying vulnerable residents who may need additional assistance to relocate. The applicant should also consider residents living outside the Compulsory Purchase Zone but within communities that may be significantly affected by the development, including those immediately adjacent to the Compulsory Purchase Zone or who will

¹⁸⁹ <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement-health-impact-analysis>

experience dramatic changes to their living environment because of Heathrow expansion.

5.353 The applicant should demonstrate that it has considered the need for staff, engaging directly with affected residents, having the ability to recognise and respond to the mental health effects associated with the development. This could include ensuring those staff members have received appropriate mental health awareness training, working with local support groups that have insight into vulnerable residents or communities, and establishing named contacts to facilitate one to one communication and a clear understanding of individual needs. The specific support the applicant will need to provide will depend on the issues faced by individual residents. The applicant should ensure it has appropriate services in place so that residents with additional needs are not disadvantaged.

Decision making

5.354 The Secretary of State will consider whether and to what extent the applicant has sought to minimise impacts on local people, has consulted on the details of its works, and has put mitigations in place, at least to the level set out at paragraph 5.346. This includes whether the applicant has set out appropriate eligibility criteria, how delivery will be ensured, and whether the applicant has made reasonable efforts to put the works in place quickly.

5.355 The Secretary of State will also consider whether the applicant has consulted on the details of a community compensation fund, including source of revenue, size and duration of fund, eligibility, and how delivery will be ensured.

5.356 The Secretary of State will expect the applicant to demonstrate how these provisions are secured, and how they will be operated. The applicant will also need to show how these measures will be administered to ensure that they are relevant to planning when in operation. The mechanisms for enforcing these provisions should also be demonstrated, along with the appropriateness of any identified enforcing body, which may include the Secretary of State.

Community engagement

Introduction

5.357 The Government recognises that the planning, construction, and subsequent operation of a Northwest Runway will bring both significant impacts and opportunities to communities living around Heathrow Airport. Communities will wish to participate fully in the development and delivery of expansion, and the Government expects them to be able to do so.

5.358 There will be many opportunities for communities to engage as expansion is taken forward. The Government is required to consult on and publicise new and amended National Policy Statements. The Planning and Infrastructure Act 2025 has removed the statutory requirement for pre-application consultation

for Nationally Significant Infrastructure Project applications. The Government, however, still expect high-quality early, meaningful and constructive engagement and consultation to take place with those affected by Nationally Significant Infrastructure Project proposals and will publish guidance to that effect. The applicant should follow any available Government guidance on non-statutory consultation and engagement during the pre-application stage of the DCO process. Additional consultations on issues such as airspace change, overseen by the Civil Aviation Authority, will take place outside of the planning process. Ongoing engagement will also be required as the applicant takes forward its compensation package.

5.359 The Government wishes to maximise local stakeholder engagement with the expansion process, and it wishes to encourage any applicant and local stakeholders to strengthen the way in which the airport and local stakeholders work together to make engagement effective. Local stakeholders, including those representing communities around Heathrow Airport, have the experience and expertise to identify solutions tailored to their specific circumstances. A number of engagement forums already exist at Heathrow Airport. These have developed over time in response to emerging needs and are consistent with the Government's view that, in principle, it encourages collaborative local solutions.

5.360 A community engagement board is required to be developed at Heathrow Airport to help ensure that local communities can contribute effectively to the delivery of expansion, including to consultations and evidence gathering during the planning process. It is considered this board should be established through the Council for the Independent Scrutiny of Heathrow Airport (CISHA) or through arrangements closely linked to CISHA, recognising its existing role in independent community scrutiny at Heathrow Airport.

Applicant's assessment

5.361 The applicant must engage constructively with the community engagement board throughout the planning process, with its membership (including an independent chair), and with any programme(s) of work the community engagement board agrees to take forward.

Decision making

5.362 The Secretary of State will consider whether the applicant has engaged constructively with this community engagement board throughout the planning process.

Skills

Introduction

5.363 The Government is committed to supporting an extra 50,000 young people into apprenticeships. As part of this, the Government is transforming the apprenticeships levy into a new growth and skills levy in England¹⁹⁰, to deliver greater flexibility to employers, more opportunities for young people, and to support the Industrial Strategy.

5.364 To give employers greater flexibility, the Government has launched the first apprenticeship units from April 2026, focussing on priority sectors including artificial intelligence (AI), construction and engineering. Funding for the growth and skills levy in England has increased to a record £3.3 billion for the 2026-2027 financial year. This will play an integral role towards the Government's ambition to get two-thirds of young people into higher-level learning or apprenticeships. The growth and skills levy will help employers meet their business skills needs more quickly, and the Government remains committed to investment in major infrastructure projects leading to high-quality jobs, skills development, and apprenticeships.

5.365 The Government expects any promoter to demonstrate that they can make a significant contribution to local employment and outline any skills and early employment initiatives designed to support the business needs of the airport. The Government considers the creation of high-quality employment, skills and training opportunities an important benefit of airport expansion. Proposals for the expansion of airport capacity are therefore expected to contribute to youth employment, skills development and long-term workforce capability. The Heathrow Academy supports recruitment and retention of local residents across the retail, construction, aviation and logistics sectors, and includes apprenticeships as part of the package.¹⁹¹

5.366 The Heathrow Northwest Runway scheme represents an opportunity to grow the number of jobs and apprenticeships supported by the applicant and its supply chain and airport-related businesses, particularly in neighbouring communities.

Applicant's assessment

5.367 Any promoter of airport expansion at Heathrow should prepare and submit a Youth Employment and Skills Plan, covering both the construction and operational phases of the proposal. The plan should set out how the promoter will:

¹⁹⁰ <https://find-employer-schemes.education.gov.uk/interim/growth-and-skills-levy>

¹⁹¹ <http://www.heathrow.com/company/heathrow-jobs/heathrow-academy>

- Support the delivery of 5,000 youth apprenticeships, traineeships and other recognised entry-level pathways;
- Provide opportunities for work placements, work experience and work-readiness training pathways for people in their workforce; and
- Engage and work with local education and training providers, Skills Bootcamp providers, further education colleges and employment support organisations to maximise local participation.

5.368 The Youth Employment and Skills Plan should be proportionate to the scale of the proposed expansion and the resulting labour market capabilities, and should set out:

- The anticipated workforce requirements arising from the construction and operation phases of the development;
- The measures and commitments through which youth employment and training opportunities will be delivered, including apprenticeships, work placements and pre-employment training; and
- The monitoring and reporting arrangements by which delivery of these commitments would be tracked over time.

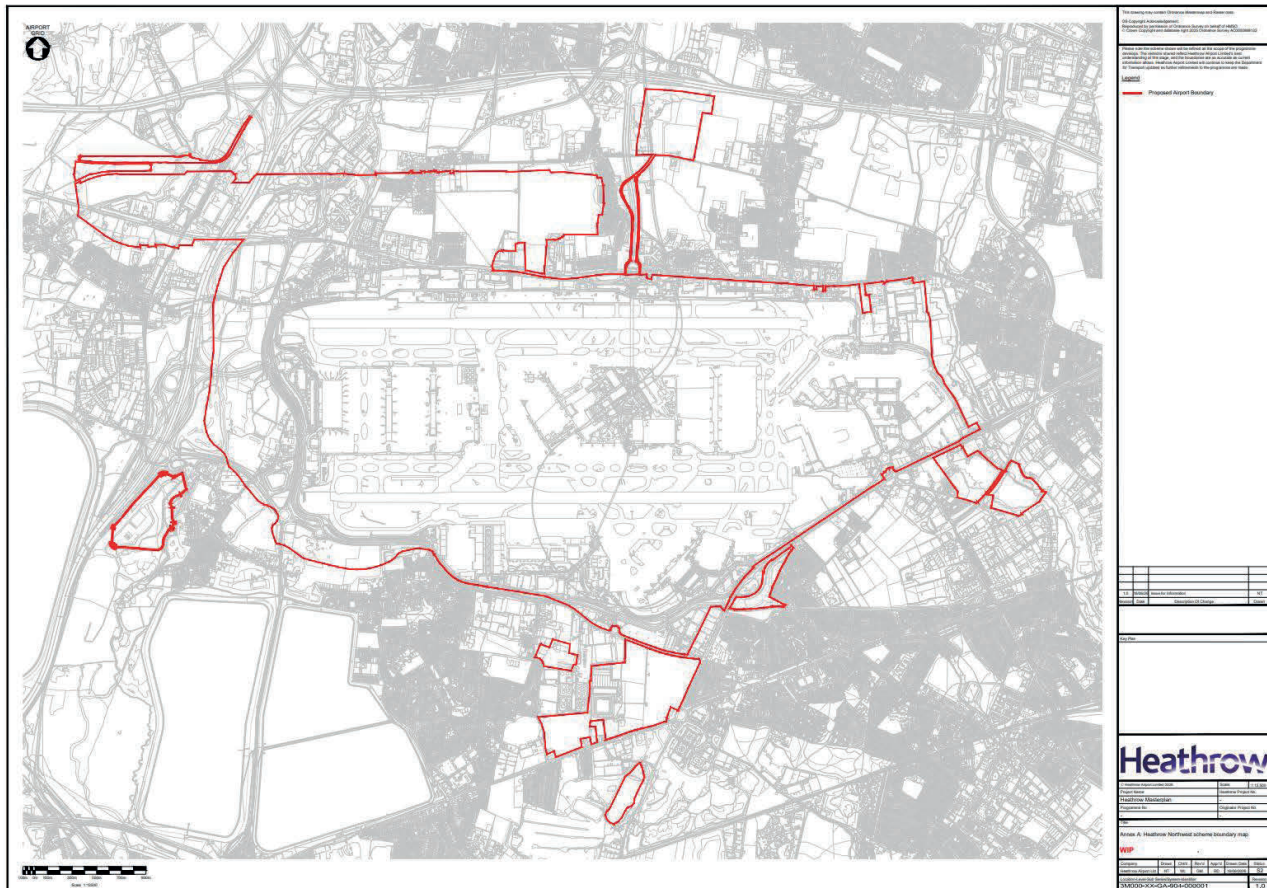
5.369 Where precise numbers cannot be confirmed at the time of application, the applicant's plan should set out minimum commitments, delivery mechanisms and review points, including how targets will be updated as its workforce requirements become clearer.

5.370 The applicant will also need to show how these measures will be administered to ensure that they are relevant to planning when in operation. The mechanisms for enforcing these provisions should also be demonstrated, along with the appropriateness of any identified enforcing body, which may include the Secretary of State.

Decision making

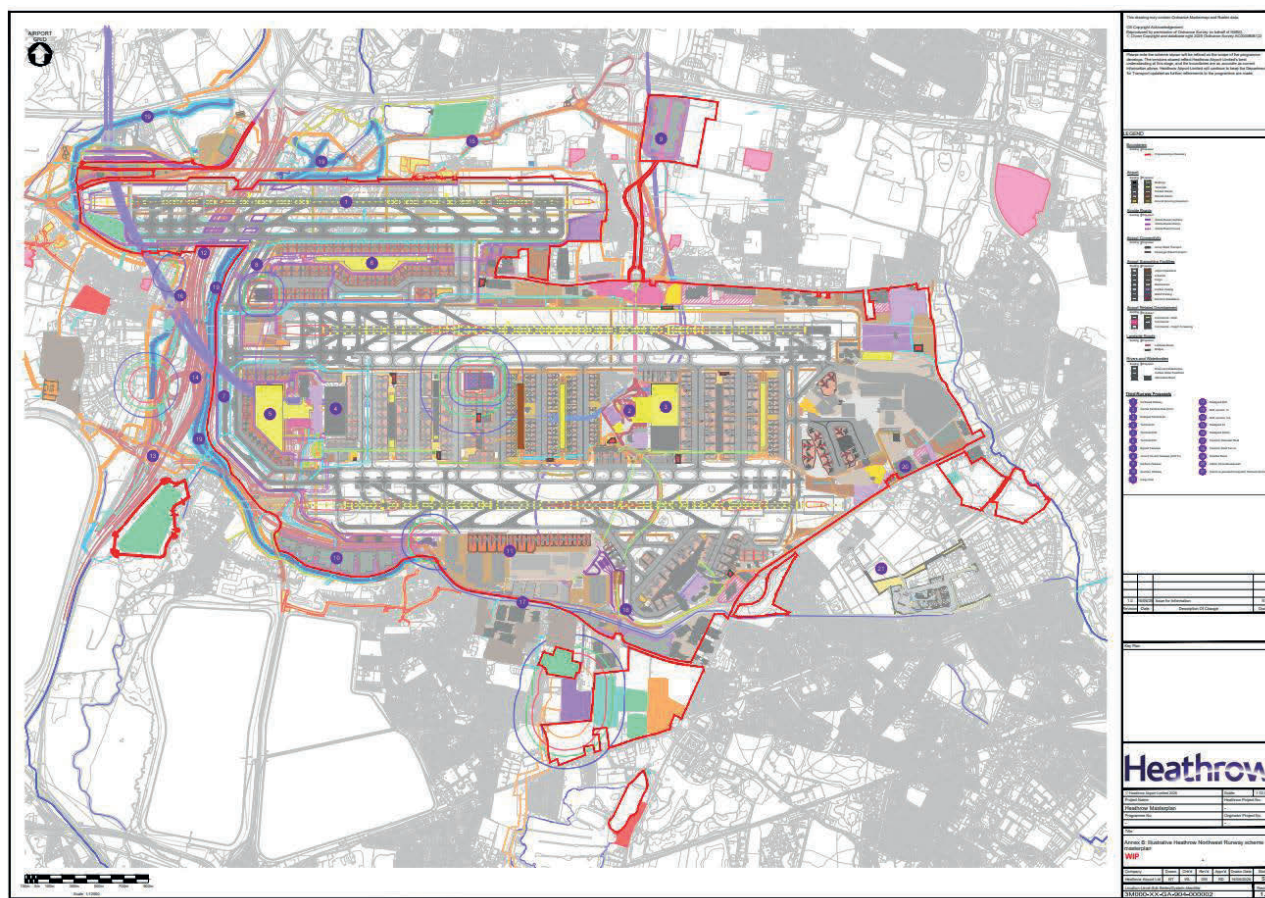
5.371 The Secretary of State will consider whether the applicant has set out a Youth Employment and Skills Plan which provides credible, deliverable and appropriately secured commitments to deliver apprenticeships and skills development at an expanded airport. The Secretary of State will consider how these provisions are secured, and how they will be operated. They may consider the use of requirements or obligations to ensure delivery.

Annex A: Indicative scheme boundary map



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Annex B: Indicative scheme masterplan



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NB: This map is for illustrative purposes and is a masterplan of the Heathrow Northwest Runway scheme as submitted by Heathrow Airport Limited to the Department of Transport in July 2025 following a request for proposals. It should not be considered as a detailed site plan; the full detail and design of the scheme will be considered as part of any applicant's development consent application.