

Draft Heathrow Expansion National Policy Statement proposed amendments

Your information

Q1. What is your name?

Andrew Lambourne

Q2. What is your email address?

info@ladacan.org

Q3. Are you responding on behalf of an organisation?

Yes

Organisation details

Q4. What is the name of your organisation?

Luton And District Association for the Control of Aircraft Noise

Q5. How many people does your organisation's response represent?

101 to 500 people

Consultation description

Q6. To what extent do you agree or disagree with the assessment of the need for the proposed expansion of Heathrow Airport?

Strongly disagree

Assessment of the need

Q7. Explain your answer.

Growth does not require Heathrow expansion specifically

The DfT's own 2026 Aviation Forecast shows that national passenger growth is largely insensitive to where in the UK such growth is accommodated. The Regional scenario (population redistributed away from the South East), national 2050 passenger totals are within 0.1 million of the Current Trends baseline (490.7m vs 490.6m) – only the geographic distribution changes, not the UK total.

Source: AVF, Table 6-4 / para 6.10, pp.83-84.

DfT states explicitly that its own forecasts “should not be considered as a cap on the development of individual airports or be considered the maximum level of demand the sector may see,” undercutting any framing that a Heathrow third runway is the only route to meeting demand.

Source: AVF, paras 2.7-2.10, p.16.

DfT's own without-expansion baseline already shows strong growth: UK passenger numbers rising from 292 million (2024) to 487 million by 2055, driven by already-approved expansions at Luton, Stansted, London City and Gatwick.

Source: HEAR, paras 2.4, 2.8; Figures 2-1/2-2, pp.11-13; Table 3-5, p.20.

The central forecast growth rate used to justify the scheme (2.0% per year, 2024-2050) is itself below the observed pre-pandemic historic trend (2.8% per year, 2000-2019) – DfT's own central case does not assume accelerating demand, but rather a slowing from the historic trend.

Source: AVF, paras 1.18, 6.8, pp.12-13, 81.

Displacement, not new demand, dominates the early decades

The Government's own SCGE modelling states that in the initial phase following expansion there is “a nearly 1 to 1 displacement from other airports to Heathrow,” with material net UK-wide passenger growth only from the early 2050s. Even after any third runway opens (assumed c.2038), passenger numbers “remain constrained until the point increased terminal capacity is fully delivered, assumed to be in the 2050s.”

Source: CGE, pp.6, 19-20, Figure 6.

Growth outside London barely changes, or falls, with expansion

DfT's own HEAR states that by 2055, passenger volumes at airports outside London will be 1% lower with expansion than without it – the expansion is chiefly a London-system effect, not a national one, which is inconsistent with any 'levelling up' framing of the scheme.

Source: HEAR, para 3.12, p.21.

The economic case for 'need' is weak and uncertain even in the Government's own words

The draft HENPS itself states, summarising its own Appraisal of Sustainability: “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.” This is a direct admission, from the Government's own evidence base, of the displacement risk that underlies LADACAN's economic objection.

Source: HENPS, para 1.29, p.12; consistent with AoS, p.8, NTS6.

The externally commissioned GDP estimate finds the scheme could add “up to 0.05% to GDP” by 2056 – a strikingly small figure for a scheme of this cost and controversy, and one not given headline prominence in the HENPS text.

Source: HENPS, para 5.90, p.78; consistent with CGE, Table 1, p.5 (0.052%).

The Government's own cost-benefit appraisal is negative under every scenario tested

HEAR's Net Present Value ranges from –£23.4bn to –£62.5bn (UK-passenger-only basis) or –£82.2bn to –£120.6bn (all-passengers basis), depending on cost pass-through and carbon accounting assumptions. No scenario in the report – Current Trends, Technology Development, with or without cost pass-through, on either carbon basis – produces a positive NPV.

Source: HEAR, Executive Summary p.6; Table 8-1, p.46; Table B-1, pp.62-63.

The Executive Summary of HEAR states outright: “With cost pass through, environmental dis-benefits outweigh total benefits.”

Source: HEAR, Executive Summary, p.6.

Any economic benefit that does exist is not primarily an aviation benefit

The Government's own CGE modelling finds that “given limited passenger uplifts, the primary driver of GDP growth effects is capital expenditure, which is a constant across all scenarios” – i.e. the modest GDP benefit is mostly a generic construction-spending stimulus, not a benefit specific to aviation growth. The report's own 'dummy' scenario isolating operational (non-construction) effects shows an NPV of just £2.7bn, versus £14.5bn including construction spending – meaning over 80% of the modelled benefit comes from building the runway, not from operating it.

Source: CGE, p.7, p.44-45, Table 1.

We would also note an apparent internal inconsistency in the CGE report that DfT should resolve: the Executive Summary states the core-scenario NPV as “around £22 billion” (p.26), while Table 1 (p.5) gives

Q7. Explain your answer.

£14,521.8m for the same scenario. This should be clarified before either figure is relied upon.

The negative balance of payments in tourism is directly supported by the Government's own modelling. The Frontier Economics CGE report states plainly: "The effects of capacity expansion are more pronounced for the outbound travel of UK residents than they are for the inbound travel of foreign visitors; and outbound spending is several times the magnitude of inbound spending under both baseline and expansion cases," and separately that "passenger spending effects tend to be net negative in terms of GDP contributions as outbound spending by UK residents travelling abroad typically exceeds spending by inbound visitors."

Source: CGE, p.7, p.21, Figure 8, p.27.

This is direct, government-commissioned evidence that the net economic benefit of additional Heathrow capacity is weaker than headline passenger or GDP figures suggest, once the outbound spending deficit is properly accounted for – precisely LADACAN's long-standing position.

The UK's tourism trade deficit is large, structural, and predominantly air-travel driven

The Government's own official statistics corroborate this point independently of the CGE modelling. ONS Travel Trends data show a record £33.9 billion UK tourism trade deficit in 2019 – UK residents made 93.1 million visits abroad, spending £62.3 billion overseas, against 40.9 million visits to the UK by overseas residents, who spent £28.4 billion here – with 88.2% of that deficit attributable to air travel.

Source: Office for National Statistics, Travel Trends: 2019.

The most recent full-year data show this deficit has since widened materially. ONS's Travel Trends: 2024 release (published 26 August 2025) records that UK residents made an estimated 94.6 million visits abroad in 2024, spending an estimated £78.6 billion, against 42.6 million visits to the UK by overseas residents, who spent an estimated £32.5 billion – a tourism trade deficit of approximately £46.1 billion. Set against the UK's total current account deficit of £63.2 billion in 2024 (ONS Balance of Payments, Pink Book 2025), the tourism deficit alone accounts for approximately 73% of the UK's entire current-account shortfall for the year.

Source: Office for National Statistics, Travel Trends: 2024 (released 26 August 2025); Office for National Statistics, United Kingdom Balance of Payments, The Pink Book: 2025.

We note that ONS labels the 2024 Travel Trends estimates as "official statistics in development" rather than finalised official statistics, pending resolution of some methodological issues affecting Q3/Q4 2024 data (including a disclosed airport-code mis-assignment affecting 7-7.5% of cases). ONS states these known issues tend to cause an underestimate of UK residents' overseas spending, and therefore of the deficit – meaning the true 2024 figure is, if anything, more likely to be understated than overstated by this data.

This is a structural, not incidental, feature of UK aviation: the single largest component of the UK's international tourism deficit is spending by UK residents flying abroad, and Heathrow – as the UK's dominant hub – is the primary gateway for that outbound spend. Expanding capacity on economic growth grounds, when the sector's dominant balance-of-payments effect runs the other way, is a case that has simply not been made.

The scale of UK climate damage dwarfs the claimed economic benefit of expansion

Even taken at face value, the scheme's claimed GDP benefit (0.052% by 2056, per the Government's own CGE modelling – see above) should be weighed against the Government's own evidence on the cost of unmitigated climate change to the UK economy. The Grantham Research Institute on Climate Change and the Environment (LSE) estimates UK climate damage on current global policy trajectories at a central c.10% of GDP, rising to c.15% with distributional weighting and up to 20% at 4°C of warming – against a net-zero transition cost the same research estimates at no more than c.2% of GDP, for a net benefit of around 4%.

The authors describe these damage figures as conservative lower bounds. Source: J. Rising et al., What will climate change cost the UK? (Grantham Research Institute, LSE; 2022, dataset updated 2025).

The point is one of proportion and coherence: a scheme whose own best-case economic benefit is a fraction of a percent of GDP, and whose principal environmental cost is a further contribution to UK aviation emissions, is difficult to justify on economic-growth grounds when set against a national climate damage exposure that the Government's own preferred research body puts at ten to twenty times that scale.

Jobs claims are not robust evidence of a national economic need

The Government's own CGE model assumes full employment in the long run, meaning "any increase in employment is transient" and the scheme "does not stimulate growth by mobilising hitherto dormant resources." Long-term national employment "returns to base" and is "determined by demography over time, not the individual scenario." This is a structural admission that the national jobs case cannot rest on this modelling.

Source: CGE, pp.14, 30.

Separately, the headline "up to 61,000 additional jobs" figure used elsewhere in the consultation package rests on job multipliers from a 2009 study (Optimal Economics), now over 16 years old, and on an

Q7. Explain your answer.

unresolved efficiency-ratio assumption for direct jobs. The Government's own Health Impact Analysis also states plainly that "some employment and economic activity associated with the scheme ... may be displaced from other airports and other parts of the economy". The same displacement caveat applied to the national growth figures is not consistently applied to the jobs figures elsewhere in the consultation package, which we consider an inconsistency the Department should address.
Source: HEAR, para 12.2, footnote 47, p.57; HIAAn, §1.4.105.

The harms from additional airport capacity in the UK would outweigh any benefits
The worsening climate crisis has led to successive heatwaves, with Europe acknowledged as the fastest-warming continent. Multiple wildfires, heat-related deaths and infrastructure damage have regularly been in the news throughout summer 2026. Aviation is one of the hardest sectors to decarbonise, and causes both CO2 and non-CO2 impacts. Responsible policy would see the government putting in place measures to damp demand for leisure air travel by measures such as frequent flier levies, investment in green alternatives such as rail travel, and ultimately demand management as part of climate adaptation. Given the context, policy which facilitates ongoing growth in aviation capacity demand is irrational and irresponsible.

The Government's own evidence does not establish that a new runway at Heathrow is required to meet UK aviation demand, even if that demand is as projected.

Four tests

Q8. To what extent do you agree or disagree with how we have set the air quality test?

Strongly disagree

Air quality test reasoning

Q9. Explain your answer.

The 2026 air quality analysis underpinning the HENPS is explicitly described by DfT as "indicative analysis (rather than full modelling)" – full quantified modelling is deferred to the applicant's future Environmental Statement, meaning the NPS is being designated without the more rigorous analysis that will ultimately determine real-world impact.
Source: HENPS, para 5.7, p.56.

DfT's own indicative analysis "suggests one existing monitoring site location could exceed [PM2.5] targets even without expansion" – an admission that background air quality risk already exists independently of the scheme, complicating any claim that expansion-specific mitigation alone can resolve it.

Source: HENPS, para 5.9, p.57.

DfT states that despite vehicle and ground-support emissions improvements, "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," and separately confirms there are "no legally binding objective concentrations for UFPs [ultrafine particles] and monitoring is less widespread," despite acknowledging UFPs as an emerging health-relevant issue near large airports.

Source: HENPS, paras 5.8, 5.10, p.57.

Critically, the decision test itself is calibrated to "no new breach" of legal limits, or not making an existing breach "materially worse" – not to "no deterioration." A deterioration in air quality is, in the Government's own words, "not necessarily a reason to refuse" consent.

Source: HENPS, paras 5.25-5.26, p.61; consistent with AoS, p.9, NTS6.

The Health Impact Analysis rates the overall operational effect on health as moderate adverse (significant) for the general population and major adverse (significant) for vulnerable groups – the most severe rating recorded anywhere in that document – while conceding evidence on the long-term health impacts of ultrafine particles is "still developing."

Source: HIAAn, §1.4.119, §1.4.131.

Noise test

Q10. To what extent do you agree or disagree with how we have set the noise test?

Strongly disagree

Noise test reasoning

Q11. Explain your answer.

Heathrow already has “the highest population exposure to aircraft noise of any airport in the UK or the European Union”: 359,700 households subject to daytime noise at 51dB LAeq,16h+ and 305,400 households to night-time noise at 45dB LAeq,8h+ (2024 data).
Source: HENPS, para 5.37, p.64.

The Government's own noise modelling shows overall exposure can be held to no more than 2024 levels only in aggregate: DfT explicitly states “the underlying nature of impacts would change” and that “while some areas would experience lower levels of noise, others would experience increases.” The noise test itself requires the scheme only to “avoid significant adverse impacts” and reduce noise “where reasonably possible” compared to 2024 – not to guarantee any individual household's exposure does not worsen.
Source: HENPS, paras 5.39, 5.55, pp.65, 68.

The Government acknowledges directly that “the duration of periods of respite that currently apply will be reduced” under the proposed runway alternation scheme post-expansion – an explicit admission that an existing form of noise relief for communities will actually be weakened, not merely risk being weakened.
Source: HENPS, para 5.46, p.67.

DfT accepts, citing its ANNE and ANAS evidence, that “people's sensitivity to noise has increased” and people are “more annoyed by aviation noise and at lower levels than previous evidence indicated” – meaning that even a strict repeat of past noise levels would now be expected to cause greater harm than the historic evidence base assumed.
Source: HENPS, para 5.30, p.62.

Most seriously, the noise case rests on an airspace design that does not yet exist. This is addressed in full under Question 12 below, but in summary: the noise assessment underpinning the HENPS uses “indicative” 2015 Airports Commission flight paths, because the UKADS redesign is not yet available. DfT itself flags that the eventual noise assessment “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” – an admission that the evidence underpinning the noise test may not survive to the point of decision, and therefore that a decision is premature.
Source: HENPS, paras 5.38, 5.41, pp.64, 66.

Climate change mitigation test

Q12. To what extent do you agree or disagree with how we have set the climate change mitigation test?

Strongly disagree

Climate change mitigation test reasoning

Q13. Explain your answer.

DfT's own 2026 forecasts show "more residual emissions in 2050 and a greater reliance on greenhouse gas removals than in the 2022 Jet Zero Strategy". The pathway to net zero aviation has weakened, not strengthened, since the Government's last strategy, even though DfT still asserts against all the evidence that net zero by 2050 "remains feasible."

Source: HENPS, para 5.65, p.72; consistent with AVF, paras 7.10-7.11, p.94.

The Current Trends central case now projects 41.1 MtCO₂e in 2050 (up from 37.0Mt in the 2022 Jet Zero Strategy), and even the more ambitious Technology Development scenario projects 28.1Mt (up from 19.3Mt in 2022) – driven by DfT cutting its assumed 2050 SAF uptake from 50% to 30% of the fuel mix, and revising SAF lifecycle savings down from 100% to 95%.

Source: AVF, paras 7.10-7.11, p.94.

Sustainable Aviation Fuel does not come close to displacing fossil kerosene even in the Government's central case: SAF reaches only 17% of the jet fuel mix by 2040 and is then held flat to 2050, meaning roughly 83% of jet fuel is still assumed to be fossil kerosene in 2050. SAF is also far more expensive than kerosene and the price gap is not expected to close: modelled 2025 prices are approximately £600/tonne for kerosene against a current £1,600/tonne for SAF which rises towards £2,000/tonne in the 2040s.

Source: AVF, paras 5.28, 5.29, 5.137-5.140, pp.50, 76.

The carbon price used to generate the Government's demand and emissions forecasts is, by DfT's own admission, already understated. The Current Trends scenario uses UK ETS prices reaching only £124-125/tCO₂ by 2050, based on DESNZ's November 2024 forecast; DfT states DESNZ "has since updated its forecasts, with projected ETS prices now significantly higher than those assumed in this publication over the period 2040-2050." The price used is also roughly a third of DfT's own official societal (appraisal) value of carbon (£443/tCO₂ by 2050) – and DfT's own sensitivity testing shows that pricing carbon at its full societal value would reduce 2050 passenger demand by 16%. In other words, the Government's own central case for the need for expansion is built on carbon being priced well below the Government's own official valuation of its cost to society.

Source: AVF, paras 8.25, 8.28-8.33, Table 8-3, pp.104-106.

This reading of the Government's own admission is corroborated by independent academic literature. Rennert et al., in a widely cited peer-reviewed study, put the central social cost of carbon at approximately US\$185 per tonne – itself far above the £125/tCO₂ traded price used to generate DfT's demand and emissions forecasts. Two independent lines of evidence – the Government's own official societal valuation and a leading independent academic estimate – both indicate the carbon price underpinning the 'need' case is materially below the true cost of the emissions involved.

Source: K. Rennert et al., "Comprehensive evidence implies a higher social cost of carbon," Nature 610 (2022).

More broadly, the Institute and Faculty of Actuaries and University of Exeter have assessed that the economic damage functions widely used in scenario modelling of this kind are "far too benign," because they exclude tipping points, severe impacts and second-order societal effects such as conflict and forced migration.

We raise this because it supports a general and directly relevant precautionary approach: where a scheme's economic case depends on a carbon price, that price should be treated as a floor, not a central estimate, and the true cost of the scheme's emissions is more likely to be understated than overstated by the evidence base before the Department.

Source: Institute and Faculty of Actuaries and University of Exeter, The Emperor's New Climate Scenarios (July 2023).

Non-CO₂ climate effects (contrails, NO_x, soot, water vapour) are not required to be quantified anywhere in this evidence base, only assessed qualitatively, with the HENPS itself citing "significant uncertainty" in the science as the reason – despite a growing body of academic literature suggesting these effects may be comparable in magnitude to CO₂ effects. Every headline CO₂e figure in the DfT's evidence base therefore understates aviation's true climate impact, by its own admission.

Source: HENPS, para 5.67, p.71; AVF, para 4.54, p.42.

The decision test itself is not scheme-specific: any carbon increase from the scheme alone is, in the Government's own words, not a reason to refuse consent unless it would "have a material impact on the UK's legally binding carbon budgets" at the economy-wide level, with operational emissions addressed "in a managed, economy-wide manner." This notoriously short-sighted test means that an airport expansion scheme with substantial emissions growth could still be permitted, regardless of whether the net effect of all similar schemes would have a material effect on carbon budgets. Any policy statement based on such an obvious fallacy would clearly be irresponsible and absurd.

Source: HENPS, paras 5.87-5.88, pp.77-78.

We highlight two scope choices that narrow what counts against the scheme in carbon budget terms: only outbound flight emissions are counted against UK carbon budgets (inbound emissions are acknowledged as quantifiable but excluded because "there is no relevant international benchmark to compare to"); and Carbon Budgets 1-5 (2008-2032) did not include the UK's share of international

Q13. Explain your answer.

aviation emissions at all, with inclusion only starting from Carbon Budget 6 (2033-37) – so most of the scheme's build-out period is not directly carbon-budget constrained in the way the public would reasonably expect.

Source: HENPS, paras 5.62, 5.70, pp.70, 72.

Finally, the mitigation package relies heavily on “significant and sustained investment” in engineered greenhouse gas removals (DACCS, BECCS) – technologies not yet deployed at scale – alongside the SAF Mandate and carbon pricing (UK ETS, CORSIA). Even the Technology Development scenario's residual 41.1Mt (Current Trends) or 28.1Mt figures are described as requiring offsetting or removal to reach “net zero aviation” – the modelling does not show the sector decarbonising on a gross basis.

Source: HENPS, para 5.77, p.74; AVF, para 7.15, p.95.

Economic growth across the country test

Q14. To what extent do you agree or disagree with how we have set the economic growth across the country test?

Strongly disagree

Economic growth across the country test reasoning

Q15. Explain your answer.

This is addressed in detail under Question 1 above. In summary: HEAR's own cost-benefit appraisal shows a negative Net Present Value under every scenario tested, with environmental disbenefits outweighing total benefits once cost pass-through is included; the GDP uplift found by the Government's own CGE modelling is 0.052% by 2056 and is driven predominantly by construction spending rather than aviation activity; and the national employment modelling structurally assumes away any net long-term jobs gain. We do not consider the economic growth test to be met.

Environmental mitigation measures

Q16. To what extent do you agree or disagree that the proposed mitigation measures for environmental impacts resulting from Heathrow expansion requirements are deliverable, effective and proportionate?

Strongly disagree

Environmental mitigation measures reasoning

Q17. Explain your answer.

Several of the most significant mitigation commitments are non-binding, unfunded, or explicitly deferred to later stages of the process, which is inconsistent with placing weight on them now.

On surface access, DfT's own Appraisal Report admits it has not costed the surface access mitigation package: "analysts have not estimated the full costs and benefits of additional surface access schemes beyond those included in previous work," citing "uncertainty around what measures promoters will deliver to achieve surface access targets and their associated impacts." This is a significant appraisal gap: surface access mitigation is central to managing the wider impacts.
Source: HEAR, para 6.7, p.33.

The companion Strategic Vision for Transport document is explicitly "non-binding" and "conceptual," committing neither Government nor promoter to any specific scheme. Both indicative rail options remain undeveloped: no promoter, funding source, or delivery date is confirmed for either, and the Government requires only a "credible plan" for new rail links – not a delivered scheme – before capacity reaches 130 million passengers per annum. The draft HENPS confirms that "the Government does not consider that all such rail enhancements must necessarily be comprised within the DCO application ... in order for development consent to be granted."
Source: SAV, paras 1.11, 4.8-4.9, pp.7, 16-17; HENPS, para 5.129, p.86.

Backstop dates for meeting the public transport mode share targets (50% at 116 million passengers per annum, rising to 55% at 130 million) are not fixed in either document – they are to be "proposed" by the applicant and "defined during the development consent order process," after the point at which this NPS would already have been designated.
Source: SAV, para 2.1, p.8.

Freight mitigation measures (consolidation, booking systems, off-peak retiming, dedicated HGV parking) are framed throughout as things promoters "could" consider, with no mandatory language anywhere in the supporting evidence.
Source: SAV, para 4.29, pp.20-21.

On noise, mitigation effectiveness is stated by the Government's own Appraisal of Sustainability to depend on "factors outside the control of the airport or the policy itself, including technological change, behavioural change and the actions of other organisations" – meaning delivery of promised mitigation is not guaranteed by this policy, a point the AoS itself summarises as "even with mitigation in place, significant adverse effects are expected to remain."
Source: AoS, p.9, NTS6.

For these reasons we do not consider the mitigation package, taken as a whole, to meet a reasonable standard of deliverability, and note that its effectiveness cannot be properly assessed at this stage because so much of it remains undefined.

Night flights

Q18. Do you agree or disagree that the proposed ban on scheduled night flights for Heathrow following expansion should be defined based on the time a 'plane takes off or lands' instead of 'departure from and arrival to terminal'?

Don't know

Night flight criteria reasoning

Q19. Explain your answer.

LADACAN supports defining the night period by reference to the time passengers occupy the aircraft and it is on the runway (take-off/landing), not scheduled departure/arrival times, in order to capture the actual noise-generating event rather than an administrative scheduling time that could be manipulated to move genuine night noise outside the protected window.

We are, however, very concerned about the underlying substance of the proposed night flight ban itself, independent of how it is defined. The applicant is required to put forward “a ban on scheduled night flights for a period of six and a half hours ... between the hours of 11pm and 7am” – 6.5 hours out of a possible 8-hour window, with the drafting allowing off-schedule flights to operate within the ban period under rules that are still to be defined.

Source: HENPS, para 5.47, p.67.

LADACAN's position is that the ban should cover the full 8-hour period (11pm-7am), that the definition used should prevent the 1.5-hour gap and the 'off-schedule' carve-out from eroding genuine night-time protection, and that the rules governing off-schedule flights should be settled and consulted on before any revised NPS is designated, not left open.

Designation

Q20. To what extent do you agree or disagree with the proposed designation of Heathrow expansion as defined in the draft HENPS as CNGI?

Strongly disagree

CNGI reasoning

Q21. Explain your answer.

CNGI designation would add substantial additional weight to the case for expansion in the planning balance ahead of, not after, the underlying evidence base being settled.

As set out above, DfT's own evidence shows the economic case is uncertain and modest (0.052% GDP uplift, negative NPV in every scenario), the noise case rests on flight paths that do not yet exist, and the climate case depends on SAF and carbon-removal assumptions not yet proven at scale. Designating the scheme as Critical National Growth Infrastructure at this stage would, in our view, pre-judge the outcome of assessments which the Government's own documents acknowledge are still provisional, indicative, or deferred to later stages.

Compensation

Q22. To what extent do you agree or disagree that the compensation for affected residents is fair?

Strongly disagree

Compensation

Q23. Explain your answer.

The scale of displacement is substantial and the Government's own evidence acknowledges that compensation cannot fully offset the harm caused.

780 homes are subject to compulsory purchase and approximately 1,841 residents face permanent relocation. Construction-phase effects on housing and community identity are rated major adverse (significant) in the Government's own Health Impact Analysis.

Source: HIA, §1.4.8, §1.4.17, §1.4.90.

The same document states directly that mitigation measures for displaced or affected communities "would be unlikely to fully offset the loss of established communities, social networks, and sense of place" – an acknowledgement from the Government's own health assessment that compensation, however calculated, cannot make affected residents whole.

Source: HIA, §1.4.89, §1.4.93.

We also note that the compensation and mitigation framework focuses primarily on those directly displaced by the scheme boundary, while hundreds of thousands of households facing increased noise exposure (359,700 daytime, 305,400 night-time) receive no equivalent compensation for the reduction in quality of life and the loss of existing noise respite that the Government itself acknowledges will occur. We consider the compensation package, as currently framed, to be wholly inadequate since it is proportionate only to physical displacement, not to the wider harms the scheme's own evidence identifies.

Surface access

Q24. To what extent do you agree or disagree with the:

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
requirements for surface access				X		
the Surface Access Vision document					X	
Explain your answer. The mode share targets are a step in the right direction but leave a very large absolute increase in car-based trips unaddressed, and key delivery mechanisms remain unfunded and uncommitted. Heathrow already achieves a 42% public transport mode share, and the targets set out (50% at 116 million passengers per annum, 55% at 130 million) represent only a modest improvement against a backdrop of 65 million additional passenger journeys per year and total passenger numbers projected to reach 150 million per annum by the mid-2050s. Neither the draft HENPS nor the Strategic Vision document translates this percentage target into an absolute number of car journeys – the more meaningful figure for assessing real-world road network and environmental impact – which we consider a significant gap. Source: SAV, paras 2.1, 2.7, 4.3, pp.8, 10, 15. The Government's own Strategic Vision document concedes that "there is already significant congestion on the road network around Heathrow and, even without expansion, this could worsen in future due to wider development in the area" – undermining any framing that road impacts are solely an expansion-specific issue with a clean mitigation pathway. The same document states that if mode share targets are not met, there is "a substantial risk of additional congestion from the expanded airport." Such congestion comes at significant cost to other road-users and businesses. Source: SAV, para 4.19, p.18. The draft HENPS itself confirms "significant impacts on the M25 and the wider strategic and local road network" are expected during both construction and operation, naming the A4 and A3044 as specifically affected, alongside the works required to move and tunnel a section of the M25 itself. Source: HENPS, para 5.121, p.84; SAV, para 4.19, p.18. Delivery of the rail links that the mode share targets ultimately depend on is not secured: two indicative options (Western and Southern links) are floated without confirmed promoters, or funding sources, or delivery commitments, and the Government requires only a "credible plan" before the 130 million passenger threshold is reached – not a delivered scheme, and not as part of the DCO application itself. Source: SAV, paras 4.8-4.9, pp.16-17; HENPS, para 5.129, p.86.						

Q25. What, if any, further comments do you have on surface access?

The surrounding road network is owned by five separate local authorities, which we consider a material coordination risk for delivering consistent mitigation across the affected area.
 Source: SAV, para 4.23, p.19.

Making best use

Q26. To what extent do you agree or disagree that the 'Making Best Use' policy should be updated?

Strongly agree

Agree with updating Making Best Use policy

Q28. Explain your answer.

We agree that Making Best Use should be updated – but in the direction of actively prioritising demand management and better use of existing capacity across the UK's airport system, and not simply updated to accommodate further expansion.

As set out under Question 1, the Government's own forecasts show that UK-wide passenger growth is not contingent on a Heathrow third runway specifically: national totals are materially unchanged whether growth is concentrated in the South East or redistributed regionally, and substantial passenger growth (292 million to 487 million by 2055) is already accommodated by previously approved expansions at Luton, Stansted, London City and Gatwick without a new Heathrow runway.

Source: HEAR, paras 2.4, 2.8, pp.11-13, Table 3-5, p.20; AVF, Table 6-4, para 6.10, pp.83-84.

Q29. What, if anything, would you like to be considered in any update to the 'Making Best Use' policy?

Making Best Use should be revised to make explicit that meeting future demand through better utilisation of existing runway capacity across the London and regional airport system – supported by demand-management tools such as a frequent flyer levy – is the Government's preferred approach, and that new capacity should only be considered once that approach has been fully tested and found insufficient. We do not see evidence showing that test has been met.

Framework

Q30. To what extent do you agree or disagree that the draft HENPS provides an effective framework for decision making on development consent applications?

Strongly disagree

Framework reasoning

Q31. Explain your answer.

The decision-making framework sets its tests at 'no new breach' or 'no material impact' rather than 'no harm', and – most significantly – asks decision-makers to rely on a noise and efficiency case built on an airspace design that does not yet exist and is explicitly excluded from the process the HENPS governs.

Across air quality, noise and carbon, the Government's own decision tests are calibrated to allow deterioration provided it does not cross a defined threshold: air quality is tested against "no new breach" of legal limits; noise against avoiding "significant adverse impacts" relative to 2024, not zero increase; and the scheme's own carbon emissions are not, in themselves, a reason to refuse consent unless they threaten the UK's economy-wide carbon budgets. We consider this materially weaker than the impression the four-tests framing is likely to give the public.

Source: HENPS, paras 5.25-5.26, 5.55, 5.88, pp.61, 68, 78.

The airspace modernisation gap

This is the most significant structural weakness in the decision-making framework, and one that does not appear to have been substantively addressed anywhere in the consultation evidence base.

The UK has moved away from the airport-by-airport Future Airspace Strategy Implementation (FASI) approach toward a nationally coordinated UK Airspace Design Service (UKADS), established because individual airports' airspace requirements can conflict and this needs to be resolved through a single, cross-airport design process rather than airport-by-airport. The Government's own stated purpose for this reform is to make UK airspace "more efficient, resilient, quieter and cleaner."

Yet the draft HENPS confirms that the airspace design a Northwest Runway scheme would require has not yet been produced. The noise assessment underpinning the HENPS uses "indicative" flight path designs inherited from the 2015 Airports Commission, because "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)." DfT goes on to acknowledge directly that the eventual applicant's noise assessment "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."

Source: HENPS, paras 5.38, 5.41, pp.64, 66.

The draft HENPS is explicit that airspace change itself sits entirely outside the process it governs: "Additional consultations on issues such as airspace change, overseen by the Civil Aviation Authority, will take place outside of the planning process."

Source: HENPS, para 5.358, p.130.

Nowhere in the draft HENPS is there any assessment – qualitative or quantitative – of how a third runway's additional traffic and required flight paths would affect the airspace available to other London-area or regional airports. A review of the document found no mentions of "FASI," or of "Continuous Climb Operations" or "Continuous Descent Operations", and no discussion of how Heathrow's airspace requirements would conflict with those of regional airports. Luton Airport is mentioned only once, as one of several airports that have received planning consent to increase capacity, with no airspace dimension discussed.

Airspace redesign is a key concern both to Luton Airport's operator and to LADACAN's members. Luton and other regional airports in the London Terminal Manoeuvring Area depend on the same airspace that Heathrow's third runway would require substantial reconfiguration to accommodate. If Heathrow's own airspace requirements absorb the available capacity for conflict-free routing in the design UKADS ultimately produces, the efficiency penalty may fall on other airports' operations – for example, preventing Luton flights from achieving Continuous Climb or Continuous Descent profiles, which are themselves an important source of noise and carbon reduction. Luton Airport's much-complained-about westerly departures are often held low at 5,000ft for 20 miles or more, increasing both noise levels and emissions. None of this is assessed, quantified, or even acknowledged as a risk anywhere in the HENPS evidence base.

This is a serious sequencing problem: the Government is asking for the HENPS to be designated, and Critical National Growth Infrastructure status to be conferred, on the strength of a noise, climate and efficiency case that DfT's own text says may not survive the airspace design process that has not yet happened – a process deliberately placed outside the scope of this NPS and any subsequent DCO examination. We do not see how the Secretary of State can be satisfied that the noise test in particular has been met when the flight paths on which that test rests are acknowledged to be provisional and potentially superseded.

The HENPS should not be designated until the UKADS redesign of London airspace – including cross-airport effects on regional airports such as Luton – has progressed sufficiently for its implications for Heathrow's noise, climate and efficiency case to be properly assessed and consulted on, rather than deferred to a process with no defined role in the DCO decision.

Supporting documents

Q32. What, if any, comments do you have on the:

Appraisal of Sustainability (AoS)

The AoS's own headline conclusion, comparing the two shortlisted schemes, is that "neither scheme clearly avoids significant adverse effects" – the Government's preferred scheme (HAL) was selected as "the most credible and deliverable option," a deliverability judgement, not a sustainability one. Source: AoS, p.6, NTS4-5. Most significantly, we consider the scope of the AoS's 'reasonable alternatives' test to be inadequate. Only two pro-expansion schemes (HAL and Arora/HWL) were compared; demand management or no-new-capacity approaches were excluded from consideration from the outset because "the policy context established in 2018" had concluded that Heathrow expansion is needed. The appraisal never tests a reasonable alternative – better use of existing capacity and active demand management – against the expansion options, and therefore cannot properly conclude that expansion is the most sustainable path forward. Source: AoS, p.5, NTS3. We also note that the baseline used throughout the AoS is "no-expansion, two runways continuing as now," rather than a "two runways with active demand management" baseline – a choice that, in our view, favours expansion by declining to credit a managed-demand counterfactual with any of its own environmental or social benefits. Source: AoS, p.5, NTS4.

Habitats Regulations Assessment (HRA)

-

Equalities Impact Assessment (EqIA)

-

Health Impact Analysis (HIA)

We welcome the HIA's frankness. Its cumulative effects assessment finds 12 of the 14 health determinants to be adverse at a policy level. Only employment/income and education/skills/training are assessed as beneficial. This scorecard from the Government's own evidence militates strongly against the proposed scheme. Source: HIA, §1.5.4. We note the HIA is explicitly non-statutory ("there is no statutory requirement for HIA or HIA"), is undertaken at a strategic, high level only, and "inherits the assumptions and limitations of DfT's own Appraisal of Sustainability and other technical studies" rather than independently verifying them. Detailed distributional economic assessment – including of the jobs figures relied on elsewhere in the consultation package – is explicitly deferred to a future business case stage, meaning the jobs case underpinning the NPS has not itself been fully economically evidenced for this consultation. Source: HIA, §1.2.1, §1.3.8, §1.4.105.

Public Sector Equality Duty

Q33. Do you agree or disagree that the draft HENPS takes due regard for its legal obligations under the PSED?

Disagree

PSED reasoning

Q34. Explain your reasoning.

We are not satisfied that it has been adequately addressed, based on the limited detail available in the consultation package.

The draft HENPS's own summary of the Equality Impact Assessment notes that positive impacts "primarily relate to employment, skills and connectivity," while negative impacts include "loss and relocation of homes, employment and community facilities" – i.e. the same communities bearing the construction and displacement burden also lose some of the local jobs that are cited as a benefit elsewhere in the consultation package, without those two effects being reconciled against each other. Source: HENPS, para 1.35, p.13.

As this response is based on the HENPS's own summary of the EqIA rather than a full review of the EqIA itself, we would ask the Department to confirm what quantitative or qualitative assessment has been made of the distribution of these positive and negative equality impacts across protected characteristic groups within the affected communities, and to make that assessment more prominent and accessible within the consultation package.

Final comments

Q35. What, if any, additional comments do you have on the draft HENPS?

We would draw the Department's attention to the following points, which do not fit neatly under the questions above but which we consider material to the consultation.

The airspace modernisation sequencing problem (see also Question 9)

We consider this a significant gap in the consultation evidence base, and repeat our summary here for completeness. The HENPS asks the Secretary of State, and consultees, to accept a noise case and an efficiency/climate case built on flight paths that do not yet exist, using a national airspace redesign process (UKADS) that the HENPS explicitly places outside its own scope and outside the DCO examination process that will follow it. No assessment is offered anywhere in the document of the effect of Heathrow's airspace requirements on other airports, including regional airports such as Luton, whose ability to achieve Continuous Climb and Continuous Descent operations depends on adequate access to the same shared, finite airspace. We ask the Department to explain how the noise and climate/efficiency tests can be considered met when their underlying evidential basis is acknowledged to be provisional and likely to change.

Internal inconsistencies that should be resolved before designation

We have identified an apparent discrepancy between the CGE report's Executive Summary NPV figure ("around £22 billion") and its own Table 1 figure (£14,521.8m) for the same core scenario. We would ask the Department to clarify which figure is correct, and to confirm which has informed the headline benefit claims made elsewhere in the consultation package.

Source: CGE, p.5 (Table 1) vs p.26 (Executive Summary text).

The economic case rests on an 11-year-old, non-re-modelled cost-of-not-expanding estimate

The £21bn-£45bn cost-of-not-expanding figure cited in the HENPS can be traced back to the Airports Commission's 2015 analysis and has not been independently re-derived. DfT states the broad conclusions are "accepted" while acknowledging precise 2026 figures "would now differ." Given how much has changed in aviation demand, climate policy and the wider economy since 2015, we do not consider it appropriate to rely on this figure without updated modelling.

Source: HENPS, para 2.28, p.22.

On sustainable aviation fuel and the wider net zero framing

We would reiterate, drawing together evidence cited under Question 2 above, that 'Sustainable' Aviation Fuel – repeatedly presented across the consultation package as a central pillar of the climate mitigation strategy – is both too costly (roughly 2.5 to 3 times the price of kerosene, with the gap not expected to close) and insufficiently available (capped at 17% of the fuel mix by 2040 in the Government's own central case) to make a material difference to the sector's emissions trajectory within a timeframe that matters for the UK's 2050 net zero commitment. No credible net zero pathway for aviation has been evidenced, as our comments above have made clear.

LADACAN's alternative

We would ask the Department to give proper consideration, in any revised HENPS, to an explicit alternative pathway: no new runway capacity at Heathrow, better use of existing capacity across the UK's airport system (supported by an updated Making Best Use policy), and active management of demand growth – for example through a frequent flyer levy – rather than continued capacity expansion. We do not consider this alternative to have been seriously tested anywhere in the consultation evidence base, including in the Appraisal of Sustainability 'reasonable alternatives' assessment (see Question 10), and we ask that it be properly assessed before any further steps are taken toward designation.