



SASIG

Strategic Aviation Special Interest Group

Draft Heathrow Expansion National Policy Statement

A briefing pack for West London Boroughs, Home Counties districts, TfL and UKACCs

MEETING

SASIG / HSPG local authority meeting
Teams · 8 July 2026, 10:00

DFT CONSULTATION CLOSES

23:59 on 1 September 2026
Transport Committee evidence: 23 July 2026

STATUS OF THIS PACK

Background to support discussion
Not a consultation response

Introduced by **Keith Artus (SASIG)** and **Michael Thornton (HSPG)**

Presentation prepared by SASIG Secretariat with additional analysis and commentary from Northpoint Aviation. Figures are as reported in the Government's own documents.

Purpose: read the evidence actively — and challenge it

Our job today is not to accept the Government's case, but to decide how to respond to it. Read every document through four lenses:

1

What IS in the documents

The core draft HENPS and its supporting evidence — need case, four tests, impacts.

2

What DfT is ASKING

Consultation questions are broad-brush and discursive — designed for open comment, not tight answers.

3

What is NOT covered

Omissions and superficial treatment — the LA financial/administrative burden above all.

4

What the HENPS no longer does

The 2018 ANPS held the South-East system together; the 2026 HENPS narrows to Heathrow only.

THE MEETING SCOPE and ARC

1 · Policy process

2 · Need case

3 · Assessment principles

4 · Impacts evidence

Next steps & timetable

The consultation questions



NB SASIG Experience Suggests: The strongest consultation response pair concerns with specific asks and wording — ideally with supporting evidence

For each issue, the aim should be to determine: (a) what should the final HENPS require of the applicant? (b) What must be funded? (c) Who monitors it? (d) What triggers enforcement? (e) How are communities engaged?

In SASIG's view local authorities should avoid being left to address/resource Heathrow's residual and unacknowledged scheme impacts that arise from their statutory obligations, while the Government relies on growth presumptions and seeks to capture their benefits at a national and regional level to justify its support without contributing to scheme delivery or mitigation

How did we get here? Aviation policy since 2013

The HENPS sits on top of a long, uneven policy history. The one comprehensive strategy — Aviation 2050 — was consulted on but never finalised (COVID). Ever since, policy has been assembled piecemeal.

2013

Aviation Policy Framework replaces the 2003 White Paper — still the residual baseline.

2012–15

Airports Commission (Davies) recommends a Heathrow North-West Runway.

Jun 2018

Airports NPS (ANPS) designated + Making Best Use (MBU) for other airports.

Dec 2018

Aviation 2050 Green Paper — the full strategy, consulted on but never completed.

2020

COVID halts the strategy; Supreme Court confirms the ANPS stands.

2022–24

Flightpath to the Future · Jet Zero · noise, airspace & slot policy — piecemeal.

Jan 2025

Government backs a third runway; Planning & Infrastructure Act reforms NPS review.

Nov 2025

HAL North-West Runway selected to inform the review.

Jun 2026

Draft HENPS published (18 June). Consultation closes 1 September 2026.

Commentary: *Because there is no finalised national strategy, Heathrow expansion is being decided against a backdrop of fragmented, ageing policy — not an up to date integrated framework.*

A Heathrow-only NPS leaves the rest of aviation policy fragmented

Matters once held together by the ANPS / Davies framework now sit in a patchwork: the 2013 APF, 2018 MBU, local planning, the Planning Act case-by-case regime, Jet Zero and airspace / noise policy. Spatial coverage now looks like this:

Spatial category	Main policy coverage now	Practical implication
(A) Heathrow	HENPS (+ National Networks NPS for road/rail)	Strongest, clearest framework — site-specific need case, four tests, CNGI
(A) Northolt	Not in HENPS — APF, MBU by analogy, MoD estate, CAA, local planning	Ambiguous — must not become a 'back-door' part of Heathrow policy
(B) London system Gatwick · Stansted · Luton · City · Southend	MBU (existing runways) + APF + local / Planning Act	Growth supported, but no airport-specific NPS; new runways weakly covered
(C) Non-London South East Farnborough · Biggin Hill · Southampton · Manston	MBU + APF + local plans + Planning Act	Case-by-case; no strategic need case for relieving London pressure or freight
(D) Regional airports & aviation policy	APF + MBU + Flightpath + Jet Zero + local/devolved planning	Broad support, but no integrated national spatial framework



IMPORTANT CONSIDERATION: There is no updated overarching policy framework or spatial aviation strategy against which to evaluate the draft NPS

Nothing explains how Heathrow expansion interacts with consented or potential growth at other airports.

Key question must be, therefore, should Government update MBU and/or publish a wider aviation strategy before, or alongside, designation — so Heathrow is not considered in isolation?

Planning Act changes — and why the Government is promoting a new NPS



What the Planning & Infrastructure Act 2025 changed

- NPSs must be reviewed at least every five years.
- A new 'reflective amendment' route for changes that reflect published policy, legislation, referenced documents or court decisions.
- Government treats the HENPS as an amendment to the ANPS — not a wholly new policy exercise.
- Statutory NSIP pre-application consultation requirement has been removed.



Why a National Policy Statement matters

- An NPS establishes the need for nationally significant infrastructure and the framework for assessing a DCO.
- Under s.104, the Secretary of State must decide a DCO in accordance with it, unless a statutory exception applies.
- Designation gives Heathrow expansion a strong policy foundation: the DCO debate shifts from whether capacity is needed to whether the scheme complies and impacts are mitigated.



QUESTION: Is this a 'reflective' amendment — or a substantive narrowing?

The change from an Airports NPS with 'important and relevant' status for other London/South East airport infrastructure to a Heathrow-only HENPS is not merely drafting. It changes the practical policy architecture for non-Heathrow proposals and for assessing South East system effects. Attendees may wish to consider testing whether a reflective amendment is the right route for a change of this significance.

ANPS → HENPS: what was in the 2018 NPS that is no longer in the 2026 version

Based on the Davies Commission's recommendations the 2018 ANPS was primarily about a potential Northwest runway at Heathrow — **but** it also set a South-East capacity need and was 'important and relevant' to other airports. The draft HENPS strips that wider context out and does not attempt to assess or understand the potential consequences of that approach

Issue	2018 ANPS	Draft HENPS	Significance to LA Stakeholders
Geographic framing	New runway capacity across the South East; Heathrow NWR preferred, but wider relevance	Heathrow expansion only; other airports directed to MBU	<i>Cannot use one NPS to assess South East system effects</i>
Other-airport applications	Contents 'important & relevant' for other London / SE airport infrastructure	No direct effect outside Heathrow	<i>Uncertainty over cumulative London/SE impacts</i>
Strategic alternatives	Heathrow NWR vs Extended Northern Runway vs Gatwick second runway	Alternatives chapter removed; HAL NWR vs Heathrow West only	<i>The location is imposed, not reopened with a blank sheet</i>
Need case	South East runway-capacity need; Heathrow as preferred location	Heathrow hub, freight, resilience & 'growth across the country'	<i>Local effects weighed against a stronger national interest and a Heathrow-specific case, not system based alternatives</i>
Scheme description	NWR + associated terminal capacity	Broader terminal reconfiguration, modernisation & phasing	<i>Phased impacts over a long construction/transition period – slow release of capacity, not all at once</i>



CHALLENGE The loss of a system-wide analysis means the assessment of the NWR proposals are based solely on core local rather than sub-regional or regional impacts

An integrated South-East capacity framework and the ANPS's 'important & relevant' status for other airports. Non-Heathrow capacity questions now fall to a patchwork of the 2013 APF, MBU, local plans, other NPSs and case-by-case DCO / planning decisions.

From HENPS to DCO: three tracks to resource in parallel

The HENPS does not grant consent. HAL must promote one or more DCO applications for a complete North-West Runway scheme (runway + terminal capacity + supporting infrastructure). Phasing is allowed only with a coherent, deliverable pathway — not a runway or terminal in isolation.

**Now**

1 · Policy consultation

The draft HENPS consultation and Parliamentary scrutiny. Shape the policy text before designation.

**Later**

2 · DCO examination

Environmental statement, draft requirements, obligations, compulsory acquisition, construction & surface-access strategies, Local Impact Reports.

**Separate**

3 · Airspace change

Overseen by the CAA, outside the planning process — flight-path consequences may not be known at the DCO decision.

Transitional rule. The 2018 ANPS applies to any DCO accepted for examination before designation; the HENPS applies to applications accepted after final publication.



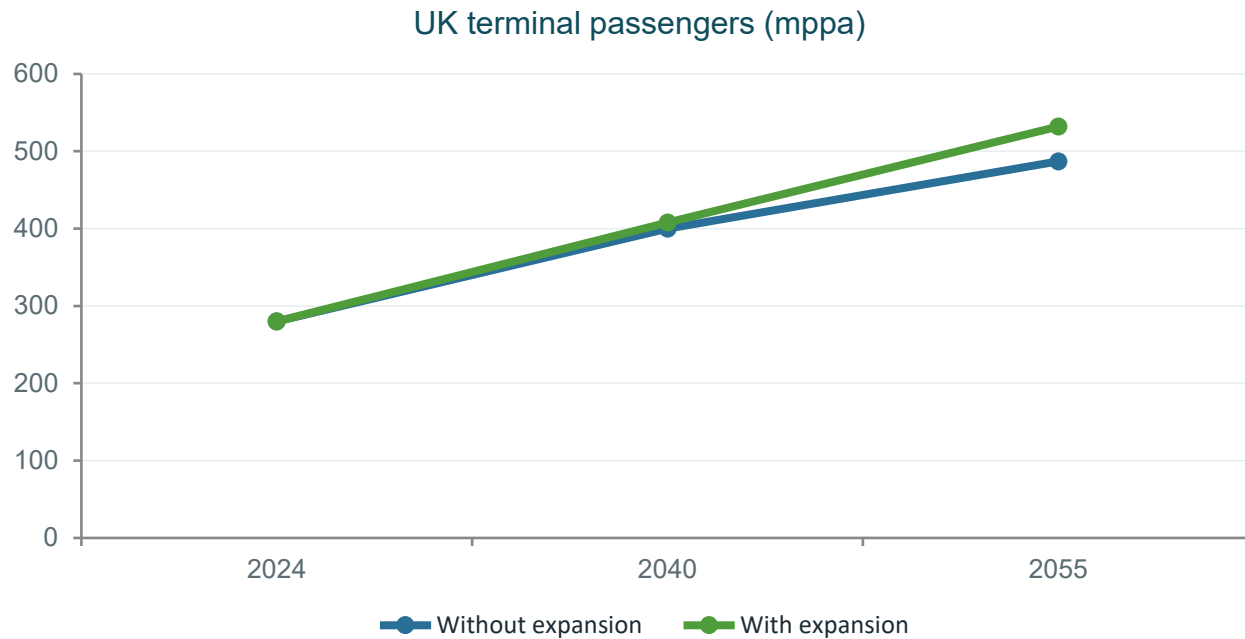
IMPORTANT ISSUE: Engagement at risk

Statutory NSIP pre-application consultation has been removed. Authorities should seek enforceable engagement standards, funded participation and a clear role for CISHA, HSPG, SASIG and local forums.



The need case: forecast demand & system capacity

DfT26 forecasts a much higher baseline than the 2017 forecasts used for the 2018 ANPS — largely because of consented growth at other airports. Expansion adds relatively little at UK level until the 2050s.



302 m

UK terminal passengers in 2025 (above the 2017 forecast of 292.5 m)

~487 mppa

Forecast by 2055 WITHOUT Heathrow expansion

+~45 mppa

Added by 2055 WITH expansion (DfT26 central case)

Two variants — 'no pass-through' vs 'cost pass-through' of charges — bracket the range

407 mppa

CCC view of maximum demand permissible to achieve Net Zero



CHALLENGE 'No expansion' is excluded as a reasonable alternative

Because need is treated as settled, and consideration of whether forecast demand could be better addressed on a system-wide basis without NWR at LHR, the appraisal never tests a do-minimum or demand-management case as a genuine option — only as the baseline it compares against. Members may wish to ask whether the consultation gives a fair opportunity to question the need case itself. (HEAR §2–3; AoS §2.2, §5.2)

Why the forecast has changed: DfT have rebuilt their forecasting model

DfT26 is not a re-run of the 2017 numbers. The model is re-based to 2024 and re-specified in ways that lift passengers, lower movements and shrink the regional displacement (clawback and overspill from London & the Southeast seen in 2017 — the outputs must be read in that light).

Change	DfT17 (2018 ANPS)	DfT26 (draft HENPS)	Why it matters for the need case
Base year	Pre-COVID 2016/17 evidence base	2024 CAA base; COVID recovery override removed	Reflects the post-COVID network, lower business share and larger aircraft
Demand–GDP link	Earlier income/price elasticities	Elasticities re-estimated & published; updated OBR/OECD/IMF inputs	Changes the scale, timing and GDP-sensitivity of demand, which is also now forecast out a further ten years
Fares, fuel & carbon	No SAF mandate; undifferentiated carbon	SAF costs + differentiated UK ETS / CORSIA prices in fares	Carbon now suppresses demand directly (high-carbon case ~-16%)
Airport capacity	Older capacity; different Heathrow release	Consented growth at Gatwick, Luton, Stansted & City in the baseline	Key reason DfT26 finds far less London & Southeast regional displacement (see above)



CRITICAL FACTOR: A refreshed model — but the capacity assumptions are decisive

Because consented London capacity is now baked into the baseline, the incremental 'need' for Heathrow is measured against a system already assumed to grow. Members may ask whether regional-capacity alternatives were tested as rigorously as the consented London schemes that shrink the displacement effect.

Back-loaded: the runway opens in 2035 capacity arrives in the 2050s

In DfT17 the expansion filled quickly after opening. In DfT26/HEAR the runway is operational in 2035 but passenger capacity is released in terminal steps — so most of the connectivity uplift falls late in the 60-year appraisal.

The consequence — impacts arrive before benefits

- Carbon, noise, land take, compulsory purchase and construction disruption are front-loaded from the 2030s.
- The passenger, connectivity and freight benefits are concentrated in the late 2040s and 2050s.
- Any slippage in the 2038, 2049 or 2054 terminal phases further weakens an already negative appraisal.

 **2035·38·49·54** Runway operational 2035; terminal capacity then released in steps in 2038, 2049 and 2054

 **+5 → +45 mppa** Extra UK passengers from expansion: +5m by 2040 rising to +45m by 2055

 **+16k → +217k** Extra UK air transport movements: +16,000 by 2040 rising to +217,000 by 2055

 **≥ 260,000** Runway designed to enable at least 260,000 extra movements a year — realised only late in the period



CHALLENGE Timing is now central to the case

Members may ask whether it is reasonable to designate on the strength of benefits two to three decades away, while the environmental and community costs begin almost immediately — and whether the HENPS should require the benefit case to be re-tested at each terminal phase.



Hub role, connectivity & freight — where the case really sits

The distinctive part of the need case is not near-term passenger volume — it is protecting international transfer (interlining) traffic, which mainly benefits airline network economics and Heathrow's hub role.

International-to-international interliners (mppa)

	2024	2040	2055
Without expansion	22	20	4
Additional, with expansion	–	+3	+15

Transfer traffic collapses to ~4 mppa by 2055 without expansion; expansion adds ~15 mppa. This is the core hub argument.



Freight — Heathrow 2024

1.6 Mt of cargo — 60% of UK airport freight by tonnage£216 bn of imports/exports
— 72% of UK airport freight by value95% carried in passenger bellyhold (vs freighter-led Stansted / East Midlands)



KEY ISSUES Two soft spots in the need case

- Growth 'across the country' is undercut: expansion mainly displaces activity within the London system — airports outside London are ~1% LOWER with expansion than without. The **benefit to the regions is access to Heathrow's connections, not regional traffic growth.**
- Freight is central to the narrative but there are **NO separate freight forecasts**. Bellyhold and dedicated-freighter markets are not distinguished, and displacement / substitution from other airports and surface-freight movements are not assessed.
- Heathrow handled 73% of UK long-haul flights and 72% of UK air freight by value in 2024 — but **additional ATMs and passengers are limited until the 2050s.**

London vs the regions: displacement has moved inside the M25

The 2017 evidence implied expansion would pull demand from the rest of the UK into London. The 2026 evidence says the effect is now mainly displacement within the London system — a pivotal finding for regional-airport and SASIG arguments.

Terminal passengers (mppa)	2024	2040	2045	2050	2055
DfT17 · London — no expansion	175	199	202	205	—
DfT17 · London — with expansion	175	241	245	248	—
DfT17 · Rest of UK — no expansion	113	160	184	204	—
DfT17 · Rest of UK — with expansion	113	146	168	187	—
DfT26 · London — no expansion	179	245	263	269	270
DfT26 · London — with expansion	179	251	272	295	318
DfT26 · Rest of UK — no expansion	113	158	179	205	217
DfT26 · Rest of UK — with expansion	113	158	176	195	214

Under DfT26, Rest-of-UK airports are only ~1% lower with expansion by 2055 — while still growing ~90% from 2024. In DfT17 the regional loss was far larger (Rest of UK ~146m with expansion vs ~160m without in 2040).



KEY FINDING Less displacement — but not a regional growth case

The smaller displacement helps rebut the 'Heathrow drains the regions' concern, but the London system still captures the overwhelming majority of the absolute uplift and virtually all long-haul growth. Members may press whether the appraisal gives fair weight to direct regional growth, resilience and domestic connectivity — not just access to Heathrow.

Alternatives — is a Heathrow third runway really the only answer?

Jan 2025 Support in principle for a 3rd runway

2025 7 promoter proposals received

Shortlist 2 schemes taken forward

25 Nov 2025 HAL North-West Runway selected

This was a Heathrow promoter comparison to inform the review — NOT a fresh run of strategic options. The AoS appraises only two 'reasonable alternatives', both at Heathrow with similar capacity:

Option	Status in the AoS	Note
HAL North-West Runway	Selected scheme	3.5 km; ~756k ATM; ~£49 bn; loses Harmondsworth, Longford & Sipson (~756 homes)
Arora / Heathrow West	Reasonable alternative	2.8 km; ~769k ATM; ~£23.9 bn; greater displacement (~858 homes); also affects Harlington
No expansion	<i>Not a reasonable alternative</i>	Excluded because need is treated as established; used only as the appraisal baseline
Capacity without a new runway	<i>Ruled out</i>	~540k ATM achievable vs ~755–770k with a third runway
24-hour operation	<i>Ruled out</i>	Would breach night-noise protections



CONSIDERATION Is this a fair test of alternatives?

In practice the consultation offers a choice between two very similar Heathrow schemes, against a baseline that is not treated as a genuine option, with the 2018 location decision not revisited. And the '—' sustainability scores are pre-mitigation, while the economic and surface-access benefits assume the promoter delivers mitigation and mode-share targets through the DCO. The risk of non-delivery falls on communities and authorities.

Assessment principles: CNGI and the four tests

THE FOUR TESTS



Economic growth
across the country



Climate change
carbon budgets



Air quality
no new / worse breaches



Noise
envelope & respite



Critical National Growth Infrastructure (CNGI)

Once the applicant identifies negative impacts, applies the mitigation hierarchy and meets the four tests, a **presumption in favour of consent** applies, and it is unlikely consent will be refused on residual impacts. CNGI does not override legal requirements and does not create an additional need case. Exceptional circumstances — unacceptable risk to human health, public safety, defence, irreplaceable habitats or flood risk — may still outweigh it. *Note: CNGI (a planning concept) is NOT the security concept 'Critical National Infrastructure'.*



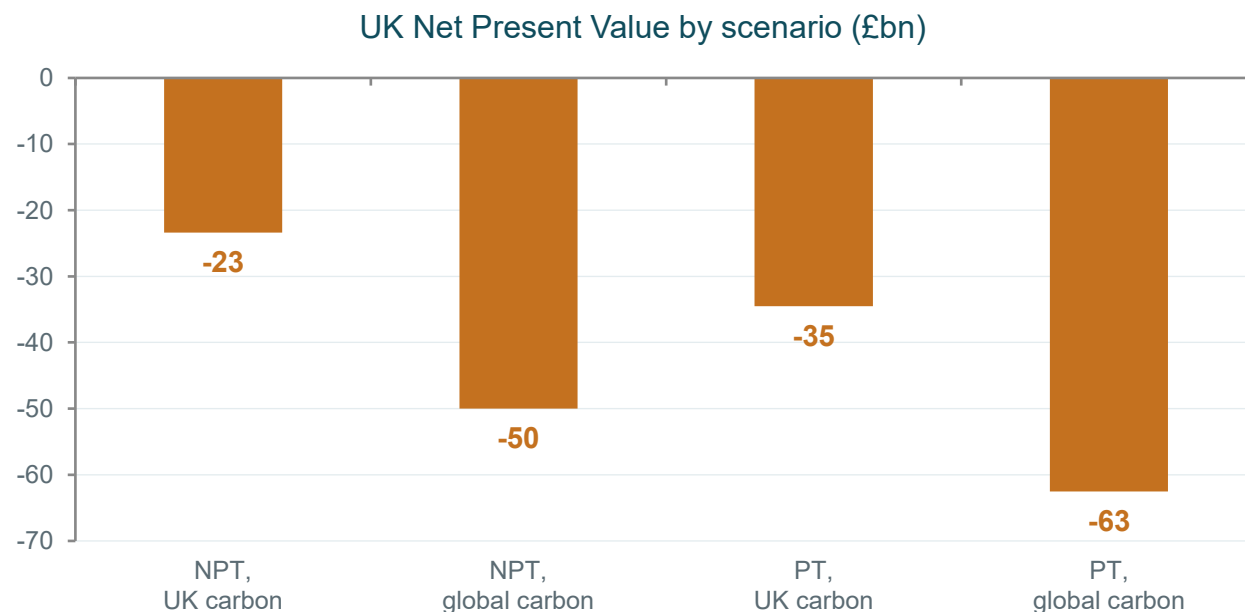
EFFECT OF CNGI: creates a strong policy tilt once the four tests are judged met

So local authorities must ensure the tests themselves are properly defined, locally meaningful, measurable, enforceable and resourced — the whole planning balance can turn on them.

- The policy should not let national aggregate benefits, or 'overall' noise metrics, override significant localised harm without robust mitigation or compensation.
- Ask: should CNGI be qualified so residual local health, community, housing, utility, flood, defence and resilience impacts cannot simply be discounted as ordinary residual impacts?
- 3b also engages cyber and Border Force (Home Office assets / Immigration Removal Centres) — continuity and neighbouring land-use impacts must be addressed.

The economic appraisal (HEAR): the Government's most striking finding

The HEAR is a 60-year, UK-only cost–benefit analysis in 2024 prices. When all monetised impacts are combined, the **Net Present Value is negative in EVERY scenario**.



–£23.4 to –£62.5 bn

NPV range — negative in every case

£35.5 / £25.3 bn

Passenger benefits (NPT / PT) — but much is a transfer, offset by –£23.5 bn of lost airline/airport profit

Carbon

Is the single largest disbenefit in the appraisal

+£2.6 bn GDP (~+0.05%)

Separate SCGE modelling by 2056 — concentrated in London (+0.19%); NOT additive to welfare; highly uncertain



REFLECTION The Government's own CBA does not support expansion on welfare grounds

The strategic case therefore rests on separate, uncertain GDP modelling and on non-monetised strategic arguments — not on the cost–benefit analysis. Members may wish to ask how a negative NPV, and a London-weighted GDP uplift, are reconciled with a 'growth across the country' test. Note too that major adverse environmental effects (biodiversity, water, heritage, landscape) are excluded from the CBA, so even this negative figure understates the full cost.

How the case deteriorated: Davies 2015 → DfT 2018 → HEAR 2026

The Government's own appraisal has moved from clearly positive to clearly negative across three iterations. The direction is not caused by weaker demand — the 2026 baseline is higher — but by how benefits and costs are now counted.

Measure (£bn PV)	Davies 2015 (NWR)	DfT 2018 (NWR)	HEAR 2026 (Current Trends)
Net Present Value	+£11.8bn (traded)	−£2.5bn to +£2.9bn	−£23.4bn to −£62.5bn
Passenger benefits	£54.8bn	£67.6bn	£35.5bn UK; £25.3bn if passed through
Environmental disbenefit	−£2.7 to −£3.0bn	−£1.9bn (+abatement)	−£34bn UK to ~−£60bn global
Airline / airport profit	−£38.4bn	−£55.0bn	−£23.5bn
Wider economy / GDP	£147bn/60yr narrative	£1.8–£3.1bn WEIs	£2.6bn/yr (0.05%), London-weighted

What drives the swing: aviation carbon is now monetised (the single largest disbenefit); benefits are counted UK-only, not all-passenger; capacity is released late; and business values of time have been cut (£54.98 → £43.84/hr, then further).



CRITICAL CONSIDERATION: The Government's own numbers no longer show a welfare gain

On the monetised cost–benefit analysis the scheme is negative in every 2026 central variant. The case now rests on separate, London-weighted GDP modelling and non-monetised strategic arguments. Members may ask how a negative NPV is reconciled with a 'growth across the country' test.

Financeability, carbon and the transparency gap

Two questions sit underneath the appraisal and are largely unanswered in the published evidence: can the scheme be financed without eroding its benefits, and is it compatible with net zero? Both fall heavily on local authorities and consumers.

Why it matters for LOCAL authorities

- **Charging and CAA price-control treatment** decide whether promised passenger benefits survive — and who bears any surface-access funding gap.
- **No published CAPEX** makes deliverability, optimism bias and public exposure hard to test for a privately financed scheme.
- **Carbon assumptions are optimistic** (SAF held at 17% from 2050); if they slip, the largest single disbenefit grows.

 **Not published** Full scheme CAPEX, aero / non-aero income-per-passenger split and final aerocharge path are all absent from HEAR

 **–£23 → –£35bn** UK-account NPV worsens once aerocharge costs are passed through to passengers (no pass-through → pass-through)

 **–£28.2bn** Even the optimistic Technology Development case (SAF 33% → 57%) stays negative on the UK carbon account

 **UK vs global** Net zero is defended only on the UK carbon account; on a global basis the carbon disbenefit reaches ~–£60bn



IMPORTANT CHALLENGE Press for the missing financial and carbon evidence

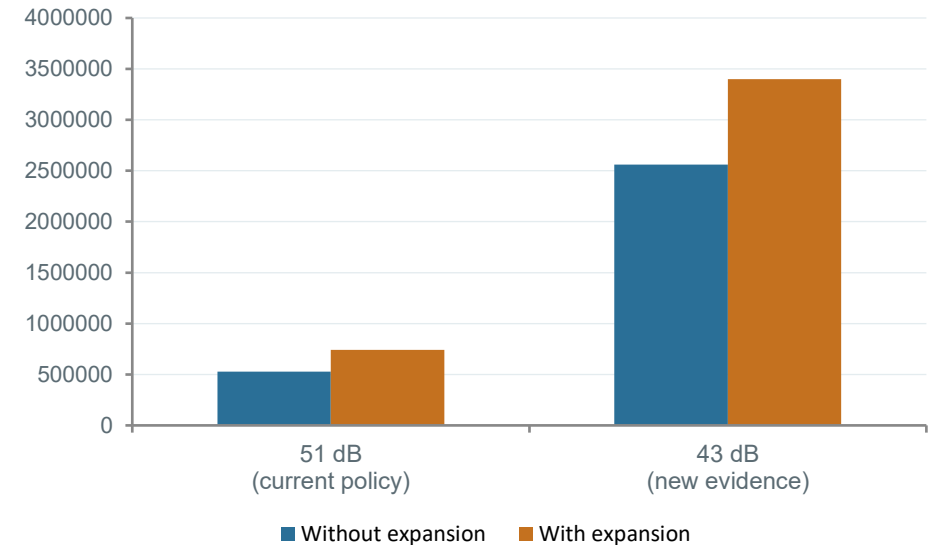
Members may want to demand publication of scheme CAPEX, the aeronautical / non-aeronautical income split and the aerocharge path before designation — together with a clear surface-access funding split and a net-zero test that addresses global as well as UK-account emissions.



Four-tests scorecard: climate, air quality & noise

Test	What the appraisal shows	Principal concerns
Climate	Aviation carbon now monetised — the largest single disbenefit. 185.6 MtCO ₂ e (UK account) rising to 244–366 Mt (global).	Relies on optimistic assumptions — e.g. sustainable aviation fuel held at just 17% from 2050.
Air quality	Monetised disbenefit ~£0.9 bn. Four AQMAs remain sensitive: Hillingdon, Hounslow, Spelthorne, South Bucks No.2.	NOT re-modelled since 2018 — scaled from the 2018 Addendum. PM_{2.5} & ultrafine particles only indicative.
Noise	Monetised ~£1.6 bn. At 51 dB, 741,600 people exposed WITH expansion vs 526,500 without in 2055 (~41% more).	New evidence (ANAS/ANNE/WHO) points to 43 dB — where ~3.4 m people are exposed. Night ban benefit 'partly illusory' (rescheduled to 06:00–07:00).

Daytime population exposed, 2055



At the 43 dB threshold the Government's own evidence supports, ~3.4 m people fall within the daytime adverse-effect contour with expansion.



CHALLENGE Assessed against thresholds the Government's own evidence indicates the NWR schemes fall outside its own criteria

Attendees may press for assessment and policy commitments at 43 dB BEFORE designation, not after; a contemporary air-quality re-assessment (including PM_{2.5} / ultrafine particles) rather than a scaled-2018 figure; and firm airspace-design and night-flight commitments — the 3R contours use the 2015 'Minimise Newly Affected' design, and communities cannot yet know who will be over-flown.



The noise test: what the HENPS actually requires

Alongside the scorecard, the draft HENPS sets out a specific two-limb noise test and the mitigations an applicant must deliver. This is the machinery local authorities will hold any Heathrow DCO to.

The test and the mandatory mitigations

- **Two-limb test:** limit and, where reasonably possible, reduce overall aircraft noise versus 2024 — and provide adequate, predictable respite.
- **Applicant must deliver:** a noise envelope with performance targets, a runway alternation scheme, and a scheduled night-flight ban of 6.5 hours (11pm–7am).
- **Enforcement is open:** who secures, monitors and enforces the measures is undefined — possibly the Secretary of State, local authorities and the CAA.



359,700

Households exposed to daytime noise (51 dB) in 2024, plus 305,400 at night (45 dB) — the highest of any UK or EU airport



≤ 2024

Government claim: overall noise held no greater than 2024 despite more flights — but the pattern shifts, some louder, some quieter



6.5 hours

Mandatory scheduled night-flight ban, 11pm–7am; the night-noise abatement objective is reviewed in 2027



2015 design

Noise modelled on the Airports Commission indicative flightpath; real airspace is UKADS's job (AND / ANG 2026 → CAP1616)



CRITICISM 'No greater than 2024' is an aggregate that can mask local harm

The mandatory night ban, envelope and alternation are welcome, but the headline holds only in aggregate, the modelling uses a 2015 indicative flightpath, and it is assessed against 51 / 45 dB thresholds the Government's own ANAS / ANNE evidence calls out of date. Members may press for local, contour-level limits and enforceable respite before designation — and clarity on who secures, monitors and enforces the measures.

Surface access, land take, place-making, compensation & utilities



Surface access

Mode-share $\geq 50\%$ at 116 mppa, $\geq 55\%$ at 130 mppa (vs $\sim 42\%$ today); $+ \sim 65$ m journeys/yr. Strategic Vision is explicitly NON-BINDING; rail need not be in the DCO (only a 'credible plan'); public-funding split undefined.



Land, property take & place-making implications

~ 756 homes by compulsory purchase; $\sim 1,219$ non-residential properties; loss of Harmondsworth, Longford & Sipson; major M25 realignment; $\sim 30,000$ extra parking spaces. Place-making must extend beyond the Order Limits.



Compensation

125% of market value in purchase zones; noise insulation; a community fund (£50 m/yr, £750 m over 15 yrs, referenced from Airports Commission). Eligibility, governance & duration need settling early.



Utilities & resilience

HENPS is comparatively weak: no single framework for electricity/grid, water, drainage, sewage, waste (Lakeside EfW removal), ICT/cyber, fuel & construction logistics. Home Office / Border Force asset continuity engaged but unconvincing and uncoded

KEY CONSIDERATION Benefits assume delivery through the DCO — but delivery is not guaranteed

The economic and surface-access benefits depend on the promoter delivering mitigation and mode-share targets through the DCO, while the sustainability scores are pre-mitigation. If targets are missed, the congestion, air-quality and community consequences fall on local authorities and their residents. Ask for binding delivery commitments, a clear funding split (DfT / TfL / GLA / National Highways / Network Rail-GBR / authorities), and rail delivery secured before 130 mppa.

The Government's assessment of impacts: the evidence suite

Six documents underpin the appraisal. Each should be read for what it does — and for its headline weakness.

Document	What it does	Headline concern
HEAR	Heathrow Expansion Appraisal Report (DfT) — the core 60-yr cost–benefit analysis: forecasts, connectivity, benefits, carbon, costs, GDP, local jobs.	<i>Net Present Value negative in every scenario.</i>
Strategic Vision for Transport	Surface-access guiding principles, mode-share targets, division of delivery & funding responsibility.	<i>Explicitly non-binding; public-funding split undefined.</i>
AoS + Noise Annex	Appraisal of Sustainability (AECOM) + noise-contour modelling (CAA/ERCD) — 11 themes; 'reasonable alternatives'.	<i>Pre-mitigation scores; noise at an outdated threshold; only two similar alternatives.</i>
HIA_n	Health Impact Analysis (AECOM) — annoyance, sleep disturbance, cardiovascular disease, stroke, dementia.	<i>Does health fully integrate noise & cumulative effects?</i>
EqIA	Equalities Impact Analysis (AECOM) — distributional effects on affected communities.	<i>Burden falls on already-vulnerable groups; not monetised in the CBA.</i>
	2026 UK Aviation Forecasts + HEAR data tables — the demand, movement & emissions	



A genuine local benefit to weigh in the balance. Expansion is estimated to support up to ~61,000 additional local jobs by 2055 (37,000–45,000 direct, plus indirect/induced), building from ~22,000–27,000 by 2040 — though the multipliers rely on a 2009 study.

Issues not covered — and the burden on local authorities

From an LA perspective, the most important gaps are these. Only air quality carries a clear acknowledgement of additional LA monitoring and mitigation burden.



Financial viability & public exposure — Who pays for third-party infrastructure, resilience, policing, border, emergency planning?



Utilities & resilience — No single framework for energy/grid, water, drainage, ICT/cyber, fuel, waste, construction logistics.



Freight forecasts — Central to the narrative, yet no separate bellyhold / freighter / surface-logistics forecasts.



Northolt — Not addressed — despite proximity, airspace, business/military use and surface access.



Airspace separated from DCO — Flight-path consequences may be unknown when the policy and DCO are decided.



Health—noise—equality integration — Are cumulative effects, night noise, sleep, cognitive development & vulnerable groups assessed together?



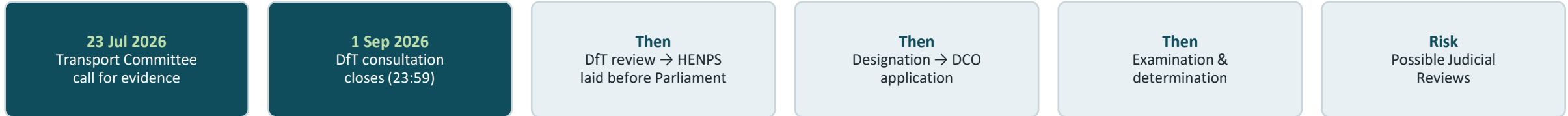
IMPORTANT The single clearest gap: the net effect on local-authority finances and administration

Nowhere in the evidence base is the LA position assessed. It does not net additional business-rates (NNDR) income against the additional service and administrative costs authorities will carry; it does not cost the DCO/examination effort, environmental-health duties, highways duties across the five affected authorities, or parking overspill; and it does not cost the housing, school-place, social-care and public-health pressures from displacement and an inbound construction workforce.

For authorities at a distance — in the Home Counties and beyond — the position is starker: they may carry surface-access, environmental and displacement pressures with little or no offsetting rateable value. This distributional question is a clear gap and a strong candidate for a joint consultation representation, with a funding mechanism to meet the burden.

Next steps, timetable & what authorities should do now

THE ROAD AHEAD



WHAT LOCAL AUTHORITIES SHOULD DO

Now – July	Agree common LA issues; allocate lead authorities/officers by topic; feed the Transport Committee; identify missing-data requests.
Consultation period	Submit a coordinated response: scope, four tests, CNGI, LA resourcing, mitigation, compensation, engagement, MBU and timetable.
Before designation	Seek HENPS text amendments — funded LA participation, stronger place-making & infrastructure commitments, clearer airspace/DCO interface.
Pre-DCO	Negotiate a Planning Performance Agreement / protocol; require draft requirements, obligations, transport, utility & compensation frameworks early.
DCO examination	Use Local Impact Reports, Statements of Common Ground and representations to secure binding requirements and obligations.
Airspace change	Track the separate CAA process alongside the DCO so communities can understand and respond to flight-path implications.

The DfT consultation questions (1): process, need, assessment & CNGI



The questions are **broad-brush and discursive** — **designed for open comment, not tight answers**. Turn each one into a specific wording ask.

Agenda area	The question — and the angle to press
Policy process / scope	Is the move to a Heathrow-only HENPS justified through a transparent statutory review — and should MBU be updated before designation?
Legal status / DCO	Should the HENPS require a funded Planning Performance Agreement (or similar) with affected authorities before DCO submission?
Need case	Has demand, hub, freight and resilience need been adequately tested against consented growth elsewhere, demand management and alternative capacity?
CNGI	Should CNGI be qualified so that residual local health, community, housing, utility, flood, defence and resilience impacts are not discounted as ordinary residual impacts?
Surface access	Are the mode-share targets sufficient, enforceable and aligned with freight, workforce, roadworks, bus/coach, rail, parking and accessibility impacts?
Engagement	How is meaningful engagement guaranteed given removal of statutory NSIP pre-application consultation — and what is the role of CISHA, HSPG, SASIG and LA forums?

The DfT consultation questions (2): the appraisal evidence

Take each supporting document in turn and put the sharp question. This is where local authorities can most affect the final HENPS text and the expectations placed on any Heathrow DCO applicant.

Document	The sharp question for your response
Forecasts (DfT26)	Where are the freight forecasts? And why is 'no expansion' excluded as a reasonable alternative rather than assessed?
HEAR	How is a negative NPV (–£23.4 bn to –£62.5 bn) reconciled with 'growth across the country'? How much of the passenger benefit is transfer, not new value?
AoS	Are the 'reasonable alternatives' fairly tested when only two near-identical Heathrow schemes are appraised? The scores are pre-mitigation — who carries the delivery risk?
Noise Annex	Assess and commit at 43 dB (~3.4 m people) before designation, not after. Model the worst case. Give firm airspace-design and night-flight commitments.
Air quality	Provide a contemporary re-assessment — including PM _{2.5} and ultrafine particles — not a figure scaled from 2018.
Health (HIA) & Equality (EqIA)	Assess health, noise and equality cumulatively and distributionally — sleep disturbance, cognitive development and vulnerable groups. Very relevant to LAs.



Recommendation. Note this assessment of the evidence base, agree the priority concerns, and commit to a coordinated consultation response before 1 September 2026.