



Response to the consultation on the draft Heathrow Expansion National Policy Statement

*A Submission on behalf of SASIG – the Strategic Aviation Special
Interest Group of the Local Government Association*

1st September 2026

Submitted to: Airports National Policy Statement Review Team, Department for Transport
Contact: Chris Cain, Policy Director, SASIG | secretariat@sasig.org.uk | 01732 220256

Foreword

This response is structured around the consultation questions published by the Department for Transport. However, it also seeks to address material omissions that do not fit neatly within the confines of those questions, as in many cases these issues are those of greatest concern to SASIG and its membership.

It has been prepared drawing on a SASIG/HSPG local-authority workshop on the HENPS held on 8 July 2026, SASIG's evidence to the House of Commons Transport Committee, and its extensive work on air-freight which we consider to be a critically important issue that the document and current Government policy currently underplays.

Thus far, SASIG has corporately adopted no overall corporate position in support of or against a third runway at Heathrow. Our focus in responding to this draft HENPS has instead been on whether it provides:

- a complete, coherent and enforceable policy framework
- the national benefits justifying its promotion are demonstrable,
- local impacts and delivery burdens are properly assessed, mitigated and funded, and whether
- appropriate governance arrangements are proposed to monitor whether commitments entered into in this document and any subsequent DCO and associated regulatory settlements and Airspace Change processes are actually adequate and have a realistic prospect of being delivered.

Keith Artus
Chairman of SASIG

1st September 2026

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1. About SASIG and status of this response

1.1 SASIG is the Strategic Aviation Special Interest Group of the Local Government Association. It is a cross-party body of local authorities in England and Wales with a strategic or local interest in aviation. Its members represent communities totalling approximately 10 million people, including authorities that host airports, neighbour airports, are affected by airspace and surface-access activity, or depend on aviation connectivity for economic and social purposes.

1.2 SASIG develops co-ordinated policy positions and technical evidence on passenger and freight forecasting, airspace, noise and health, land-use planning, surface access, economic impact, environmental performance and emerging aviation technology. Its purpose is to help reconcile the economic and social benefits of aviation with environmental protection and the legitimate interests of communities and local government.

1.3 This is a corporate response on behalf of SASIG's membership as a whole. Individual members may submit their own responses reflecting local circumstances and political positions. SASIG does not seek to duplicate that evidence and has taken no corporate position for or against a third runway. The response instead tests the adequacy, coherence, enforceability and national reach of the proposed policy framework.

1.4 The response draws directly on: SASIG/HSPG workshop attended by Heathrow-area and wider local authorities, airport consultative bodies and community representatives on 8 July 2026; SASIG's July 2026 written evidence to the Transport Committee the technical presentation to and notes of that meeting; an air-freight strategy paper prepared by SASIG; the draft HENPS and its supporting assessments; and the RABA Group response where it addresses shared interests in domestic connectivity and freight, although RABA's proposals have been re-cast here to reflect a local-authority and national-network perspective.

2. Executive Summary

Overall conclusion. The draft is a detailed site-specific planning framework, but it is not yet a complete national policy framework. It should not be designated without clearer links to policy for the rest of the airport network, stronger delivery and enforcement provisions, and further evidence on freight, regional connectivity, cumulative impacts and the public-sector burden.

2.1 SASIG recognises the strategic importance of Heathrow as the United Kingdom's principal passenger and bellyhold-freight hub, the serious operational resilience problems associated with running close to full capacity, and the potential for additional hub capacity to improve international connectivity. Those propositions do not remove the need to demonstrate that the particular policy framework is nationally coherent, economically sound, environmentally credible and capable of delivery.

2.2 The 2018 Airports National Policy Statement performed two functions: it supported a preferred Heathrow scheme and established a wider South East capacity context with potential relevance to other airport proposals. The draft HENPS retains the first function but removes most of the second. Meanwhile, the Aviation 2050 process was never completed and policy for every airport other than Heathrow continues to depend largely on the 2013 Aviation Policy Framework, the short 2018 Making Best Use policy, specialist environmental policies and case-by-case planning decisions. That is too fragmented a foundation for a decision of this scale.

2.3 The draft's four tests are a useful organising structure, but they are not yet sufficiently outcome-based. The economic test does not specify measurable national and regional outcomes; the noise test uses an aggregate 2024 comparison that can conceal severe local redistribution; the air-quality test depends on mitigation and modelling that must be updated and independently scrutinised; and the climate test does not explain what Heathrow expansion means for the carbon headroom available to other airports.

2.4 Domestic connectivity is fundamental to the claimed distribution of benefits. SASIG welcomes the proposed connectivity report, route development fund and charge discounts, but these are too discretionary and short-lived. Cornwall Council, the Council of the Isles of Scilly and the City of Doncaster Council each have a direct interest in securing connecting services from their airports illustrate why domestic air access to Heathrow is not simply a commercial issue but also a social and economic one too, because such services connect remote or re-emerging regional markets to a global hub where their own catchments cannot sustain a comparable direct long-haul network. The final HENPS should ensure that commitments made in the final HENPS and the DCO for the third runway, provide for route support over a realistic period and address slot access, timings, interlining and onward connectivity.

2.5 Freight is prominent in the draft HENPS' needs narrative but inadequately represented in the evidence and policy requirements. Heathrow is overwhelmingly a bellyhold airport; dedicated freighter capacity needs differ and are increasingly pressured at constrained London airports. UK airports handled 2.661 million tonnes in 2025, while an estimated 0.5 million tonnes of UK-origin or destination air cargo was trucked to near-European airports. Heathrow expansion is part of the answer, but by no means the whole answer. A national air-freight strategy is required to advance policy a complementary network of regional freighter hubs, with supporting measures such as Freeport status, cargo fifth freedoms and access to capital investment loans, to facilitate opportunities for air-freight expansion at airports of interest to SASIG members such as Doncaster Sheffield and Newquay Cornwall, alongside those of other suitable regional airports.

2.6 Local authorities have a key role in oversight of the delivery of Runway 3 and mitigation of its direct and secondary impacts, and yet they are peripheral in the appraisal supporting the draft HENPS. They will ultimately carry substantial planning, environmental-health, highways, housing, skills, public-health, community-cohesion and service-delivery burdens associated with the project independent of any DCO approval, but the 'package' outlined in the document as essential pre-requisites for approval, does not include a transparent assessment of net local-government costs or a durable funding mechanism to meet them. This omission is particularly serious following the removal of statutory pre-application consultation for nationally significant infrastructure projects.

3. Summary of principal recommendations

Theme	SASIG recommendation
System and alternatives appraisal	Put in place an up to date, systematic and comprehensive appraisal of London-system and national-network enhancements, examining future airport development options from system-based alternative, regional demand, resilience, and consented growth elsewhere.
National aviation framework	Publish, before or alongside designation, a timetable and scope for an updated national aviation strategy to be put in place, that explains how Heathrow, other London and regional airports will together provide and integrated solution to the future aviation needs of the UK.
Four tests	Convert each test into measurable, spatially explicit outcomes with baselines, monitoring, independent assurance, enforcement and consequences for non-compliance.
Domestic connectivity	Secure a ten-year delivery and monitoring regime through the DCO, with an adequately sized route fund, charge support, slot/timing measures and explicit engagement with regional authorities, airports, devolved administrations and Crown Dependencies.
Air freight	Publish disaggregated bellyhold, dedicated-freighter and surface-logistics forecasts; commit to a UK Air Freight Strategy and a complementary regional air-cargo network; retain protective slot/TDR arrangements until alternatives are operational.
Local authority resources	Require a local-authority impact assessment and funded participation through planning performance agreements or equivalent arrangements, extending to authorities outside the order limits where impacts arise.
Noise and airspace	Use lower-threshold evidence and local contour outcomes, secure predictable respite and a clear night ban, and align the DCO and airspace-change processes so communities can understand likely flightpaths before irreversible decisions.
Surface access	Make transport outcomes enforceable, define funding and delivery responsibility, include construction and freight movements, and prevent passenger growth from proceeding ahead of necessary public-transport capacity.
Managed growth and phasing	Introduce an environmentally managed growth framework and re-test the benefit-impact balance at each major terminal or capacity phase, including incomplete or multi-promoter scenarios.
Community and compensation	Set minimum standards for eligibility, governance, duration, indexation, independent oversight and protection against later regulatory erosion.

4. Responses to the consultation questions

4.1 Assessment of the need for the proposed expansion of Heathrow Airport

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

SASIG response: neither agree nor disagree. The evidence supports a need for additional hub resilience and capacity, but does not yet demonstrate that the draft's Heathrow-only framework is the optimal and most sustainable national response to those requirements

4.1.1 Heathrow's near-saturation is a legitimate policy concern. Operating close to the movement cap reduces the ability to recover from disruption, constrains the development of domestic and international routes and places commercial pressure on lower-yield uses of slots. Heathrow's hub function and its long-haul bellyhold network are nationally significant. SASIG therefore accepts that the Government is entitled to outline a strategic case for additional hub capacity.

4.1.2 However, the “*need for capacity*” and the “*case for this particular policy architecture*” are not identical. The appraisal compares variants of a Northwest Runway scheme and relies solely as no expansion as both the baseline benchmark for appraisal, rather than fully testing both London and national-system alternatives. Consented capacity growth at Gatwick, Stansted, Luton and London City is embedded in the baseline, yet the interaction between these airports, Heathrow and regional airports are not appraised strategic network choices. The pre-COVID 2018 Aviation Strategy, with its origins in the Davies Commission's 2015 Report is too out of date to be used as a reliable basis for determining the options for consideration.

4.1.3 DfT's 2026 forecasts materially change the geography of displacement compared with the evidence underpinning the 2018 ANPS. They indicate that most additional demand associated with expansion is captured by the London system and that the effects outside London are smaller in percentage terms, though still material in particular markets. These findings require transparent sensitivity testing. National support cannot rest simply on a claim that regions benefit through access to Heathrow while the routes, slots and commercial arrangements needed to deliver that access remain unsecured.

Terminal passengers (mppa)	2024	2040	2050	2055
London system - without expansion	179	245	269	270
London system - with expansion	179	251	295	318
Rest of UK - without expansion	113	158	205	217
Rest of UK - with expansion	113	158	195	214

Source: DfT 2026 aviation forecasts and Heathrow Expansion Appraisal Report, Table 3-8, as summarised in SASIG's Transport Committee evidence. “London system” comprises Heathrow, Gatwick, Stansted, Luton, London City and Southend.

4.1.4 The timing of capacity and benefits also matters. A runway opening date does not equate to full terminal, slot or network delivery. The consultation evidence anticipates phased terminal capacity extending well beyond runway opening. The policy should therefore:

- Guard against a scheme that incurs early environmental, land-take and construction costs but delivers national connectivity benefits late, partially or not at all.
- Publish a national airport-system assessment and a reasonable alternative based on better use of consented capacity, regional demand recapture and complementary hub access.
- Separate the resilience case from the growth case and assess resilience of the national network, not only Heathrow.
- Require the economic and connectivity case to be re-tested at defined delivery gateways, with consequences if terminal or surface-access capacity is delayed or abandoned.

4.2 The Government's four tests

Consultation question: To what extent do you agree or disagree with how the Government has set each of the four tests?

Air quality

SASIG response: partially disagree. The legal-compliance focus is necessary but not sufficient; the test should protect communities from material deterioration below legal-limit breach and should be based on contemporary, independently assured modelling.

4.2.1 The test appropriately requires that expansion should not create new breaches or make existing breaches materially worse. However, local authorities must manage health outcomes and statutory duties across a wider geography than a single legal-limit test suggests. Fine particulate matter, ultrafine particles, construction emissions, surface transport, airport operations and cumulative development should all be assessed. Modelling should use a current baseline rather than scaling earlier work, should identify sensitive receptors and Air Quality Management Areas, and should disclose assumptions about fleet turnover, road demand and mitigation.

4.2.2 The final policy should require an air-quality envelope with monitored outcomes, an independently governed monitoring network and a mechanism for pausing or limiting capacity release where performance departs materially from forecast. Local authorities should not be expected to absorb the monitoring, enforcement or public-health workload without funding.

Noise

SASIG response: partially disagree. The two-limb test and mandatory mitigations are welcome, but an aggregate comparison with 2024 can conceal significant local harm and does not resolve uncertainty created by the separate airspace-design process.

4.2.3 SASIG welcomes the requirements for a noise envelope, runway alternation, predictable respite and a 6.5-hour scheduled night-flight ban. It also welcomes recognition that annoyance occurs at lower exposure levels than previously assumed. Nevertheless, the draft measures performance principally by reference to the 51 dB daytime and 45 dB night contours and permits overall compliance even where the distribution of exposure changes materially. Communities newly or more intensively overflown may be substantially worse off even though the aggregate area or population metric remains within a 2024 comparison.

4.2.4 The evidence uses an indicative flightpath design derived from Airports Commission work, while the actual design will emerge through UKADS and the CAA airspace-change process. Policy designation and DCO examination must not pre-empt an airspace outcome that communities cannot yet understand. The final HENPS should require representative flightpath

scenarios, local authority and community involvement, spatially disaggregated limits, enforceable respite, and a reconciliation mechanism if the eventual airspace design produces materially different noise outcomes.

4.2.5 The Secretary of State should also identify who will monitor and enforce the noise envelope and night regime, how breaches will be treated, and how insulation and compensation commitments will be protected against later reduction through economic regulation. Noise policy should be updated in the light of newly published Aviation Night Noise Effects (ANNE) and Aviation Noise Attitudes Survey (ANAS) research evidence rather than relying on thresholds that the evidence itself calls into question.

Climate change mitigation

SASIG response: disagree with the test as presently framed. A test concerned only with whether the scheme materially impairs national targets does not explain how carbon-constrained aviation growth will be allocated across the UK airport network.

4.2.6 The draft requires the scheme not to have such a significant emissions effect that it materially affects the Government's ability to meet carbon targets. That is a high-level legal safeguard rather than a strategy for managing aviation emissions. It relies on assumptions about sustainable aviation fuel, fleet efficiency, carbon prices and demand that remain uncertain over a long appraisal period. It also does not answer the question of direct relevance to SASIG members: if Heathrow absorbs a large share of aviation growth within a sectoral carbon constraint, what headroom remains for airports elsewhere?

4.2.7 The final HENPS should be accompanied by a network-wide carbon statement and an environmentally managed growth framework. That framework should report actual versus forecast aircraft, surface-access, construction and operational emissions; specify review points; and define corrective measures. It should avoid simply displacing activity or emissions to near-European hubs, particularly for freight, where cross-Channel trucking creates avoidable emissions without eliminating the flight.

Economic growth across the country

SASIG response: disagree. The test is too general and is not tied to measurable regional connectivity, productivity, employment or supply-chain outcomes.

4.2.8 The draft states an ambition for credible and meaningful UK-wide growth, but the supporting appraisal indicates that monetised welfare costs exceed monetised benefits across the tested cases, while separate GDP effects are small, uncertain and geographically concentrated. The test should not be passed solely through an assertion that Heathrow is nationally important. It should require a delivery plan showing how benefits reach nations and regions, how displacement is accounted for, and which outcomes will be monitored.

4.2.9 Domestic connectivity is the principal mechanism through which many places are expected to benefit. The proposed report, fund and discounts are therefore not ancillary mitigation; they are core components of the economic test. The test should include targets for the retention, restoration and creation of routes, effective connection timings, reliability, interlining and access for thinner markets. It should also account for freight-dependent sectors and for the role of regional freighter airports in keeping logistics activity, airport revenue and supply-chain resilience within the UK.

4.2.10 Local growth claims should be supported by contemporary labour-market and skills evidence and should account for housing, infrastructure and service costs. Job creation at or around Heathrow is not a net national benefit if it is primarily displaced from other regions or if enabling costs fall unfunded on local authorities.

4.3 Deliverability, effectiveness and proportionality of environmental mitigation

Consultation question: To what extent do you agree or disagree that the proposed mitigation measures are deliverable, effective and proportionate?

SASIG response: partially disagree. The range of measures is substantial, but too many depend on future scheme design, later guidance, voluntary engagement, uncertain funding or enforcement not yet allocated to a responsible body.

4.3.1 The ‘*package*’ contains important safeguards, including noise-envelope requirements, respite, night restrictions, project-level environmental assessment, biodiversity net gain, air-quality mitigation, health assessment, compensation and place-making provisions. SASIG’s concern is not principally the absence of headings; it is the *gap between policy language and delivery*.

4.3.2 An *environmentally managed growth framework* is missing. The final HENPS should set binding indicators, baselines, trigger levels, reporting frequency, independent assurance and pre-agreed corrective measures. Capacity should be released only when enabling infrastructure and environmental performance allow it. Without such a framework, mitigation is evaluated mainly as an intention at consent stage rather than as an operational constraint over decades.

4.3.3 *Utilities and resilience* need integrated treatment. Electricity and grid capacity, water supply, drainage and sewerage, waste, fuel, digital and cyber resilience, Border Force and Home Office assets, and construction logistics should form a single critical-infrastructure plan. The plan should cover disruption and incomplete-phasing scenarios and identify who funds reinforcement.

4.3.4 *Place-making* requirements at paragraphs 4.110-4.112 are welcome, particularly recognition of impacts beyond the order limits. They should be strengthened to require joint working with affected authorities from scheme inception, alignment with local plans and infrastructure strategies, replacement of community facilities before loss wherever practicable, and monitoring of indirect displacement, severance and service-access effects.

- Secure mitigation in the DCO or other legally enforceable instruments, with named delivery and enforcement bodies.
- Require independently assured environmental monitoring and publicly accessible data.
- Provide full cost recovery for local-authority assessment, monitoring and enforcement functions.
- Re-test mitigation affordability and the overall benefit-impact balance at each major delivery phase.

4.4 Definition of the scheduled night-flight ban

Consultation question: Should the ban be defined by the time an aircraft takes off or lands rather than departure from or arrival at the terminal?

SASIG response: agree, subject to safeguards. The environmentally relevant event is the aircraft movement experienced by communities. Take-off and landing times are therefore the clearer basis, but the permitted window, exceptions and enforcement must be unambiguous.

4.4.1 A movement-based definition aligns the rule with noise exposure and is easier for communities to understand. A terminal-based definition could allow taxiing and queuing to shift the actual overflight into the protected period. SASIG therefore supports defining the restriction by take-off and landing time.

4.4.2 The exact continuous 6.5-hour period should be settled before designation or subject to a tightly defined approval process. The policy must distinguish scheduled, delayed, emergency,

humanitarian and dispensation movements; prevent routine scheduling immediately outside the ban from eroding shoulder-period protection; require publication of all exceptions; and provide sanctions for repeated non-compliance. The wider eight-hour night period from 23:00 to 07:00 should remain relevant to assessment, mitigation and incentives even where the scheduled-flight ban is shorter.

4.5 Designation as Critical National Growth Infrastructure

Consultation question: To what extent do you agree or disagree with designating Heathrow expansion as Critical National Growth Infrastructure?

SASIG response: neither agree nor disagree. Heathrow may reasonably be treated as nationally significant, but the proposed status must not convert uncertain national benefits into a presumption that discounts residual local harm.

4.5.1 The designation places substantial weight on the national case. That makes the definition and enforceability of the four tests decisive. At present the national distribution of economic benefits, the interaction with the wider airport network and the treatment of local cumulative effects are not robust enough to support an unqualified presumption.

4.5.2 The final HENPS should make clear that CNGI status does not diminish statutory environmental obligations, the Public Sector Equality Duty, the need to assess reasonable alternatives, or the weight to be given to severe local effects. Health, housing, community cohesion, utilities, flood risk, surface access, resilience and local-government capacity should not be categorised as ordinary residual matters simply because the scheme has a national label.

4.5.3 National resilience should itself be part of the CNGI assessment. Concentrating additional activity at one site can create systemic vulnerability. The policy should demonstrate how Heathrow expansion complements rather than weakens a diversified network, including regional passenger and freight capacity.

4.6 Fairness of compensation for affected residents

Consultation question: To what extent do you agree or disagree that compensation is fair?

SASIG response: unable to agree on the present information. Headline commitments are not enough to assess fairness where eligibility, valuation, governance, indexation, duration and protection against later dilution remain unresolved.

4.6.1 *Fair compensation* should cover compulsory acquisition and relocation, noise insulation, loss of amenity, community facilities, vulnerable households, tenants as well as owners, and communities exposed to changed flightpaths beyond the immediate scheme boundary. Eligibility should follow impact, not an arbitrary administrative line.

4.6.2 *The community fund* is potentially valuable but requires a transparent independent governance model, long-term duration, inflation protection, published allocation criteria and representation from affected local authorities and communities. It must be additional to, not a substitute for, statutory mitigation or promoter obligations.

4.6.3 *Commitments should be secured against future erosion.* Evidence cited at the SASIG workshop concerning reductions in proposed insulation provision during economic regulation illustrates why the HENPS must specify minimum outcomes and not leave essential mitigation dependent on later affordability judgements. Local authority costs should be addressed separately through full-cost recovery and funding agreements.

4.7 Surface-access requirements and the Surface Access Vision

Consultation question: To what extent do you agree or disagree with the surface-access requirements, including passenger mode-share targets, and what further comments do you have?

SASIG response: partially disagree. The direction is welcome, but a non-binding vision, uncertain project scope and undefined funding responsibilities are not adequate where transport delivery underpins the economic, air-quality and climate cases.

4.7.1 *Mode-share targets* are necessary but should be staged, monitored and enforced. The applicant should be required to demonstrate how passenger and employee demand, construction traffic and freight movements will be accommodated without unacceptable pressure on the strategic and local road networks. The assessment should consider communities and corridors well beyond the order limits.

4.7.2 *Necessary rail and public-transport interventions* should not be deferred to a “credible plan” outside the DCO where their delivery is essential to the assessed outcome. The final statement should identify governance, funding principles and decision gateways involving DfT, National Highways, Network Rail/Great British Railways, Transport for London, the Mayor and affected authorities. Passenger capacity should not rise beyond specified thresholds unless the necessary transport capacity is operational.

4.7.3 *Freight surface access is a notable gap.* Heathrow cargo depends heavily on road feeder services; expansion and any change in the balance between bellyhold and freighter traffic will affect warehouse locations, HGV flows, driver facilities, border processes and night activity. These flows should be forecast separately and integrated with a national airfreight and logistics strategy.

4.7.4 *Regional connectivity policy* should avoid treating long-distance surface travel to Heathrow as the default answer. Where viable, access from Cornwall, South Yorkshire and other more distant regions should be provided through domestic air services or complementary regional airports, reducing long surface journeys and strengthening local economic resilience.

4.8 Updating the Making Best Use policy

Consultation question: To what extent do you agree or disagree that Making Best Use should be updated, and what should be considered?

SASIG response: strongly agree. An update is essential and should form part of a broader national aviation strategy published before or alongside HENPS designation.

4.8.1 The 2018 Making Best Use policy is too short and too general to carry the strategic burden now placed upon it. It was issued alongside an Airports NPS that contained a wider capacity context. Once the HENPS becomes expressly Heathrow-only, every other airport and host authority is left with an increasingly fragmented set of national policies.

4.8.2 The update should provide a spatial and functional framework for the UK airport network, covering the London system, major regional airports, smaller connectivity airports, freight-specialist airports, business and general aviation, emergency and special-mission uses, and advanced air mobility. It should state how passenger, freight, carbon, noise and surface-access capacity are to be managed across the network and how local plans should respond.

4.8.3 It should also address cumulative effects, airport resilience, slot policy, Public Service Obligations, domestic route support, Crown Dependency connectivity, Traffic Distribution Rules, regional freight capacity, airspace modernisation, energy and utility requirements, and the relationship between national policy and devolved or local strategies.

4.8.4 SASIG recommends a firm publication date and formal local-government involvement in preparation. Updating MBU after HENPS designation without a timetable would perpetuate the very policy gap highlighted by this consultation.

4.9 Effectiveness of the framework for DCO decision making

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

SASIG response: partially disagree. The chapter structure is usable, but material ambiguity remains over phasing, multiple promoters, airspace, enforcement, local-authority participation and the relationship with the wider airport network.

4.9.1 A National Policy Statement should reduce uncertainty by resolving strategic questions and expressing clear application and decision-making requirements. The draft succeeds in identifying a wide range of impacts but often postpones key matters to the applicant, later guidance or the Secretary of State's judgement. This is especially problematic where the four tests are intended to carry decisive weight.

4.9.2 The final HENPS should address foreseeable multi-promoter and phased-development scenarios. It should define the minimum integrated scheme, responsibility for common infrastructure, sequencing of runway, terminal, transport and mitigation works, and the consequences if a phase is delayed or never completed. The national benefit case should be re-tested at gateways rather than assumed to endure unchanged over a 20- to 25-year delivery programme.

4.9.3 The DCO and airspace-change processes must be aligned. It is unreasonable to expect authorities and communities to assess noise and health effects without credible information about where aircraft will fly. The final policy should define information requirements at application, consultation interfaces, assumptions to be tested and a mechanism for revisiting consent requirements if final airspace design differs materially.

4.9.4 Community engagement provisions at paragraphs 5.357-5.362 are welcome in principle, including a community engagement board. However, the removal of statutory pre-application consultation increases the importance of enforceable standards. The applicant should be required to fund meaningful participation by affected authorities and community bodies, use existing forums where effective, and publish a consultation and response record. A funded planning performance agreement or equivalent should be in place before DCO submission.

4.10 Supporting documents and the Public Sector Equality Duty

Consultation questions: Do you have comments on the supporting documents, and does the draft take due regard of its obligations under the Public Sector Equality Duty?

SASIG response: the suite is extensive but incomplete; due regard cannot be treated as a one-off conclusion. The assessments identify significant adverse and distributional effects, but further integration, local granularity and delivery safeguards are needed.

Appraisal of Sustainability and alternatives

4.10.1 The Appraisal of Sustainability provides a broad catalogue of effects, but the strategic alternatives are too narrow. Comparing Heathrow scheme variants does not substitute for testing a London-system and national-network alternatives. Many scores are necessarily pre-mitigation, while the needs and economic cases assume mitigation and enabling infrastructure will be

delivered. The final appraisal should make this dependency explicit and test non-delivery and partial-delivery scenarios.

Health Impact Analysis

4.10.2 The Health Impact Analysis acknowledges major adverse effects relating to housing, social infrastructure, community identity and cohesion, and air quality, alongside employment and skills benefits. These pathways should be integrated with noise, equality, surface-access and place-making analysis at a local level. Monitoring should use indicators agreed with Directors of Public Health and should be funded for the duration of construction and operation.

Equality Impact Assessment and PSED

4.10.3 SASIG accepts that DfT has undertaken an Equality Impact Assessment, but the duty is continuing. Affected groups include disabled people, older people, children, low-income households, tenants, communities facing displacement, shift workers, and people whose access to services is disrupted. The final HENPS should require equality outcomes to be monitored by phase, with targeted mitigation and meaningful engagement. It should not assume that general employment benefits offset specific adverse effects on protected groups.

Missing evidence

- Separate national and airport-level freight forecasts distinguishing bellyhold, dedicated freighter and road-feeder traffic.
- Cumulative analysis across the London airport system and wider UK network, including regional airport viability and resilience.
- Net financial and administrative impact on local authorities, including authorities outside the order limits.
- Contemporary evidence on scheme costs, financing, airport charges, deliverability and exposure to public funding.
- Integrated utilities, energy, water, waste, digital, security and construction-logistics assessment.
- More transparent spatial distribution of economic benefits and displacement.

4.11 Additional comments on the draft HENPS

Consultation question: What additional comments do you have?

Domestic connectivity: national benefit requires a delivery mechanism

4.11.1 SASIG supports the recognition in paragraphs 5.144-5.151 that expansion should protect and strengthen existing domestic routes and secure new routes. The proposed domestic connectivity delivery report, route development fund and discounted airport charges are constructive. They should, however, be strengthened and secured as core national-benefit requirements.

4.11.2 The current minimum of support for five routes for at least three years is unlikely to be sufficient for thinner regional markets, particularly where aircraft availability, airline concentration and route start-up economics have deteriorated. Monitoring for only three years after capacity release is also too short for a programme whose benefits are expected to mature over decades.

4.11.3 Local-authority interests are concrete. Cornwall Council and the Council of the Isles of Scilly depend on connectivity arrangements that link peripheral communities into national and international networks. The City of Doncaster Council regards a Heathrow route as important to the reopening and future role of Doncaster Sheffield Airport. These are not claims that every proposed route must be operated regardless of evidence; they demonstrate why the framework must assess airport-pair catchments, connecting traffic, timings and strategic economic value rather than relying only on city-pair point-to-point volumes.

HENPS provision	SASIG requested strengthening
Delivery report	Baseline all current routes and frequencies; identify candidate routes; set measurable targets; report annually from pre-opening through at least ten years after capacity release.
Route development fund	Set an adequate transparent budget; support at least the HENPS minimum plus replacements for routes lost before opening; allow five- to ten-year support where evidence shows persistent market failure.
Airport charges	Secure discounts for existing and new routes and publish the methodology; require evidence and consultation before withdrawal.
Slots and schedules	Address slot access, early/late rotations, connection windows, interlining, codeshare and route continuity, not simply whether a route exists.
Governance	Co-design with regional airports, local authorities, Mayors, devolved administrations, Crown Dependencies, airlines and business bodies; provide independent monitoring.
DCO status	Use requirements and obligations, not discretionary aspirations, and establish corrective action if connectivity outcomes are missed.

Air freight: Heathrow is necessary but not sufficient

4.11.4 Heathrow's freight role is strategically important, but approximately 95 per cent of its tonnage is carried in passenger bellyholds. Dedicated freighters serve different markets, including express traffic, outsized and hazardous goods, live animals and time-critical supply chains. Their economics and slot needs differ. A passenger hub operating at high utilisation will naturally favour higher-revenue passenger movements, so a national freight strategy cannot rely on Heathrow alone.

Indicative UK air-freight position	Tonnes
Handled at UK airports, 2025	2.661 million
Estimated UK-origin/destination cargo trucked to near-European hubs	c.0.50 million
Indicative current total demand	c.3.16 million
Indicative 2050 demand range	4.9-5.7 million
Indicative 2050 capacity gap after identified increments	c.1.1-1.9 million

Sources: CAA Annual Airport Data 2025; SASIG/Northpoint analysis; OBR-linked demand scenarios. Leakage and future gap values are estimates rather than official DfT forecasts and should be independently validated.

4.11.5 Cross-Channel leakage adds road distance, border risk, time and cost; transfers airport and logistics revenue to competing European hubs; and creates avoidable HGV emissions. It also makes the UK reliant on foreign infrastructure for high-value supply chains in pharmaceuticals,

aerospace, defence, advanced manufacturing, semiconductors, perishables and e-commerce. For local authorities, freight affects employment, business rates, land-use planning, warehousing, roads, night activity, emergency planning and inward investment.

4.11.6 SASIG therefore supports a complementary model: Heathrow as the main long-haul passenger and bellyhold hub; East Midlands as an integrator centre; and a planned network of suitable regional freighter airports, with Manston in Kent and Prestwick in Scotland prospectively being an important additional nodes which over time will be able to replace freighter slots lost at Stansted and Luton

4.11.7 Doncaster Sheffield is of particular interest to the City of Doncaster Council as part of its reopening strategy, while other airports can serve their own regional industrial clusters and provide national resilience. Selection should follow transparent criteria covering runway and operating capability, 24-hour availability, land, road access, customs and Border Force readiness, environmental constraints, local planning and market demand.

- Commit in the final HENPS to a standalone UK Air Freight Strategy, with DfT and DBT leadership and local-government representation.
- Publish 2050 forecasts and capacity scenarios for bellyhold, freighter and road-feeder activity, including leakage to near-European hubs.
- Create a Heathrow-regional freight network plan covering common data, road-feeder arrangements, carrier development, customs, handling and resilience.
- Do not remove Traffic Distribution Rules or other protections until replacement UK freighter capacity and slot reforms are demonstrably operational.
- Establish targets for leakage reduction, regional share, network resilience and emissions per tonne-kilometre, with annual reporting.

Local authority delivery, finance and governance

4.11.8 The draft does not identify the net financial and administrative effect on local government. Authorities will contribute specialist evidence to the DCO, carry highways and environmental-health responsibilities, plan housing and community infrastructure, support skills and employment programmes, respond to displacement and construction pressures, and monitor operational impacts. Some authorities will bear effects without receiving material business-rate benefit.

4.11.9 The final HENPS should require an applicant-funded local authority impact assessment, full-cost recovery, and resourced participation extending beyond immediate host boroughs where evidence shows effects. Existing strategic forums should be used where they work, but the policy should not assume that voluntary collaboration substitutes for resources, data access or enforceable rights.

Policy process and legal resilience

4.11.10 Changing from an Airports NPS with wider relevance to a Heathrow-only HENPS is a substantive alteration to policy architecture. The final decision should transparently explain why the chosen review and amendment route is appropriate, what policy now governs system-wide effects, and when the national framework will be updated. Clear reasoning on alternatives, carbon allocation, distributional effects and enforcement will improve legal as well as policy resilience.

5. Consolidated amendments requested

Policy area	Requested amendment
Scope and relationship	Insert an explicit statement that Heathrow expansion must be assessed in the context of the performance, resilience and environmental capacity of the wider UK airport network; commit to a dated national aviation/MBU update.
Need and alternatives	Require publication of a cumulative London-system and UK-network assessment and a system-based reasonable alternative before designation.
Economic test	Define measurable UK-wide and regional outcomes, including connectivity, productivity, freight, jobs, displacement and enabling costs; report performance by region.
Climate test	Add a network-wide carbon statement and an environmentally managed growth framework with monitoring, gateways and corrective action.
Noise test	Require spatially disaggregated outcomes, lower-threshold evidence, enforceable respite, clear enforcement, and reconciliation with final airspace design.
Air quality test	Require contemporary modelling, PM2.5 and ultrafine-particle consideration, funded local monitoring and capacity controls where outcomes are missed.
Domestic connectivity	Strengthen paragraphs 5.144-5.151 to secure a ten-year delivery regime, adequately funded route support, charge incentives, slot/timing outcomes and representative governance.
Freight	Add a requirement for disaggregated forecasts, a UK Air Freight Strategy and a Heathrow-regional freight plan; acknowledge complementary regional freighter hubs.
Surface access	Make necessary infrastructure and mode-share outcomes binding; allocate funding and responsibility; include freight, construction and wider corridors.
Local authorities	Require full-cost participation, a local-government impact assessment, funded PPAs or equivalent and engagement beyond order limits.
Community/compensation	Set minimum standards on eligibility, governance, duration, indexation, transparency and protection from later dilution.
Phasing/promoters	Define integrated-scheme, common-infrastructure and gateway requirements for phased or multi-promoter delivery, including incomplete-scheme scenarios.

6. Evidence base and sources

6.1 The submission has been prepared from the following principal sources. References to draft HENPS paragraphs are to the June 2026 proposed draft revision, corrected on 22 June 2026.

Source body	Document/evidence
Department for Transport	Draft Heathrow Expansion National Policy Statement: consultation on proposed amendments, consultation questions and supporting-document index, 18 June 2026.
Department for Transport	Proposed draft revision to the Airports National Policy Statement - to be known as the Heathrow Expansion National Policy Statement, June 2026.
Department for Transport	Heathrow Expansion Appraisal Report; UK Aviation Forecasts 2026; Appraisal of Sustainability and Noise Annex; Habitats Regulations Assessment; Equality Impact Assessment; Health Impact Analysis; Surface Access Vision.
SASIG	Written evidence to the House of Commons Transport Committee inquiry into the draft HENPS, July 2026.
SASIG/HSPG	Local authority workshop presentation, HSPG local-authority perspective and meeting notes, 8 July 2026.
SASIG	Why the UK Needs a National Air Freight Strategy, discussion paper, February 2026.
RABA Group	Submission to the draft HENPS consultation, August 2026, used where it supports shared local-government concerns on domestic connectivity and freight.
Civil Aviation Authority	Annual Airport Data 2024 and 2025.
Government policy	Aviation Policy Framework (2013); Airports National Policy Statement and Making Best Use policy (2018); overarching aviation noise policy (2023); Future of Freight (2022); relevant airspace and planning policy.

Official consultation page: <https://www.gov.uk/government/consultations/draft-heathrow-expansion-national-policy-statement-proposed-amendments>

Official draft HENPS publication page: <https://www.gov.uk/government/publications/draft-heathrow-expansion-national-policy-statement>

7. Priority actions before designation

7.1 SASIG does not suggest that every project-level detail must be settled in the National Policy Statement. It does, however, distinguish between matters properly left to scheme design and strategic questions that must be resolved before designation. The latter include the relationship with national aviation policy, the distribution and enforceability of economic benefits, the treatment of carbon-constrained growth elsewhere, the basis for domestic connectivity, and the absence of a national freight capacity plan.

7.2 Before laying a final HENPS for approval, the Department should publish a response schedule identifying which SASIG and other stakeholder concerns will be addressed through: amendment of the HENPS; further evidence; the forthcoming Making Best Use or national aviation policy review; DCO requirements; regulatory action by the CAA; or a separate Government programme. This would reduce the risk that important issues fall between institutional responsibilities or are repeatedly deferred.

7.3 The Department should also establish an implementation forum involving affected and airport-hosting local authorities, regional authorities, devolved administrations, airport and airline representatives, freight interests and community bodies. Its early work should cover domestic

route outcomes, the air-freight strategy, surface-access governance, local-authority resources, environmental monitoring and alignment between the DCO and airspace-change processes. The forum should complement, not replace, local engagement and statutory decision-making.

7.4 Finally, the designated statement should include a formal monitoring and review schedule. Reporting should cover scheme delivery, expenditure and affordability; national and regional connectivity; passenger and freight outcomes; economic benefits and displacement; carbon, noise and air quality; surface access; compensation; and local-authority costs. Parliamentary and public scrutiny should occur at defined gateways rather than only through a five-year policy review after commitments have become difficult to change.