



Strategic Aviation Special Interest Group (SASIG)

Advancing sustainable aviation policy on behalf of local communities

Written evidence to the House of Commons Transport Committee

Inquiry: Scrutiny of the draft Heathrow Expansion National Policy Statement

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1. Introduction: about SASIG and the basis of this submission

1.1 SASIG is the Strategic Aviation Special Interest Group of the Local Government Association. We are a cross-party body of local authorities in England and Wales with a strategic or local interest in aviation. Our members represent communities totalling some 10 million people — around a sixth of the UK population — who are directly or indirectly affected by aviation activity. Our aim is to ensure that UK aviation policy is developed and implemented in a way that reconciles economic, social and environmental considerations appropriately, and that the interests of local communities are properly weighed in national decisions.

1.2 SASIG prepares co-ordinated responses to Government consultations, commissions research, develops policy positions and provides technical advice to member authorities covering passenger and freight forecasting, airspace, land use planning and surface access, new technology and economic and environmental impact. We are represented on, among others, the Department for Transport's Airspace Management Board, Aviation Noise and Environment Group, DEFRA's Noise Stakeholder Group and the CAAs Environment Forum and we have given evidence to select committees and All-Party Parliamentary Groups over many years. SASIG engaged directly with the Airports Commission during its work and with DfT during the recent policy process that has led to the draft Heathrow Expansion National Policy Statement (HENPS).

1.3 **This is a corporate submission on behalf of SASIG's membership as a whole.** A number of our members are Heathrow authorities that will be directly affected by expansion; as is standard practice for SASIG several will be submitting their own views. This submission does not duplicate that local evidence. It addresses the question that concerns our whole membership, including authorities hosting or neighbouring airports across the London system and the English and Welsh regions: **whether a National Policy Statement confined to a single airport can properly discharge the functions of national aviation policy, and what the consequences are for communities and local authorities elsewhere.**

1.4 SASIG takes no corporate position for or against a third runway at Heathrow. Our members hold a range of views. Our concern is with the adequacy, coherence and transparency of the policy and evidence on which Parliament will ultimately be asked to support, and with the distribution of costs, risks and administrative burdens that the draft HENPS leaves unresolved. This submission draws on a technical review undertaken for SASIG's Secretariat and on the outcomes from a local authority workshop on the draft HENPS convened by SASIG on 8 July 2026, at which participants included officials from West London boroughs and Home Counties authorities, the Heathrow Strategic Planning Group, the UK Airport Consultative Committees and the Heathrow Airport Consultative Committee. Direct responses to the Committee's twelve questions are provided at **Annex A**.

2. Summary of SASIG's position

- **The scope of the draft is too narrow for the description “national”.** The 2018 Airports NPS set a South East capacity need and was “important and relevant” to other airports. The HENPS strips that out. Nothing has replaced it, and no policy instrument now exists against which system-wide effects can be judged.
- **There is no coherent national aviation strategy against which the draft can be evaluated.** Aviation 2050 was consulted on but never completed. Policy is assembled from an incoherent patchwork encompassing the 2013 Aviation Policy Framework, the 2018 Making Best Use policy, Jet Zero, airspace and noise policy and case-by-case planning decisions. This is not a sound policy framework for one of the UK's most important industries.
- **The implications for the London airport system and more widely for regional airports are not assessed.** The Government's own forecasts show displacement has moved inside the M25 and that airports outside London are marginally smaller with expansion than without. A system-based alternative — including recapture of regionally originating demand that currently reaches Heathrow by surface mode — has never been tested.
- **Air freight is mentioned as important in the narrative but absent from the supporting evidence.** There are no separate freight forecasts, no distinction between bellyhold and freighter markets, no treatment of leakage to near-European hubs and no assessment of surface freight movements. *The UK needs an air freight strategy.*
- **The extent and Significance of the Noise and health impacts are not fully articulated.** Assessment is against thresholds the Government's own recent evidence indicates are out of date, using an indicative flightpath design from 2015, with air quality figures scaled from 2018 rather than re-modelled. The lack of integration between land use and airspace planning when developing the evidence bases is a major fault in the policy making process.
- **The carbon question is unanswered.** If expansion is to be delivered within the aviation sector's carbon constraint, the draft does not explain what that implies for growth at other airports — particularly in the regions and devolved nations.
- **Of particular concern to SASIG, its members and their communities are local secondary and cumulative impacts which are not assessed at all.** Nowhere does the evidence base even attempt to establish the net impact on the financial and administrative position of affected authorities, or of authorities at a distance who may carry cost without the benefit of offsetting rateable value.

3. A National Policy Statement of unduly narrow scope

3.1 The 2018 Airports National Policy Statement did two things. It identified a preferred scheme at Heathrow, and it established a need for additional runway capacity in the South East, with its contents expressly “important and relevant” to decisions on other airport infrastructure in London and the South East. The draft HENPS does only the first. The wider geographic framing, the strategic alternatives chapter and the read-across to other airports have all been removed; non-Heathrow capacity questions now fall to the 2013 Aviation Policy Framework, the Making Best Use policy, local plans and case-by-case determinations.

3.2 The practical consequence is that **there is no longer any policy document against which Southeast or national system effects can be assessed**, at precisely the moment when consented growth at Gatwick, Stansted, Luton and London City has been built into the capacity baseline. The draft is silent on how Heathrow expansion interacts with that consented growth, on the position of Northolt once a third runway opens, and on the relationship between Heathrow and the larger regional airports at Manchester, Birmingham, Bristol and Edinburgh, whose catchments and/or connectivity are directly affected by hub capacity decisions.

3.3 SASIG also invites the Committee to consider whether treating a change of this significance as a “reflective amendment” under the Planning and Infrastructure Act 2025 is appropriate. Moving from an Airports NPS with cross-cutting relevance to a Heathrow-only statement is not a drafting exercise; it alters the policy architecture for every other airport proposal in the country. Where a statutory route designed for changes that reflect existing published policy is used to effect a substantive narrowing of scope, the transparency of the review process itself becomes a proper matter for parliamentary scrutiny.

3.4 This matters to local government beyond Heathrow. Authorities across our membership rely on national policy to give them a defensible basis for local plan-making, for responding to airport growth proposals and for negotiating mitigation. A national statement that addresses one airport and expressly disclaims effect elsewhere leaves them with less, not more, policy certainty than they had in 2018.

4. The absence of a coherent national aviation strategy

4.1 The last attempt at a comprehensive national aviation strategy, the Aviation 2050 Green Paper, was consulted on in 2018 but never completed. Since then policy has been assembled piecemeal. The residual baseline remains the 2013 Aviation Policy Framework and as a response to an unusual political environment (a compromise associated with a Coalition Government) that was only partial in its scope. That means the last full a complete Aviation policy for the UK was the 2003 Air Transport White Paper delivered under the stewardship of then SoS for Transport, Alistair Darling. The Making Best Use policy of 2018 is an eleven-page document that provides the central reference point for approving growth at every airport other than Heathrow, despite being drafted alongside an NPS that no longer exists in its original form with very little by way of detailed supporting evidence base. Jet Zero, Flightpath to the Future, airspace modernisation, night flight policy and slot policy each have their own narrow or specialist focus and have proceeded to their own independent timetable.

4.2 Heathrow expansion is therefore being decided against a backdrop of fragmented and ageing policy rather than an integrated framework. SASIG considers this the single most important structural weakness in the package before the Committee. It is not possible to judge whether a scheme delivers “growth across the country” without a national spatial framework that says what role each part of the airport network is expected to play, what growth is anticipated where, and how the resulting environmental capacity is to be allocated.

4.3 **SASIG’s recommendation is that the Making Best Use policy should be reviewed, and an updated national aviation policy framework published, before or alongside designation**, so that Heathrow expansion is considered as part of a national system rather than in isolation. At minimum, the final HENPS should state expressly how it is to be read alongside the policies that govern the rest of the network and commit to a date by which the wider framework will be brought forward, otherwise Judicial Review challenges seem inevitable.

5. The London airport system and the UK’s regional airports

5.1 The Government’s revised forecasts materially change the regional argument, and not in the direction the strategic case implies. Under the 2017 evidence used for the 2018 ANPS, expansion was expected to draw significant demand out of the regions into London. Under DfT’s 2026 forecasts, the principal effect is displacement **within** the London system. Airports outside London are projected to be only around one per cent smaller in 2055 with expansion than without — while the London system captures the overwhelming majority of the absolute uplift and virtually all long-haul growth. While we are deeply sceptical about these findings, the evidence presented publicly and the time that has been available since the forecasts were published has to date not allowed the more detailed interrogation that they merit. We hope that the Committee will do this through its hearings.

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. London system defined as LHR, LGW, STN, LTN, LCY and SEN.

5.2 Two conclusions follow. First, the smaller displacement effect, if true, is welcome and helps rebut the proposition that Heathrow expansion drains the regions of traffic; but testing this finding robustly will be essential to securing wider national support for the proposition. Second, and more importantly for this Committee, **the regional benefit claimed for expansion is access to Heathrow’s connections, not growth at regional airports**. The

draft does not test that claim. It does not set out how domestic connectivity to Heathrow from regional airports will be protected or improved, what slot arrangements would secure it, or what happens if airlines choose not to operate those services. Regional and smaller airports, many of which are hosted by SASIG member authorities, depend on hub access precisely because their catchments cannot sustain wide international networks independently.

5.3 Nor is a genuine ‘system’ alternative appraised. The Appraisal of Sustainability considers two near-identical Heathrow schemes; “no expansion” is excluded as a reasonable alternative on the basis that need is treated as established and is used only as the comparison baseline. **The option that SASIG believes should be tested — a London system and national network approach, in which policy ensures some of the demand that currently travels long distances by surface mode to reach Heathrow is recaptured at regional airports, alongside better use of consented capacity elsewhere — has never been appraised.** Until it is, the proposition that a third runway is the only means of meeting the identified need is *asserted* rather than *demonstrated*.

5.4 Two related points deserve the Committee’s attention. The first is resilience. It is generally accepted that a hub airport should operate at around between 80-85 per cent of capacity to enable disruptions to be absorbed and flight schedules to be restored efficiently; Heathrow currently operates at closer to 99 per cent. Resilience is a legitimate part of the need case, and SASIG accepts it as such — but it is a different argument from growth, and it points towards a different question, namely whether the resilience of the national network as a whole is best secured by concentrating still more activity at a single site as the recent fire at the electricity grid station near Heathrow demonstrated when it caused power outages across the airport. The second is the protection of the regional connectivity on which the regional benefit case depends. If access to Heathrow’s network is the mechanism by which the regions are said to benefit, the statement should say how domestic routes to Heathrow will be secured — through slot arrangements, route development support or otherwise — and what monitoring will establish whether that access has in fact improved. *At present the benefit is asserted without any delivery mechanism attached to it.*

5.5 The Committee may also wish to press on the timing of benefits. The runway is planned to be operational in 2035, but terminal capacity is released in steps in 2038, 2049 and 2054, so most of the connectivity uplift falls late in a sixty-year appraisal while carbon, noise, land take, compulsory purchase and construction disruption begin in the 2030s. However, draft HENPS does not address the foreseeable possibility of a phased scheme progressing under more than one promoter over twenty-five years, or the position if it is left incomplete. What would those scenarios mean in terms of changes to the balance of benefits and impacts?

6. Air freight: central to the case, absent from the evidence

6.1 Freight is prominent in the need case. Heathrow handled around 1.6 million tonnes in 2024 — some 60 per cent of UK airport freight by tonnage and 72 per cent by value — of which approximately 95 per cent travelled in passenger bellyhold. Yet **the evidence base contains no separate freight forecasts at all.** Bellyhold and dedicated freighter markets are not distinguished, displacement and substitution between airports are not assessed, and the surface logistics consequences are not modelled.

6.2 **This is a serious omission** with direct consequences for local authorities. Air freight generates road movements, warehousing demand and land use pressures that fall on host and neighbouring authorities, and it is one of the principal drivers of night-time activity. Without forecasts, neither the Committee nor local planning authorities can judge the scale of what is proposed.

6.3 SASIG also draws the Committee’s attention to the wider capacity position. UK airports handled 2.661 million tonnes in 2025, with an estimated further 0.5 million tonnes of UK-origin or destination cargo trucked to near-European hubs. On conservative GDP-linked assumptions, total demand rises to between 4.9 and 5.7 million tonnes by 2050. Heathrow expansion might add in the order of 0.8 to 0.9 million tonnes over several decades, and East Midlands Airport — the UK’s leading express freight airport — a further 0.25MT of headroom. Neither, together or alone, can close the gap, and neither addresses the estimated 0.5MT of general cargo flows that are already leaking across the Channel to fly from EU airports with all the financial, economic and environmental inefficiencies and loss of competitiveness for UK shippers this involves.

UK air freight, indicative position	Tonnes
Handled at UK airports, 2025	2.66 Mt
Estimated leakage to near-European hubs	c. 0.50 Mt
Total UK-origin/destination demand now	c. 3.16 Mt
Total demand, 2050 (GDP-linked range)	4.9 – 5.7 Mt
Illustrative capacity gap, 2050	c. 1.1 – 1.9 Mt

Sources: CAA Annual Airport Data 2025; OBR Economic and Fiscal Outlook March 2026; sector analysis prepared for SASIG. Leakage and gap figures are estimates, not official DfT forecasts.

6.4 SASIG therefore recommends that the Committee seek: publication of freight forecasts (independently sourced if necessary), distinguishing bellyhold, freighter and surface logistics, and explicitly including cross-Channel leakage; clear recognition of the complementary reliever role that the already consented proposals to build a dedicated air cargo facility at Manston, and a commitment to a **UK Air Freight Strategy** defining Heathrow's bellyhold role alongside a complementary network of regional freighter airports. We also support a precautionary approach to the proposed revocation of the 1991 Traffic Distribution Rules, which should be retained until alternative capacity and wider slot reform are demonstrably in place. *A national policy statement that treats freight as a headline justification while providing no freight evidence cannot be regarded as complete.*

7. Noise, health and air quality: impacts not fully articulated

7.1 Heathrow already exposes more people to aircraft noise than any other airport in the UK or the European Union: around 359,700 households within the 51 dB daytime contour in 2024, and 305,400 within the 45 dB night contour. On the Government's figures, the number of people within the 51 dB daytime contour in 2055 rises from approximately 526,500 without expansion to 741,600 with it — an increase of some 41 per cent.

7.2 SASIG welcomes the two-limb noise test, the requirement for a noise envelope with performance targets, runway alternation and a scheduled 6.5-hour night flight ban. But four difficulties remain. First, the headline commitment that overall noise will be no greater than in 2024 is an aggregate that can mask significant localised harm; the pattern of exposure shifts, and some communities will be considerably worse off. Second, assessment is carried out against 51 dB and 45 dB thresholds, when the Government's own recent evidence points towards a 43 dB threshold — at which around 3.4 million people fall within the daytime adverse effect contour with expansion. Third, the contours rely on an indicative flightpath design from 2015, while real airspace design proceeds separately through the CAA process, so communities cannot yet know who will be overflown when the policy and any subsequent DCO are decided. Fourth, **the draft does not say who secures, monitors and enforces these measures**, leaving the respective roles of the Secretary of State, the CAA and local authorities undefined.

7.3 The benefit of the night flight ban is also less than it appears if movements are simply rescheduled into the 06:00 to 07:00 period. The Committee may wish to establish what proportion of the modelled night-period benefit derives from genuine reduction as opposed to rescheduling.

7.4 On air quality, the monetised disbenefit of approximately £0.9 billion rests on figures scaled from the 2018 Addendum rather than re-modelled, and treatment of fine particulate matter and ultrafine particles is indicative only. Four air quality management areas — in Hillingdon, Hounslow, Spelthorne and South Buckinghamshire — remain sensitive. Local authorities carry the statutory duty to monitor and act in these areas. A contemporary re-assessment is required before designation, together with an explicit acknowledgement of the additional monitoring burden and how it will be funded.

7.5 Finally, affordability of mitigation is a live concern. The recent regulatory settlement reduced the airport's noise insulation provision from over £250 million to £80 million, extending the effective delivery period from around twenty years to well over a century. If mitigation on which the noise and health case depends is subsequently reduced through the economic regulation process, the policy commitments in the HENPS are not

worth what they appear. The final statement should require that mitigation commitments are secured in a form that is not vulnerable to later regulatory prioritisation.

8. Carbon budgets and the implications for growth elsewhere

8.1 Aviation carbon is now monetised in the appraisal and is the single largest disbenefit within it: 185.6 MtCO₂e on the UK account, rising to between 244 and 366 Mt on a global basis. The carbon assumptions are optimistic — sustainable aviation fuel is held at 17 per cent from 2050 — and even the more favourable technology development sensitivity leaves the appraisal negative. Compliance with net zero is defended on the UK carbon account only.

8.2 SASIG's principal concern here is one that the draft does not address at all. **If UK aviation must operate within a constrained carbon budget, and Heathrow expansion takes a substantial share of the available headroom, what does that mean for growth at every other airport in the country?** Forecast demand without Heathrow expansion already exceeds the level the Climate Change Committee has indicated is consistent with the sector's net zero pathway. Expansion increases that gap. Either the constraint binds somewhere, or it does not bind at all. The draft HENPS does not say which and does not identify the mechanism by which growth would be allocated or restrained across the network if it does.

8.3 This is not an abstract question for our members. Local authorities hosting regional airports are asked to plan for growth, to support airport masterplans and to weigh the economic case for expansion in their own areas. They are entitled to know whether national carbon policy will permit that growth once a third runway at Heathrow is built. A national policy statement that determines the largest single increment of UK aviation capacity without addressing its implications for the remainder of the network is incomplete as national policy.

8.4 SASIG therefore recommends that the final HENPS be accompanied by a statement of how aviation growth is to be reconciled with carbon budgets across the whole UK network, and that it require an **environmentally managed growth framework** for the scheme itself — monitoring actual against forecast impacts, with defined consequences where forecasts are exceeded. The absence of such a framework is a significant omission in a policy whose environmental case rests on forecast performance decades ahead.

9. Secondary impacts and the burden on local authorities

9.1 Nowhere in the evidence base is the net position of local authorities assessed. The appraisal does not set additional business rates income against the additional service and administrative costs that authorities will carry. It does not cost the development consent order and examination effort, environmental health duties, highways duties across the affected authorities, or parking overspill and enforcement of unauthorised off-airport parking. It does not cost the housing, school place, social care and public health pressures arising from displacement and from an inbound construction workforce. Only in relation to air quality is any additional local authority burden clearly acknowledged.

9.2 The scale of the secondary effects is not in doubt. The scheme involves the compulsory acquisition of approximately 756 homes and 1,219 non-residential properties, the loss of the settlements of Harmondsworth, Longford and Sipson, major realignment of the M25 and around 30,000 additional parking spaces. Around 65 million additional journeys a year are anticipated, against mode share targets of at least 50 per cent at 116 mppa and 55 per cent at 130 mppa, compared with approximately 42 per cent today. Yet the Strategic Vision for Transport is **explicitly non-binding**, rail schemes need not form part of the DCO but only a "credible plan", and the public funding split is undefined. The benefits of the scheme assume delivery of mitigation and mode share targets; the sustainability scores are pre-mitigation. If targets are missed, the congestion, air quality and community consequences fall on local authorities and their residents.

9.3 For authorities at a distance from the airport — in the Home Counties, along surface access corridors and in areas absorbing housing and labour market pressure — the position is starker still. They may carry real costs with little or no offsetting rateable value. This distributional question is entirely absent from the appraisal.

9.4 Two further matters compound the difficulty. First, the draft is comparatively weak on utilities and resilience: there is no single framework covering electricity and grid capacity, water, drainage and sewerage, waste, information and communications technology and cyber resilience, fuel supply or construction logistics, and continuity of Home Office and Border Force assets is engaged but not costed. Second, the removal of the statutory pre-application consultation requirement for nationally significant infrastructure projects weakens the position of local authorities at exactly the point where their input is most valuable. The final HENPS should require enforceable engagement standards, funded participation, and a funded planning performance agreement or equivalent with affected authorities before any DCO application is submitted.

9.5 A further structural difficulty is that three processes now run in parallel and are not aligned: the designation of the policy statement, the development consent order process, and airspace change, which is overseen by the Civil Aviation Authority outside the planning system. The practical consequence is that the flightpath implications of expansion may not be known when the policy is designated or when the DCO is determined. Communities are therefore asked to respond to a proposal without being able to establish whether they will be overflowed, and local authorities are asked to assess impacts on their residents without the information needed to do so. SASIG has raised this disconnection consistently and does so again here: the final statement should establish how the airspace change process and the consenting process are to be sequenced and reconciled, and what happens if airspace design subsequently produces noise outcomes materially different from those modelled.

9.6 SASIG recognises that there are genuine local benefits to weigh in this balance. Expansion is estimated to support in the order of 61,000 additional local jobs by 2055, building from approximately 22,000 to 27,000 by 2040, and a community fund of £50 million a year — £750 million over fifteen years — is proposed. These are material and our members do not discount them. But the employment multipliers rely on a study published in 2009, and the community fund arrangements are carried forward from the Airports Commission without eligibility, governance or duration being settled. Local authorities are also the bodies expected to deliver the housing, skills, transport and public service capacity on which those employment benefits depend. Benefits of this scale should be supported by contemporary evidence and by a funding settlement that reaches the authorities responsible for enabling them.

9.7 SASIG also invites the Committee to consider whether the Critical National Growth Infrastructure designation should be qualified. Once the four tests are judged to be met, a strong presumption in favour of consent applies and residual impacts are unlikely to justify refusal. That places very considerable weight on the tests being properly defined, locally meaningful, measurable, enforceable and resourced. Residual local health, community, housing, utility, flood risk and resilience impacts should not be capable of being discounted as ordinary residual matters simply because a national growth designation applies.

10. Conclusions

10.1 SASIG does not oppose Heathrow expansion in principle, and our members hold a range of views on the scheme itself. Our conclusion is narrower and, we suggest, harder to dismiss: **the draft HENPS is not, in substance, a national policy statement.** It is a site-specific planning framework for one airport, presented without the national aviation strategy, the system-wide analysis, the freight evidence, the carbon allocation framework and the local authority impact assessment that would be needed to make it one.

10.2 The consequence is that Parliament is being asked to approve the largest single addition to UK aviation capacity for a generation without being told what it means for the rest of the network, for the communities that host the rest of the network, or for the local authorities that will carry much of the resulting cost. The Government's own appraisal returns a negative net present value in every scenario, and the strategic case therefore rests on separate, uncertain and London-weighted GDP modelling together with non-monetised arguments. That makes the quality and completeness of the surrounding policy framework more important, not less.

10.3 These gaps are capable of being closed. Most require the publication of analysis that the Department is well placed to produce, and amendments to the text of the statement rather than reconsideration of the scheme. SASIG and its members stand ready to assist the Committee and the Department in that work.

11. Recommendations to the Committee

1. **Require an updated national aviation policy framework.** The Making Best Use policy should be reviewed and a national aviation strategy published before or alongside designation, so that Heathrow expansion is assessed within a national spatial framework rather than in isolation.
2. **Require a London system and national network assessment.** The Government should publish an assessment of cumulative effects across the London airport system and the wider UK network, covering domestic connectivity, regional airport viability, resilience and the position of Northolt.
3. **Test a system-based alternative.** A London system and national network option — including recapture of regionally originating demand currently reaching Heathrow by surface mode, and better use of consented capacity elsewhere — should be appraised as a reasonable alternative alongside the two Heathrow schemes.
4. **Publish freight forecasts and commit to a UK Air Freight Strategy.** Forecasts should distinguish bellyhold, freighter and surface logistics and include cross-Channel leakage. The 1991 Traffic Distribution Rules should be retained until alternative capacity and slot reform are in place.
5. **Assess noise at 43 dB before designation.** Assessment and policy commitments should be made at the threshold the Government's own evidence supports, with local contour-level limits, enforceable respite, firm airspace and night flight commitments, and a named body responsible for monitoring and enforcement.
6. **Re-assess air quality on a contemporary basis,** including fine particulate matter and ultrafine particles, rather than scaling figures from 2018, and fund the additional local authority monitoring burden.
7. **Secure mitigation against later regulatory erosion.** Noise insulation, compensation and community measures should be secured in a form that cannot be reduced through subsequent economic regulation, with eligibility, governance and duration settled before designation.
8. **Set out how aviation growth is reconciled with carbon budgets across the network,** stating explicitly whether expansion at Heathrow constrains growth at other UK airports, and require an environmentally managed growth framework monitoring actual against forecast impacts.
9. **Assess the net local authority financial and administrative position** across affected authorities, including those at a distance, and establish a funded mechanism to meet the resulting burden.
10. **Make surface access commitments binding.** The Strategic Vision for Transport should be enforceable, the public funding split defined, and rail delivery secured before the 130 mppa threshold.
11. **Guarantee local authority engagement and resourcing,** including a funded planning performance agreement or equivalent before DCO submission and a defined role for local authority forums, following the removal of statutory pre-application consultation.
12. **Qualify the Critical National Growth Infrastructure designation** so that residual local health, community, housing, utility, flood and resilience impacts cannot be discounted as ordinary residual impacts, and require the benefit case to be re-tested at each terminal phase.

SASIG welcomes the Committee's inquiry and would be pleased to give oral evidence or to provide further written material on any of the matters raised in this submission.

12. Contact

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Annex A — SASIG responses to the Committee's questions

References in square brackets are to the sections of the main submission.

(a) Clear and coherent guidance to the Secretary of State

The draft provides a structured framework for assessing a Heathrow application, and the four tests give a usable spine. It is not, however, coherent as national guidance, because it directs the Secretary of State to consider Heathrow largely in isolation. There is no requirement to consider effects on the London system, on regional connectivity or on the viability of other airports, and some language is carefully ambiguous — particularly on night flights, surface access and enforcement. The statement should require the Secretary of State to be satisfied that expansion strengthens, rather than weakens, the performance of the wider UK aviation network, and should say who secures, monitors and enforces each requirement. [3, 5]

(b) Robustness of the evidence and rationale for need

Demand for capacity is demonstrated; that expansion is the optimal means of meeting it is not. “No expansion” is excluded as a reasonable alternative because need is treated as settled, so the appraisal never tests a do-minimum, a demand management case or a system-based alternative. Consented growth at Gatwick, Stansted, Luton and London City is embedded in the baseline, so incremental need is measured against a system already assumed to grow, yet regional capacity alternatives were not tested with equivalent rigour. The distinction between genuinely additional growth, redistribution within the London system and displacement from elsewhere is not drawn clearly. [5]

(c) Designation as Critical National Growth Infrastructure

SASIG does not object in principle to recognising Heathrow as nationally significant. We object to the consequence being that residual local impacts are effectively discounted. Once the four tests are judged met, a strong presumption in favour of consent applies. That places decisive weight on tests that are not yet sufficiently defined, measurable, enforceable or resourced. The designation should be qualified so that residual local health, community, housing, utility, flood risk and resilience impacts cannot be treated as ordinary residual matters, and so that resilience of the wider national airport network is itself recognised as a matter of national importance. [9]

(d) The four tests

Economic growth across the country: not adequately defined. The appraisal returns a negative net present value in every scenario; the GDP uplift is small, uncertain and concentrated in London. Growth outside London is not demonstrated. **Air quality:** figures are scaled from 2018 rather than re-modelled; particulates are indicative only; four sensitive AQMAs remain. **Noise:** assessed at thresholds the Government's own evidence supersedes, using a 2015 indicative flightpath, with an aggregate headline that can mask local harm and undefined enforcement. **Climate:** defended on the UK carbon account only, on optimistic SAF assumptions, with no explanation of what the carbon constraint means for growth elsewhere. [7, 8]

(e) Adequacy of the information published alongside the draft

The suite is extensive but incomplete in four material respects: there are no freight forecasts; there is no assessment of cumulative effects across the London system or the wider UK network; scheme capital expenditure, the aeronautical and non-aeronautical income split and the aerocharge path are unpublished, making deliverability and public exposure impossible to test; and there is no assessment of the net local authority financial and administrative position. Health, equality and noise evidence is presented in parallel rather than integrated, so cumulative and distributional effects on vulnerable groups are not properly visible. [6, 9]

(f) Robustness of forecasting methodology and scenarios

The re-based 2026 model is a genuine improvement, and the publication of re-estimated elasticities is welcome. Two concerns remain. The capacity assumptions are decisive: because consented London growth is in the baseline, the finding of reduced regional displacement follows substantially from an assumption rather than from an appraisal of alternatives. And the scenario range does not adequately capture structural uncertainty — airline consolidation, aircraft supply constraints, changed business travel, carbon pricing, SAF deployment and the uneven post-pandemic recovery across airport types. Sensitivity testing of regional and domestic demand is notably thin. [5]

(g) Environmental mitigation, community measures and surface access

Requirements are comprehensive on paper and weak in delivery. The Strategic Vision for Transport is explicitly non-binding; rail need not form part of the DCO; the public funding split is undefined; and mode share targets are ambitious against current performance. Compensation arrangements need eligibility, governance and duration settled before designation, and mitigation must be secured against later erosion through economic regulation — the reduction of insulation provision from over £250 million to £80 million illustrates the risk. Utilities, resilience, waste and construction logistics lack any single framework. [7, 9]

(h) Effect of selecting the Northwest Runway scheme

Selecting a single promoter scheme has narrowed the strategic scope of the statement. The Appraisal of Sustainability appraises two near-identical Heathrow schemes, so the consultation offers a choice between variants rather than between strategies. The draft does not address the foreseeable two-promoter scenario, the interaction of parallel DCOs, or a phased scheme extending over twenty-five years that may be left incomplete by one party or another. The benefit case should be re-tested at each terminal phase. [3, 5]

(i) Consistency with wider Government policy

The draft is broadly consistent with growth and infrastructure objectives but sits awkwardly with regional growth, devolution and place-based economic policy, given that the modelled uplift is concentrated in London. It is not integrated with airspace modernisation, which proceeds separately, so flightpath consequences may be unknown when the policy and any DCO are decided. Alignment with planning policy is weakened by the absence of an updated framework for every airport other than Heathrow, and by the removal of statutory pre-application consultation. [3, 4, 8]

(j) Changes in context since 2018

The most significant change since 2018 is that the 2018 ANPS held the South East system together and the 2026 draft does not. Consented growth at other London airports, the uneven recovery of regional and smaller airports, the collapse and partial reconfiguration of business travel, new carbon obligations, the emergence of advanced air mobility and unresolved energy supply questions are acknowledged unevenly or not at all. Advanced air mobility penetration at Heathrow's cargo facilities and passenger terminals is inadequately addressed, as is airport energy supply. [3, 4]

(k) Lessons from legal challenges to the 2018 ANPS

The analytical material is fuller than in 2018 and that is welcome. However, the previous litigation turned on transparency of reasoning and the adequacy with which competing obligations were shown to have been balanced. The draft would be more resilient if it distinguished expressly between additional and redistributed economic activity; assessed cumulative network effects; addressed the carbon constraint on a global as well as a UK account; and established monitoring arrangements allowing Parliament to review whether the claimed national benefits are realised. The use of the reflective amendment route for a substantive narrowing of scope may itself invite challenge. [3, 8]

(l) Effectiveness of the Government's consultation

Publication of the supporting assessments alongside the draft is an improvement on previous processes. The consultation questions are, however, broad and discursive, and several are framed in a way that makes it difficult to respond precisely — which risks producing evidence that is harder for Government to act upon. Wider network questions are largely absent from the questions asked. The removal of statutory pre-application consultation for the subsequent DCO stage compounds this, and SASIG recommends that funded, enforceable engagement standards for local authorities be written into the final statement. [3, 9]