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Zack Polanski AM  
Kamal Churchie Way  
London  
E16 1ZE  
**Sent by email**

2 May 2025

Dear Mr Polanski,

**Response to the London Assembly Environment Committee request for expansion review update**

I am writing in response to the Committee's letter dated 24 March regarding Heathrow's expansion plans. Heathrow is the UK's only hub airport and best-connected airport in the world, critical to the nation's ability to trade and compete globally. As a hub airport, Heathrow pools demand from leisure, business and transfer passengers alongside freight and cargo. However, Heathrow is at capacity. While other international airports continue to grow their networks and connect to new markets, the UK's growth potential is constrained if Heathrow cannot also grow. A third runway at Heathrow would make a significant contribution to help deliver this Government's mission for economic growth across the UK's nations and regions. In backing Heathrow expansion, so strongly and clearly during the Chancellor's speech earlier this year, the Government has set out the need to get Britain building and ensure the benefits are felt as quickly as possible.

In February this year, we set out an intention to expand as the UK's Gateway to Growth. This includes significant private investment into existing infrastructure, enhancing terminal infrastructure and, subject to a supportive policy framework, a third runway. We will submit an updated proposal to the Government this summer. We remain committed to working with City Hall on critical environmental and carbon targets and will seek to update the London Assembly Environment Committee when discussions with the Government have concluded.

Aviation cannot thrive if the sector does not decarbonise; growth in air travel must go hand in hand with a transition to net-zero emissions. This is achievable and feasible, within both the airport's current operations and our emerging proposals for an expanded Heathrow. A third runway could only go ahead if it meets the rules on noise, air quality and carbon.

With the appropriate Government support of our proposal following the submission and, subject to a supportive policy framework, we will then be in a position to start the planning process for a third runway. Heathrow would need to demonstrate and assure relevant Ministers that we could meet the existing requirements within the UK Airports National Policy Statement (ANPS) and wider Government policy requirements. The ANPS sets out strict and legally binding climate targets as it requires Heathrow expansion to be *"deliverable within national targets on greenhouse gas emissions and in accordance with legal obligations on air quality and noise"*. Heathrow expansion would require a Development Consent Order (DCO), which is a robust planning process. Heathrow would have to prove that the airport's expansion would not materially affect the UK's climate targets of reaching net-zero by 2050 at the latest. Further, the Secretary of State for Transport would need to be satisfied that climate and environmental obligations are met before giving final approval of an expanded Heathrow proposal.

We have already made significant progress in reducing our environmental impact. Despite serving more passengers than ever before, our noise footprint is smaller than at any point since the 1970s and we are using more SAF than ever before. In 2024, 17% of SAF produced globally was used

at Heathrow, and 2.9% of total jet fuel uptake at Heathrow in the same year was SAF. Below, I have outlined some of the improvements and mitigations we have implemented in key areas.

## **Carbon**

The Climate Change Committee (CCC) advises the Government on carbon budgets under the Climate Change Act. We take this CCC view of the transition to net zero to inform our Net Zero Plan, first published in February 2022, based around the CCC's sixth carbon budget (6CB). We are currently updating that Plan to take account of latest trends and the seventh carbon budget, published in February 2025.

Our plan shows how we can reach net zero by 2050, even allowing for growth from adding a third runway. Emissions from aircraft will be reduced by several solutions, principally airspace modernisation, ongoing fleet modernisation, and the increasing use of Sustainable Aviation Fuel (SAF), with Heathrow playing its part in all of these areas, in partnership with the wider sector and through our own levers, such as how we set our landing charges. By 2050, our 2022 plan results in residual emissions below the level set out by the 6CB.

Relative to 2019, the current baseline year, our 2024 report shows that we are on track to meet our net zero plan interim goal of a 15% absolute emissions reduction "in the air" by 2030. Our ambition is to for 2019 to remain the year of peak emissions as our plans emerge.

## **Noise**

In 2024, we published our fourth five-year Noise Action Plan (NAP) following its adoption by DEFRA. The NAP sets out how we intend to build on the progress made since the 1990s in tackling aircraft noise. We have set an objective to reduce the number of people highly sleep disturbed and highly annoyed by 10% in 2030 against a 2019 baseline.

Our fleet continues to improve with over 85% of our flights operated by the quietest aircraft category (known as Chapter 14) compared with less than 60% in 2017. The noisiest category (Chapter 3) has reduced from over 40% in 2009 to less than 0.01% in 2024. Reducing our night noise impacts has seen our 2023 48dB 6.5hr night noise contour area show a reduction of 57% compared with 2006. We have continued to see improvements in our operational performance and have recently focused on reducing operations between 2330 and 0430, achieving a record high in 2024 which saw 189 nights without any flights – this compares with a 2019 baseline of 119.

In addition, in 2024 we launched Quieter Neighbourhood Support – a program of schemes which provide support to residents seeking to relocate from the highest noise exposure contours (>69dBA), acoustic insulation and ventilation for over 20,000 residential properties and 15 schools, and residential protection against vortex strikes. An independently chaired Prioritisation Panel is assisting us in administering the scheme.

## **Air Quality**

We are fully committed to working in partnership with local authorities and Government to improve local air quality, and our Heathrow 2.0: Connecting People and Planet strategy sets out how we do that.

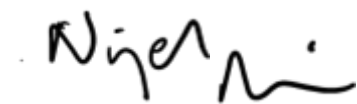
We own and operate one permanent, continuous on-airport monitoring station and four other monitoring stations in the local community. Together with our local authority partners the [Heathrow Airwatch](#) network has 22 air quality monitoring stations that continuously monitor all major pollutants around the airport, including nitrogen dioxide and particles. This is more AQ

monitoring stations than any other airport globally and more than within the London congestion charging zone.

Over the last decade, Heathrow has seen significant improvements in air quality. Our air quality monitoring stations show that pollutant levels have decreased by 39%, 37% and 35% for NO<sub>2</sub>, PM<sub>10</sub> and PM 2.5 respectively (2014 vs 2024 Annual Means). The area around Heathrow now meets all relevant air quality objectives with no exceedances observed over the last 5 years. These improvements are partly due to our active role in shifting passengers and colleagues to public transport, investing in rail links and incentivising the cleanest aircraft in our charges.

I hope the above information helps to illustrate the work we've been doing in these key areas, as we continue to work through our future proposals. We remain committed to ensuring the London Assembly Environment Committee is kept updated on our plans.

Best regards,

A handwritten signature in black ink, appearing to read 'Nigel Milton', with a stylized flourish at the end.

Nigel Milton  
Chief Communications and Sustainability Officer