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Heathrow Expansion National Policy Statement consultation

As a Member of the London Assembly, I am writing with my response to the Heathrow Expansion National Policy Statement (HENPS) consultation.

I am concerned that the Government has put so much effort into making Heathrow expansion a priority when there are other, more pressing priorities for investment. Indeed, the primary concern about Heathrow expansion I can see after the hottest summer on record, and with a prolonged drought in progress is the conflict between expanding aviation and reducing climate change emissions in the shortest possible time.

I disagree with the assessment that there is a need to expand Heathrow Airport. At present we have expansion underway to provide new capacity for passengers per annum in different stages at Gatwick (29m), City Airport (2.5m), Luton (14m), and Stansted (7.5m in 2021 and 8m in 2025). Manston airport is also set to expand usage as a freight hub airport. This scale of expansion assumes that there will be capacity for growth, whilst we know that emissions from aviation need to reduce by 2050. The risk is that investment in aviation expansion either commits us to emissions that we cannot afford to make, or leaves us with a stranded asset that cannot be used as planned – and most likely both.

All these issues from aviation expansion, particularly at Heathrow come before we consider the impacts that affect people most in their day to day lives – congestion on transport, noise disturbing lives, and pollution of the air we depend upon. Even in a world where the climate impacts are mitigated, these impacts matter as well.

On transport, I note that the London Assembly Transport Committee has also produced a response to this consultation on the question of surface transport access.¹ I support their comments on these impacts and am particularly concerned that Heathrow continues to cause a lot of traffic locally. I would say that Heathrow must ensure that not only the proportion of people who use public transport to reach the airport goes up, but that traffic in and around the airport reduces.

¹ [Transport Committee letter to Secretary of State for Transport on Heathrow expansion NPS consultation response](#), Friday 28 August 2026

On environment, I note that the London Assembly Transport Committee has also produced a response to this consultation on the question of environmental impacts.² I support this response and am particularly concerned about the impact on the environment of designation Heathrow expansion as Critical National Growth Infrastructure (CNGI), which this letter refers to. I am concerned about the impact of this on the suggested four tests.

On the four tests I make the following points:

- Air Quality
 - Air pollution in London has reduced significantly in recent years. The expansion of Heathrow cannot be allowed to be permitted based on the idea that there is any 'headroom' within the current legal limits. All health advice on air pollution is that exposure impacts are cumulative, and the World Health Organisation (WHO) has reduced their air quality guidelines some years ago. Any expansion of Heathrow should be assessed against current WHO guidelines.
 - There will be a knock-on air pollution impact if the expansion of Heathrow increases traffic to the airport. There is also a cumulative risk to London from the scale of aviation expansion at all London airports. The continued emissions of nitrous oxides at scale especially around the fringes of London create a risk to much of England of ozone episodes. Although ozone is a secondary pollutant (formed from other pollutants under strong sunshine), it should also be assessed as part of the planning for any proposed expansion of Heathrow.
 - Science on the risks of small particulate pollution, including ultrafine particles (UFP) continues to improve. There may be new evidence, and new standards that airport expansion must respond to during the lifetime of either proposed expansion or operation. It would be prudent now to fund further research into the impacts of UFPs, and to require fuller monitoring of them around not just Heathrow but all major airports.

² [Environment Committee Letter in response to Heathrow Expansion National Policy Statement \(HENPS\) consultation](#), Friday 28 August 2026

- Noise
 - The impact of noise on Londoners is at risk of worsening from two factors – both aviation expansion, and the hotter climate. The natural consequence of a hotter climate is people needing to ventilate their homes for more of the year. Flight noise that disturbs people who are trying to sleep, particularly for those on shift work will be disruptive and cause health harms, but noise is also an ongoing issue for Londoners in their daily lives for those near the airport and under flight paths.
 - There is a further conflict that whilst some measures could be funded to reduce the impact of noise, they may risk increase heat impacts. For example, extra glazing installed poorly may trap heat in homes, and any noise shielding outside, for example on playgrounds may also worsen heat impacts and cause issues on drainage. Any investment to tackle existing noise or any future impacts from proposed expansion must be undertaken in a holistic way, using as green measures as possible, and ideally combined with other measures to adapt to a warmer city. Of course, I also believe that we should prioritise such adaptation funding over expanding aviation, but we should not miss any opportunity to adapt to the warming climate.
- Climate Change Mitigation
 - I am particularly concerned by the continuing reliance on Sustainable Aviation Fuel (SAF) as a means of climate mitigation in the aviation industry. The biggest issue is that SAF will depend on securing access to feedstocks. Ultimately SAF will be a more expensive fuel than conventional kerosene, and so the mandating of SAF will be a form of rationing of demand. However, there are much simpler alternatives for rationing demand for flights – the best of which is a Frequent Flyer Levy.
- Economic Growth
 - The primary question on the economy should be on what the best use of the resources that could be committed to Heathrow expansion. There is an opportunity cost to Heathrow expansion – the choice to expand Heathrow will not just take us at speed in the wrong direction, but it will focus investment and resources – both private and public – on expansion of aviation, rather than adapting to a warmer climate, reducing our emissions by decarbonising our railways, or building the homes that so many need. Indeed, we must not forget that one of the stages of expanding Heathrow will be the demolition of homes in London, at a time when there is a housing crisis. I believe that investing in adapting to our warming climate will be our best priority.

Yours sincerely,



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