



Léonie Cooper AM
Chair of the Environment Committee

Rt Hon Heidi Alexander MP
Secretary of State for Transport
Department for Transport
33 Horseferry Road
London
SW1P 4DR

(Sent by email)

4 December 2025

Re: Expansion of Heathrow and environmental impacts on Londoners

Dear Heidi,

I am writing following the London Assembly Environment Committee's meeting on 16 October 2025, where the Committee explored the environmental impacts of the proposed third runway at Heathrow, in the context of wider decisions around airport expansion in the London area.¹

The Committee remains deeply concerned about the proposals for an additional runway at Heathrow,² which could potentially increase the number of flights from 480,000 to 756,000 – many of which would fly directly over London.³ The impact of aircraft noise on many Londoners' quality of life is already too great, and any expansion would cause significant additional noise, air quality and climate impacts. In particular, the Committee believes that a new runway at Heathrow would:

- **Undermine progress made in London on air quality**, reversing recent improvements;

¹ London Assembly Environment Committee, [Environmental impacts of Heathrow expansion](#), October 2025

² Keith Prince AM does not support the recommendations of this letter, as he would like to see airport expansion as soon as possible.

³ Heathrow Airport, [Expanding Heathrow Policy Summary](#), July 2025

- **Conflict with London's and the UK's climate goals**, including London's target for reaching net zero by 2030 and the Climate Change Committee's advice on carbon budgets; and
- **Expose many more Londoners to harmful levels of aircraft noise**, with negative implications for health, wellbeing, and London's green spaces.

As I'm sure you're aware from your time as London's Deputy Mayor for Transport, the Mayor and London Assembly have long opposed a third runway at Heathrow.⁴ The Environment Committee has explored the environmental impacts of aircraft on several occasions over the past decade, and the overwhelming majority of the current Committee continue to be against the latest Heathrow third runway proposals, due to the harmful impacts on Londoners and the planet.⁵ We also note the House of Commons Environmental Audit Committee's (EAC's) recent findings that the Government has not yet demonstrated that airport expansion can be delivered in a way that is compatible with climate and nature targets.⁶ The Committee was able to speak with the Chair of the EAC, Toby Perkins MP, during our meeting, and we share many of the EAC's concerns.

A week after the Committee's meeting, you made an announcement outlining plans to publish an updated Airports National Policy Statement (ANPS) for consultation by summer 2026. This will include a review with "four key tests" that any proposed scheme for Heathrow expansion will have to meet.⁷ Getting the ANPS right will be vital to ensuring that the health and wellbeing of Londoners is not adversely affected by any changes. However, the lack of clarity around how the four tests for Heathrow expansion would be measured is of significant concern to the Committee.⁸ We are clear that any tests must be based on the best scientific evidence available, with the aim of avoiding further harm to Londoners and the environment, and the way in which they will be measured must be transparent.

Recommendation 1

Ahead of publishing the Airports National Policy Statement, the government should set out how its four tests for Heathrow will be measured and ensure these are reviewed by independent experts.

1. Air quality

While London has made considerable progress in reducing NOx emissions and some progress in reducing particulates since 2016,⁹ this should not be taken advantage of by Heathrow. Christina Calderato, Director of Strategy at Transport for London (TfL), made the point clearly in our meeting – that this progress should not be used as "headroom" to justify an expanded Heathrow.¹⁰ The UK's

⁴ Mayor of London, [New Flight Paths](#), MQ2025/2167 "I remain opposed to a third runway because of the severe impact it will have on noise, air pollution and meeting our climate change targets"; London Assembly Plenary Motion, [Third runway at Heathrow Airport](#), 19 July 2018

⁵ London Assembly Environment Committee, [Aircraft Noise](#), January 2019; London Assembly Environment Committee, [Letter to Heathrow Airport](#), May 2023

⁶ House of Commons Environmental Audit Committee, [Airport expansion and climate and nature targets](#). Fifth Report of Session 2024–26 HC 831

⁷ UK government, [Plans for Heathrow expansion accelerate as Transport Secretary unveils next steps](#), 22 October 2025

⁸ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p19

⁹ GLA, [London-wide Ultra Low Emission Zone One Year Report](#), March 2025 [Accessed 22 October 2025]

¹⁰ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p2

limits on NO_x remain higher than the most recent WHO guidelines, and if anything the UK's air quality standards on emissions of NO_x should be tightened further to reflect the latest research on health impacts.

TfL highlighted to us the importance of improving surface access to Heathrow to prevent additional congestion and air pollution from road vehicles.¹¹ Increasing the proportion of journeys to the airport made by public transport is a condition laid out in the current ANPS,¹² and must remain a priority.¹³

Further, we also heard that while the focus on emissions in relation to airport expansion has often been on land-based vehicles, there is emerging evidence about the impact of ultrafine particles (UFPs) from aircraft themselves. Celeste Hicks, Policy Manager at the Aviation Environment Federation (AEF), highlighted to us difficulties in identifying the source of UFPs at Heathrow due to its urban location, but told us that research by Dr Gary Fuller of Imperial College – based on research conducted at Gatwick airport where air pollution sources could be more easily isolated – indicates that aircraft themselves are a source of UFPs.¹⁴ This is highly concerning given the number of aircraft taking off and landing over London.¹⁵ She told us that these emissions have “flown under the radar, to use aviation terminology”, and are “not currently properly regulated and we do not know enough about them”.¹⁶

Recommendation 2

The Airports National Policy Statement should include targets for no additional air quality impacts from airports and include progressively tighter standards to lower emissions over time.

Recommendation 3

The government should ensure that the role of Ultrafine Particles (UFPs) from aircraft is properly assessed and included as part of the government's tests for its Airports National Policy Statement, and ensure that there is a systematic process for measuring around Heathrow and other London airports.

2. Climate impacts

On carbon emissions, we heard no compelling evidence that the expansion of Heathrow airport is consistent with the Mayor of London's target for reaching net zero by 2030. Christina Calderato, Director of Strategy at TfL, stated that it is “very difficult to see how you can reconcile that with that ambition and that pathway”.¹⁷ Indeed, expanding the number of flights is likely to go against the Mayor's target. While Heathrow claims that it is possible to expand and still be consistent with the

¹¹ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p2

¹² UK government [Airports National Policy Statement](#) June 2018 pp. 47-53

¹³ Surface access has been a focus of the London Assembly Transport Committee, who had a meeting on this topic and [wrote to Heathrow Airport in September 2025](#) on these points.

¹⁴ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p16

¹⁵ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.16

¹⁶ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.2

¹⁷ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.13

UK's net zero targets by 2050,¹⁸ the evidence we heard from other experts suggests that even this is unlikely to be the case.

The fact that airport expansion is being approved at many different London airports makes it difficult to see how this can be consistent with the UK's obligations. Celeste Hicks described this as looking like a "free-for-all on airport capacity".¹⁹ There needs to be a joined-up approach to ensure that increases in airport capacity do not mean that the UK breaches the environmental limits set out by the Climate Change Committee in its climate budgets.

Recommendation 4

As part of its updated Airports National Policy Statement, the government should take a national perspective on airport capacity and consider caps on overall flight numbers that keep emissions within the overall limits for emissions set by the Climate Change Committee.

We have also heard concerns that the aviation industry's plans for growth are moving faster than its ability to cut emissions. Paul Beckford of HACAN, a group that campaigns against the impacts of aircraft from Heathrow, told us that "the pace of technological delivery to decarbonise is not matched by the aspirations for growth that the sector has."²⁰

Sustainable Aviation Fuel (SAF) is the main tool the sector is reliant upon to decarbonise. Heathrow told us that they are expecting SAF to make up 3 per cent of total fuel usage this year, an increase of just 0.5 per cent on 2024.²¹ Additionally, as Toby Perkins MP, Chair of the EAC explained, the combustion of SAF in aircraft creates almost exactly the same emissions as kerosene.²² He highlighted to the Committee research by the Whittle Laboratory at the University of Cambridge, which questions whether there are overall carbon benefits of using SAF above 25 per cent of fuel usage.²³

The Committee has real concerns about whether the scenarios Heathrow is putting forward are realistic and thinks that these should be assessed independently and without optimism bias. The EAC has called for "the risk register for these innovations" to be published,²⁴ and we think it is vital that this is informed by independent research.

¹⁸ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 2](#), p.4 Matt Gorman (Director of Carbon Strategy, Heathrow Airport Ltd) "we can hit that emissions pathway with more growth than the CCC is projecting"

¹⁹ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.5

²⁰ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.10

²¹ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 2](#), p.5

²² London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 3](#), p.2

²³ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 3](#), p.3; House of Commons Environmental Audit Committee, [Airport expansion and climate and nature targets](#). Fifth Report of Session 2024–26 HC 831 Para 90, p.33 The report states that "beyond that point [25 per cent] the reductions became much less certain" due to "the likelihood of reducing availability of feedstocks for other sectors and moving beyond utilising 'waste' products and towards having to grow and cut down crops purely to serve the aviation sector."

²⁴ House of Commons Environmental Audit Committee, [Airport expansion and climate and nature targets](#). Fifth Report of Session 2024–26 HC 831 Para 90, p.39

Recommendation 5

The government should ensure that evidence on the climate impacts of Sustainable Aviation Fuel (SAF) is credible and that decisions on expanding its use are based on realistic scenarios and actual emissions from aircraft and real-world constraints rather than future technology and optimistic forecasts.

3. Noise

We heard during our meeting from HACAN, that expansion could result in “potentially doubling the number of people who are exposed to harmful levels of aircraft noise”.²⁵ Depending on the measures used, this could mean 2 million people in London are affected.²⁶

We heard that with any changes, there are already challenges around the concentration of flight paths or more dispersed impacts. Overall, the Committee think that the only way these impacts can be minimised is by not increasing the number of flights.

Where technological improvements can reduce noise impacts, these should be prioritised.²⁷ However, we are cautious about viewing increased mitigation as the solution. While double or triple glazing may help reduce noise impacts, it is also necessary to ensure that homes are liveable and properly ventilated, particularly with the increasing frequency of extreme heat events.²⁸

There is also the need to protect areas of tranquillity and London’s wild spaces from the disturbing impacts of aircraft noise. This includes areas such as Richmond Park, which is a Site of Special Scientific Interest (SSSI), but we are also aware of impacts on other green spaces, such as Kew Gardens and other green corridors in London.²⁹

We recognise that there is the potential for some positive changes from airspace change, which may mean reduced ‘stacking’ where aircraft have vertical holding patterns in the sky while they wait to land. However, new approaches may mean that, as HACAN pointed out, there is a risk that some new technologies mean that “communities that are overflown get a greater intensity of noise, more frequently, and more exposure to that noise pollution.”³⁰ This should be avoided if possible.

We are also aware of the potential that many parts of London that currently do not experience significant amounts of aircraft noise may see this change in future, and that the health impacts of changes in noise exposure are not fully understood.³¹ As we have highlighted in previous reports on this topic, stacking, low-level overflying, and overlapping flight paths should be minimised.

²⁵ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.1

²⁶ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.19. If using the 51 decibels lowest observable adverse effect level.

²⁷ The Committee note that in evidence to the Environmental Audit Committee, the London Borough of Hillingdon stated that the noise level at which insulation is provided to households remains too high. House of Commons Environmental Audit Committee, [Airport expansion and climate and nature targets](#). Fifth Report of Session 2024–26 HC 831 Para 57, p.23

²⁸ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.14

²⁹ London Assembly, [Plenary Motion](#), 2 November 2023

³⁰ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.7

³¹ London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p.1

Restrictions on night flights and limits on early morning flights should also be retained, and preferably strengthened.³²

Recommendation 6

In the Airspace change process, London's green spaces and other areas of tranquillity should be protected from noise disturbance. When designing airspace, providing respite for communities and bans on night flights should be retained.

4. Consultation

Given the scale of potential impacts in the skies over London, it is vital that the voices of Londoners are meaningfully considered in any future decisions regarding Heathrow or other airports serving the capital. Your planned review of the Airports National Policy Statement should be an opportunity for ensuring that those affected by aircraft – both now and in the future – are adequately consulted and have the chance to understand the changes and inform any decisions.

Recommendation 7

Any update to the Airports National Policy Statement should formalise the consultation process for people potentially affected by airport expansion, including formal roles for the Council for Independent Scrutiny of Heathrow Airport (CISHA) and the London Assembly, ensuring that Londoners have an informed and meaningful opportunity to ask questions and share their views.

The Committee would welcome a response to this letter by 12 February 2026. Please send your response by email to the Committee's Clerk, Saleha Fazal (Saleha.Fazal@london.gov.uk).

Yours,



Léonie Cooper AM
Chair of the Environment Committee

³² London Assembly Environment Committee, [Aircraft Noise](#), January 2019