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Chair of the Environment Committee

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(Sent by email)

28 August 2026

Re: Heathrow Expansion National Policy Statement consultation

Dear Heidi,

As the Chair of the London Assembly Environment Committee, I am writing in response to the consultation into the Heathrow Expansion National Policy Statement (HENPS), which sets out the Government's rules and tests for assessing any future application to build a third runway at Heathrow Airport.¹

The Committee has scrutinised the impacts of aircraft on London for many years, expressing significant opposition and concern over proposals for an expanded Heathrow Airport.² In the Committee's letter to you in December 2025, we recommended that the Government's four 'tests' for an expanded Heathrow should be transparent and based on the best scientific evidence available, with the aim of avoiding further harm to Londoners and the environment.³ These tests have now

¹ Department for Transport [Heathrow Expansion National Policy Statement \(HENPS\)](#) June 2026

² This includes multiple letters and reports on the topic, including submissions to the Airports Commission in [2013](#) and [2015](#), detailed reports - including [Flights of Fancy](#) (2010), [Plane Speaking](#) (2012), [Aircraft Noise](#) (2019), and further letters highlighting concerns in [2019](#), [2023](#), and [2025](#).

³ London Assembly Environment Committee [Letter on Heathrow expansion](#) December 2025

been set out in the HENPS. However, we remain concerned that significant gaps remain between the evidence of harms from aircraft that the HENPS identifies and the content of the tests, which need to be strengthened further before any decision on Heathrow expansion is taken.⁴

The HENPS also states that Heathrow Expansion will be treated as Critical National Growth Infrastructure (CNGI), meaning that “a presumption in favour of granting consent for CNGI will apply and it is unlikely that consent will be refused on the basis of residual impacts.”⁵ While the mitigation hierarchy would still apply, and the four tests would need to be met, this reinforces to us the need for these tests to be robust.

Aircraft noise is already having detrimental impacts on many Londoners’ quality of life, and we have concerns about ongoing noise, air quality and climate impacts. On each of these, we set out our concerns in relation to the proposals in the published draft HENPS.

1. Air quality

We are concerned the mitigations around air quality in the HENPS are insufficient. As we pointed out in our December 2025 letter, London has made considerable progress in reducing NOx emissions and some progress in reducing particulates since 2016 from road transport.⁶ The HENPS sets out that there is a real risk that this progress will be undermined, stating “the trend towards heavier aircraft, and increased activity due to a runway expansion means that long-term adverse air quality effects cannot be ruled out”.⁷

The HENPS focuses on potential mitigations and uses as a test whether current UK legal limits are breached or worsened. However, we fear this does not go far enough given the UK’s limits on NOx remain higher than the most recent World Health Organization (WHO) guidelines. The Committee repeatedly heard from experts at our Environmental Stocktake meeting in February 2026 how the UK’s air quality standards should be tightened further to reflect the latest research on health impacts.⁸

London already has air quality targets which are more stringent than the rest of the UK. The Mayor of London has set a target of meeting the WHO’s interim target of 10ug/m³ for PM_{2.5} by 2030 and the final guidelines for NO₂ and PM_{2.5} as soon as possible.⁹ The HENPS should reflect this ambition to lower health impacts and include a trajectory towards achieving WHO levels.

⁴ Keith Prince AM does not endorse the conclusions and recommendations of this letter as he would like to see airport expansion as soon as possible.

⁵ Department for Transport [Proposed draft revision to the Airports National Policy Statement – To be known as the Heathrow Expansion National Policy Statement](#) June 2026 para 4.18 p36

⁶ London Assembly Environment Committee [Letter on Heathrow expansion](#) December 2025; GLA, [London-wide Ultra Low Emission Zone One Year Report](#), March 2025 [Accessed 22 October 2025]

⁷ Department for Transport [Proposed draft revision to the Airports National Policy Statement – To be known as the Heathrow Expansion National Policy Statement](#) June 2026 para 5.8 p57

⁸ London Assembly Environment Committee [Transcript of meeting on 3 February 2026](#), p3

⁹ Mayor of London [Air Quality](#) Accessed 20 July 2026

In our December 2025 letter we also highlighted the issue of Ultrafine particles (UFPs), following concerns raised by experts about their potential to cause respiratory and cardiovascular damage.¹⁰ We are therefore pleased to see the recognition of the potential impacts of ultrafine particles in the HENPS – including the publication of a literature review which summarises the evidence base.¹¹

The literature review confirms that this is an issue that requires urgent attention, particularly due to “their ability to penetrate biological systems and contribute to adverse health outcomes”.¹² It also confirms that “research has consistently demonstrated that airports, including Heathrow, are major sources of UFPs”, and acknowledges that “regulatory frameworks lack specific guidelines for UFP concentrations, and existing monitoring networks are limited in scope”.¹³ However, given this literature review also clearly sets out the risks, the requirement in the HENPS to monitor “emerging pollutants of concern such as UFP[s]”¹⁴ does not go far enough. It must also include action to mitigate the impacts and ensure it is compatible with any future guidelines on UFPs.

Recommendation 1

The Heathrow Expansion National Policy Statement should include targets and a timeframe to reduce air quality impacts to achieve current WHO guidelines.

Recommendation 2

The Heathrow Expansion National Policy Statement needs to specify that as well as measuring the impact of Ultrafine Particles (UFPs), work should be undertaken to mitigate the impacts, particularly as new evidence and international guidelines emerge.

2. Climate impacts

We question whether the UK can achieve meaningful reductions in aviation emissions alongside an expanded Heathrow. While there will be some reductions in carbon emissions from efficiency improvements, Sustainable Aviation Fuel (SAF) is the main tool the aviation sector is reliant upon to decarbonise. As outlined in our previous letter, the evidence does not yet demonstrate that SAF and carbon offsetting can achieve the levels required.¹⁵ The HENPS appears to acknowledge this — setting aside whether or not individual Members of the Committee support them— indicating that

¹⁰ London Assembly Environment Committee [Letter on Heathrow expansion](#) December 2025; London Assembly Environment Committee, [Transcript of meeting on 16 October 2025, panel 1](#), p16

¹¹ AECOM/Department for Transport [Air quality support for review of ANPS: ultra-fine particulates literature review](#) June 2026

¹² AECOM/Department for Transport [Air quality support for review of ANPS: ultra-fine particulates literature review](#) June 2026, p11

¹³ AECOM/Department for Transport [Air quality support for review of ANPS: ultra-fine particulates literature review](#) June 2026 p11

¹⁴ Department for Transport [Proposed draft revision to the Airports National Policy Statement – To be known as the Heathrow Expansion National Policy Statement](#) June 2026 para 5.27 p62

¹⁵ London Assembly Environment Committee [Letter on Heathrow expansion](#) December 2025

there will be challenges to even achieve the Government's net zero targets for 2050, and will be reliant on greenhouse gas removals, and committing to an updated Jet Zero strategy.¹⁶

We consider that there is a real risk that these future reductions and removals will not be delivered, something that the Climate Change Committee has also observed in its most recent progress report.¹⁷ Decisions should be based on currently deliverable solutions, and there needs to be a mechanism to limit any increases in aircraft numbers to align with actual emissions reductions achieved.

Recommendation 3

The Heathrow Expansion National Policy Statement needs to be less reliant on Sustainable Aviation Fuel and carbon removals, and include a mechanism to limit any increase in aircraft movements to align with actual emissions achieved.

3. Noise

Aircraft noise causes significant annoyance to Londoners and health impacts.¹⁸ We therefore welcome that the HENPS includes a requirement for regular periods of respite, runway alternation, a night flight ban, and mitigation measures to reduce the impacts on communities.¹⁹

However, the HENPS is based on an indicative airspace design and does not include details of the final proposed flightpaths.²⁰ Given these uncertainties, there is a very real risk that new flightpaths could lead to some communities being overflown more intensely and with greater exposure to harmful levels of noise. There are also potential cumulative impacts from additional flights from other nearby airports which may cause more overlapping flight paths which should also be included in noise assessments.

The HENPS also estimates that improvements in technology will result in reductions in aviation noise in the order of 35 per cent by 2035 compared to 2019. Based on this, the HENPS includes the requirement that any scheme must "avoid significant adverse impacts on health and quality of life

¹⁶ Department for Transport [Proposed draft revision to the Airports National Policy Statement – To be known as the Heathrow Expansion National Policy Statement](#) June 2026 para 5.65 p71

¹⁷ Climate Change Committee [Progress in reducing emissions 2026 report to Parliament](#) June 2026 "Delivery of engineered removals is a high risk to achieving the carbon budgets."

¹⁸ The HENPS recognises the findings of the recent Aviation Night Noise Effects study (ANNE) that identifies that people are more annoyed by aviation noise and at lower levels than previous evidence indicated. Department for Transport [Proposed draft revision to the Airports National Policy Statement – To be known as the Heathrow Expansion National Policy Statement](#) June 2026 para 5.30, p62

¹⁹ Department for Transport [Proposed draft revision to the Airports National Policy Statement – To be known as the Heathrow Expansion National Policy Statement](#) June 2026 para 5.55, p68-69

²⁰ Department for Transport [Proposed draft revision to the Airports National Policy Statement – To be known as the Heathrow Expansion National Policy Statement](#) June 2026 para 5.38, p64

from noise by limiting, and where reasonably possible, reducing overall aircraft noise compared to 2024".²¹

We are disappointed that these technological improvements are being used to expand the number of flights and not to reduce the existing levels of noise. This will prolong the serious health impacts from noise affecting many Londoners living under Heathrow flight paths. There should instead be a commitment in HENPS to reducing overall noise impacts and expanding respite periods.

Recommendation 4

The Heathrow Expansion National Policy Statement does not go far enough in dealing with aircraft noise – given technology improvements, it should aim to reduce overall noise impacts rather than just limiting to 2024 levels and expand respite periods further.

Overall, the Committee continue to have significant concerns about the environmental impacts of proposals for an expanded Heathrow. We also note the fact that overall economic benefits of the scheme are expected to be negative,²² and provide a boost to GDP of just 0.05 per cent.²³ This will make many question whether its inclusion as Critical National Growth Infrastructure is justified and whether the scheme is worth it overall, given the scale of the impacts on Londoners and the environment.

Yours,



Gareth Roberts AM
Chair of the Environment Committee

²¹ Department for Transport [Proposed draft revision to the Airports National Policy Statement – To be known as the Heathrow Expansion National Policy Statement](#) June 2026 para 5.55, p68

²² Department for Transport [Heathrow Expansion Appraisal Report](#) June 2026, p46 Table shows negative net benefits of between £23.4 billion and £62.5 billion.

²³ Department for Transport [Heathrow Expansion Appraisal Report](#) June 2026 p55, para 11.11