

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

28 August 2026

Draft Heathrow Expansion National Policy Statement: consultation on proposed amendments

Dear Minister,

We write as Leaders of London and neighbouring boroughs to register our strong opposition to the plans now under consideration through the draft Heathrow Expansion National Policy Statement (HENPS).

Our councils collectively represent around 1,724,464 people and have long worked together, on a cross-party basis, to protect residents from the environmental, health and quality-of-life impacts of Heathrow expansion. We are not anti-Heathrow. We recognise the airport's economic significance and the importance of strong international connectivity. But we do not accept that a third runway, whether full length or shorter, is either necessary or acceptable when the consequences for Londoners and neighbouring communities remain so profound and unresolved.

The Government's consultation rightly identifies economic growth, noise, air quality and climate change as the four tests any proposal must meet. On the evidence available, Heathrow expansion fails those tests. It would expose more residents to aircraft noise compared to a two-runway operation, worsen pressure on air quality, add significant carbon emissions, require major and costly surface access interventions, and place communities across west, south-west and inner London under new or intensified flight paths.

We are also concerned that the draft HENPS is not a neutral framework for assessing Heathrow expansion. The consultation document appears to begin from the assumption that expansion should proceed, rather than genuinely testing whether a third runway remains necessary, proportionate or preferable to less harmful alternatives. In particular, the proposal to designate Heathrow expansion as Critical National Growth Infrastructure risks prejudging any future Development Consent Order application by placing substantial weight on expansion before the consultation has

concluded and before unresolved concerns relating to noise, air quality, climate impacts and public health have been addressed. This undermines confidence that affected communities are being offered a genuinely balanced consultation process.

For many of our residents, the issue is not abstract national infrastructure policy. It is the daily reality of aircraft noise over homes, schools, parks and town centres; disturbed sleep from early morning and late-night flights; concern about pollution on already congested roads; and the prospect that hard-won protections such as runway alternation and respite could be weakened or lost.

Noise and quality of life

Heathrow already has a serious and well-documented noise impact on local communities. Any expansion would mean hundreds of thousands of additional aircraft movements each year, with consequences far beyond the airport boundary.

It is not credible to ask residents to accept more flights on the basis of general assurances that future aircraft may be quieter. Noise impacts should not be assessed solely through averaged contour measurements or comparisons with a 2024 baseline. What matters to residents is how often aircraft pass overhead, when they do so, whether flights are concentrated over particular communities and whether predictable periods of respite are maintained. Aircraft noise should be judged by the lived experience of communities, not simply by airport-wide averages.

The final policy statement must protect and strengthen, not dilute, existing noise protections. That means maintaining meaningful runway alternation, preserving predictable periods of respite, reducing the overall number of people exposed to harmful aircraft noise, and delivering a genuine reduction in night flights.

A meaningful night-flight regime must be based on actual aircraft movements rather than scheduled operations alone and must address early arrivals, delayed departures and the acute disturbance experienced by residents during the early morning period. A 6.5-hour restriction that broadly mirrors existing arrangements should not be presented as a significant new safeguard.

Air quality and public health

Expansion would generate additional road traffic, freight movements, construction activity and airport-related journeys in areas that already face significant congestion and air quality challenges.

Boroughs have been working with ambitious targets to improve air quality across the London and the surrounding area, and these improvements should not be considered as providing 'headroom' for the environmental impacts of Heathrow expansion.

Any policy framework must require full legal compliance on air quality and not shift the burden of mitigation onto local authorities or residents.

We are also concerned that the draft HENPS does not require explicit assessment and monitoring of ultrafine particles, an emerging aviation-related pollutant for which there is currently limited baseline evidence and no adequately developed monitoring framework. The final policy statement should require transparent assessment, monitoring and reporting of ultrafine particle exposure.

Climate change and carbon targets

The UK has legally binding carbon targets. Heathrow expansion would create substantial additional aviation emissions and would lock in new demand for decades. It is not enough for the policy statement to rely on optimistic assumptions about future technology, sustainable aviation fuels or offsetting. The planning framework must demonstrate, clearly and independently, that any proposal is compatible with carbon budgets and net zero obligations before support is given.

In our view, the Government has not yet shown that a third runway can be reconciled with those obligations. Expansion risks undermining climate commitments at the same time councils are asked to do more to reduce emissions and build healthier places.

The economic case and alternatives

The economic case for Heathrow expansion must be tested rigorously and transparently. The Government's own appraisal evidence suggests only a marginal GDP uplift of around 0.05 per cent by 2056, while identifying substantial social and environmental costs. Claims about growth, jobs and connectivity must therefore be assessed alongside their impacts on residents' health, quality of life, air quality, climate obligations and public infrastructure. The economic case should be judged on net public value rather than headline growth claims alone.

Our councils have consistently argued that better use of existing airport capacity, expansion already approved at other UK airports, improved rail connectivity, demand management measures and a greater shift from domestic aviation to rail should all be fully evaluated before any irreversible decision for a new runway.

The Government has not yet demonstrated why additional capacity must be provided at Heathrow rather than delivered through a more balanced national aviation strategy.

Surface access and infrastructure impacts

Expansion cannot be considered in isolation from the transport system needed to support it, and we are supportive of improved surface access to the airport. Millions of additional passengers and workers would place further pressure on the existing public transport and road network across London and the wider south east. The costs and deliverability of the necessary surface access improvements must be fully identified, funded and agreed before any policy support is finalised.

Local communities should not bear the consequences of an expansion scheme whose wider infrastructure needs are unresolved. Nor should local roads, rail services and public transport networks be left to absorb additional demand without enforceable guarantees, clear funding and independent oversight.

Community confidence and enforceable safeguards

Our residents have heard many promises over many years about quieter aircraft, cleaner operations, better compensation and improved mitigation. Too often, those assurances have not matched people's experience. If Government proceeds with this policy framework, any conditions must be specific, measurable, independently monitored and legally enforceable. Aspirational commitments are not enough.

That should include binding protections on night flights, noise exposure, respite, air quality, surface access, carbon impacts, community compensation and health monitoring. The burden of proof must sit with the promoter of expansion, not with residents and councils forced to challenge inadequate mitigation.

Conclusion

For these reasons, we urge the Government not to proceed with a policy statement that gives renewed support to Heathrow expansion. The consultation has not demonstrated that expansion satisfies the Government's own tests and has not resolved fundamental concerns regarding noise, air quality, climate obligations, public health, surface access or community confidence in the decision-making framework.

Nor does it provide sufficient reassurance to the millions of residents represented by our councils that their health, environment and quality of life will be protected.

London and the south east needs cleaner air, quieter skies, reliable public transport, credible climate leadership and infrastructure decisions that command public confidence. Heathrow expansion would make those goals harder, not easier, to achieve.

We therefore call on Government to withdraw support for Heathrow expansion and to work with London and neighbouring boroughs, affected communities, environmental groups, transport bodies and business representatives on a more sustainable aviation and connectivity strategy for the capital and the country.

Yours sincerely,



Cllr Gareth Roberts
Leader, Richmond upon Thames Council



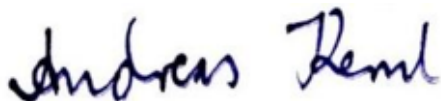
Cllr Robert Morritt
Leader, Wandsworth Council



Cllr James McAsh
Leader, Southwark Council



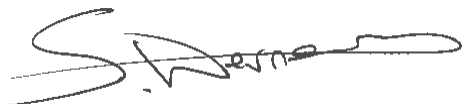
Cllr Steve Tuckwell
Leader, Hillingdon Council



Cllr Andreas Kirsch
Leader, Royal Borough of Kingston upon
Thames



Cllr Barry Lewis
Leader, Sutton Council



Cllr Simon Werner
Leader, Royal Borough of Windsor and
Maidenhead