Heathrow West Limited
World Business Centre 2
Newall Road
London Heathrow Airport
Hounslow, TW6 2SF

[redacted]

Head of the Transport Infrastructure Planning Unit

By email: [redacted]

Cc: [redacted]

Cc: [redacted]

Cc: [redacted]

Cc: [redacted]

Cc: [redacted]

16th February 2026

Heathrow West Terminal (the Project)

Request for Section 35 Direction (the Request)

Planning Act 2008 (the Act)

1.1 Thank you for your letter received on 11 February 2026 requesting further information in respect of the Request (the **Second RFI**).

1.2 The Second RFI is subsequent to an initial request for further information sent by you on 6 January 2026 (the **RFI**). We provided a response to the RFI on 19 January 2026 (the **RFI Response**).

1.3 As was set out in the Request – and reemphasised in the RFI Response – the Request was submitted in December 2025 so that HWL will have absolute certainty that the Principal Development will be classified as nationally significant and so that we can proceed with a DCO application at a speed to be able to meet the Government's stated objective of enabling a decision on such application to be made this Parliament (i.e., by July 2029).

1.4 HWL respectfully notes that the matters set out in the Second RFI could have been included in the RFI – or indeed relayed to HWL earlier, particularly given that the Request was made on 17 December 2025, some 8 weeks ago. HWL is keen to proceed with its DCO application as soon as possible and is concerned by the delay in determination of the Request by the repeated requests for further information.

1.5 We have set out below a response to those matters raised in the Second RFI. Capitalised terms have the meaning given to them in the Request or the RFI, unless otherwise defined in this letter.

2. RESPONSE TO THE SECOND RFI

2.1 The Second RFI requests more detail on the following information:

"● *Confirm if the 40mppa is an increase in capacity and whether this relates to the proposed new terminal as well as the proposed airfield expansion.*

● *Assuming this does, please can you provide more detail on how this figure was calculated.*

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● *Noting the Principle Development* [sic] *does not include proposals for a runway, please can you provide more detail on whether there is considered to be runway capacity for an additional 40mppa?*"

2.2 As an overriding comment, before responding to each of your requests, the Secretary of State does not need to make a finding on the capacity of the Principal Development to determine that it is of national significance. In our view, the national significance of a new passenger terminal at the country's – and indeed, one of the world's – busiest airports is self-evident.

2.3 In response to the first request: the 40mppa increase in capacity relates to the proposed new terminal, which includes the satellite pier attached to the terminal building. The expansion of the existing airfield around the terminal as identified as the other elements of the Principal Development would support the new terminal's capacity (i.e. the stands, apron and taxiway).

2.4 In response to the second request: the figure has been calculated as follows:

2.4.1 HWL has been advised by IAG and its consultants that each Code C aircraft stand (or narrow body equivalent (NBE)) aircraft stand can accommodate approximately 800,000 annual passengers;

2.4.2 the proposed apron layout for the proposed terminal is designed with a total of 52 Code C (NBE) apron stands (with two stands being contingency) as shown on **Figure 1** below, thereby resulting in the Principal Development being capable of accommodating 40mppa;

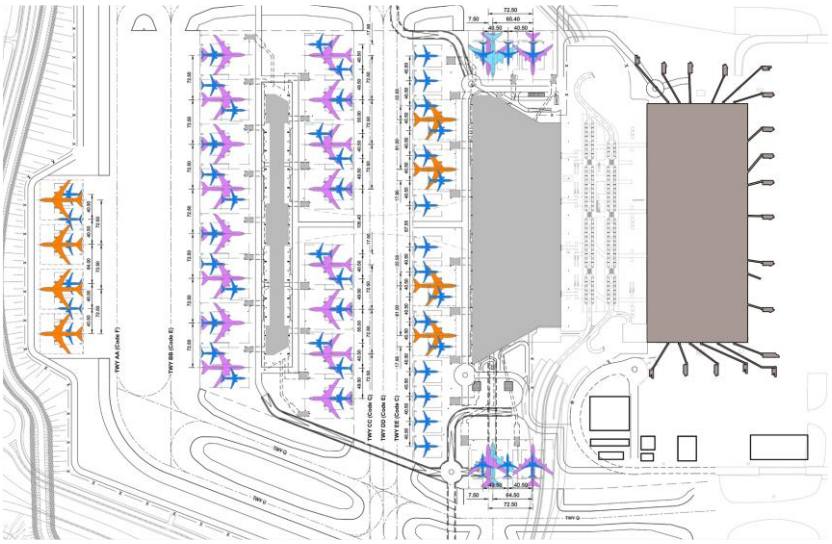


Figure 1: Proposed Aircraft Parking Stand Layout

2.4.3 in terms of the terminal building itself, this is being designed to allow approximately 11,000m^2 per mppa and so will have a total floor area of approximately 440,000m^2 and, therefore, will be capable of accommodating 40mppa.

2.5 In response to the third request: as was set out in the Request, the Principal Development forms part of the wider expansion at Heathrow supported by the ANPS. This wider expansion will deliver a third runway, which will create capacity in excess of 40mppa.

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3. DETERMINATION OF THE REQUEST

3.1 HWL is cognisant that in order to grant the Request, the Secretary of State needs to be satisfied that the Principal Development:

3.1.1 is or forms part of a project (or proposed project) in the field of transport;

3.1.2 will (when completed) be wholly in England; and

3.1.3 **is a project (or proposed project) is of national significance, either by itself or when considered with one or more other projects (or proposed projects) in the same field (i.e. transport)**.

3.2 We do not repeat the representations made in the Request and RFI Response which clearly articulate how the Principal Development (and wider Project) is a project of national significance in and of itself but also clearly when considered with the proposed delivery of a third runway by HAL.

3.3 HWL also respectfully notes that the capacity of the proposed terminal is irrelevant to determining the Request insofar as it is not necessary for HWL to show that the Principal Development is a nationally significant infrastructure project[1] – as "airport-related development" or otherwise – to satisfy the Secretary of State that she should grant the Request. The Secretary of State needs to satisfy herself that the Principal Development is of national significance; not that it is a nationally significant infrastructure project.

4. CONCLUSION

4.1 We trust that this response – together with the information in the Request and RFI Response – provides the Secretary of State with sufficient information to be able to determine the Request. **Please let us know as soon as possible if you require any further information.**

4.2 HWL considers that the information provided to the Secretary of State plainly demonstrates the national significance of the Principal Development (and the wider Project).

4.3 We look forward to hearing from you as soon as possible and would expect that the Secretary of State now has sufficient information to enable her to issue a final decision within seven days of receipt of this letter.

4.4 If you require any further details, please do not hesitate to contact [redacted] ([redacted]).

Yours sincerely,

[redacted]

CEO – Heathrow West Limited

[1] As set out in the Request and RFI Response, HWL considers that it is.