



Department
for Transport

AECOM

Equality Impact Assessment (EqIA) for the draft Heathrow Expansion National Policy Statement

Main Report

Department for Transport



Quality information

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1. Introduction

Purpose

- 1.1.1 The Department for Transport (DfT) has commissioned AECOM to produce an Equality Impact Assessment (EqIA) to inform the Government's review of the Airport National Policy Statement (ANPS). As announced by the Secretary of State for Transport in November 2025¹, the scheme put forward by Heathrow Airport Limited for a Northwest Runway at Heathrow Airport will inform the review. Thus, the ANPS has been renamed the Heathrow Expansion NPS, reflecting that the document does not reconsider the appropriate location for additional runway capacity in the South East of England decided in the 2018 Airports NPS. Instead, the Government has considered whether there remains a strong case for expanding hub capacity at Heathrow, via the Heathrow Northwest Runway scheme, that it can meet its four tests and that the requirements it places on an applicant are robust and up to date.
- 1.1.2 As a public body, DfT must, in the exercise of its functions have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and promote equality and cohesion between those with protected characteristics² and all others in the manner described at section 149 of the Equality Act 2010. This duty is referred to as the 'public sector equality duty' (PSED).
- 1.1.3 An EqIA was carried out when the ANPS was first developed and therefore should be updated to reflect any proposed amendments. The EqIA provides a systematic assessment of how the Heathrow Expansion NPS may affect groups with protected characteristics as defined by the Equality Act 2010 and demonstrates how the aims of the PSED have been considered through relevant mitigating measures. An EqIA will support decision-making on the basis of an informed, evidenced understanding of relevant equality issues.
- 1.1.4 The purpose of this EqIA is to assess the Heathrow Expansion NPS and consider whether, and how, the proposals may have equalities impacts in line with the aims or arms of the PSED (see Chapter 3 for more details). This will inform the ANPS review and the development of the revised NPS.
- 1.1.5 In doing so, it builds on the previous EqIA prepared for the ANPS in 2018 reviewing and updating of relevant evidence on protected characteristic groups, study areas, priority groups, and the screening and assessment methodology.

Context

- 1.1.6 National Policy Statements (NPS) are designated under the Planning Act 2008 to set out policy that must be taken into account in the design of that

¹ Department for Transport (25 November 2025). Written statement to Parliament. Heathrow expansion: selection of a scheme for ANPS review purposes. Available here: [Heathrow expansion: selection of a scheme for ANPS review purposes - GOV.UK](#)

² Protected characteristics are defined under the Equality Act 2010: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and marriage/civil partnership.

description of development when determining Development Consent for Nationally Significant Infrastructure Proposals (NSIP).

- 1.1.7 The current ANPS, designated in June 2018³ under the Planning Act 2008, sets out the UK Government's policy framework for delivering additional runway capacity in the Southeast of England. The ANPS sets out that additional capacity is best met by a Northwest runway at Heathrow Airport, and the requirements that need to be met for a new Northwest runway to gain Development Consent. These requirements also apply to 'associated development', such as terminal infrastructure, road and rail links. They are a material consideration for other airport infrastructure in London and the Southeast of England. In January 2025, the Government confirmed support for a third runway at Heathrow Airport and invited proposals to be brought forward by Summer 2025.
- 1.1.8 The 2018 ANPS outlines the Government's case for additional airport capacity in the Southeast of England. It highlights that Heathrow and other London airports are operating near full capacity, limiting connectivity and resilience. The growing demand for air travel is projected to continue, and without expansion, the UK risks losing routes to emerging markets and its economic competitiveness. The Government concludes that a new Northwest runway at Heathrow is the most effective solution to meet future demand, while ensuring environmental and community impacts are managed responsibly.
- 1.1.9 The 2018 ANPS confirms that the Airports Commission identified the need for one additional runway to be in operation in the Southeast of England by 2030 in its 2013 Interim Report.⁴ The Airports Commission shortlisted three schemes for Appraisal of Sustainability: a new full-length second runway at Gatwick Airport; a new full-length Northwest runway at Heathrow Airport; and an extension of the existing northern runway at Heathrow Airport.
- 1.1.10 The 2018 ANPS outlines the Airports Commission appraisal and consultation process, including the Appraisal Framework. The Framework was designed as part of the appraisal process in 2014 comprising detailed appraisal objectives originating from the eight sift criteria used to shortlist the three schemes: strategic fit; economy; surface access; environment; people; cost; delivery and operational.⁵
- 1.1.11 The 2018 ANPS outlines the outcomes of the Appraisal of Sustainability for these shortlisted schemes. The Final Report, produced in 2015 by the Airports Commission, concluded that the Northwest runway at Heathrow Airport would offer the strongest strategic and economic benefits to the UK, accompanied by supporting measures to address the environmental and community impacts of the new runway. The Government supported the conclusions of the Airports Commission and endorsed the proposed Northwest runway at Heathrow as its preferred scheme.

³ Department for Transport (2018). Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England. Available at: [Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England](#)

⁴ Airports Commission (2013). Airports Commission: Interim Report. Available at: [Airports Commission: interim report - GOV.UK](#) [accessed 16/01/2026]

⁵ Airports Commission (2015). Airports Commission: Final Report. Available at: [Airports Commission: final report](#) [accessed 16/01/2026]

1.1.12 Although the 2018 ANPS is current Government policy and continues to support a third runway, the Government has acknowledged the need for review following submission of proposals for a third runway in summer 2025. This is to ensure the ANPS remains fit for purpose, reflecting latest legislation and policy, and aligns with the Government's commitments to the appropriate development of additional airport capacity at Heathrow Airport. This review requires an Appraisal of Sustainability and will be subject to public consultation, and Parliamentary scrutiny and approval. The review will consider how any proposed scheme must meet the Government's four tests:

- It contributes to economic growth across the country;
- It meets our air quality obligations;
- It is consistent with our noise commitments; and
- It aligns with our legal obligations on climate change, including net zero.

Heathrow Expansion

1.1.13 The revised ANPS focuses on the expansion of Heathrow, in line with the Chancellor's announcement in January 2025. Accordingly, the Airports NPS has been renamed the Heathrow Expansion NPS (hereafter referred to as "the HENPS") to reflect that the document does not reconsider the strategic location of additional runway capacity, and to clarify that the document was, and continues, to have direct effect in relation to the provision of a Northwest Runway at Heathrow Airport only.

1.1.14 The Government supports the expansion at Heathrow to deliver potential benefits for passengers, staff, airlines, local communities and businesses in the neighbouring area and wider country. According to Heathrow Airport Limited⁶, the scheme informing the ANPS review includes the following proposals:

- An up-to 3,500-metre third runway located Northwest of the airport delivering core capacity uplift required to meet national demand and need; 276,000 additional flights per year reaching up to a total of 756,000 per year;
- A new terminal complex to the West of Terminal 5, modernised Central Terminal Area and extended Terminal 2, increasing overall capacity up to 150 million passengers per year;
- Upgrading and modernising existing infrastructure including increasing cargo capacity by 50%, reconfiguring surface access, the realignment of the M25 motorway below the new runway and parking facilities;
- Expanded Public Transport Interchange within the Central Terminal Area to improve access to public transport across the airport and delivering high-capacity, low-carbon travel options; including bus priority lanes in the new Southern Road Tunnel and walking and cycling infrastructure; and
- Phased closure of Terminal 3, which is Heathrow's oldest terminal.

⁶ Heathrow Airport Limited (2025). Our proposal for expanding Heathrow. Available at: [Expanding-Heathrow-proposal-summary-31-07-25.pdf](#)

1.1.15 The UK Government has set targets to make a decision on development consent for expanding Heathrow by 2029 and enabling delivery of an operational third runway by 2035. According to Heathrow Airport Limited⁷, Heathrow expansion is expected to deliver outcomes as per Table 1-1. As part of the ANPS review, the Government is carrying out its own analysis of the expected outcomes.

⁷ Heathrow Airport Limited (2025). Our proposal for expanding Heathrow. Available at: [Expanding-Heathrow-proposal-summary-31-07-25.pdf](#)

Table 1-1: Heathrow expansion expected outcomes (according to Heathrow Airport Limited)

Economic growth	Expanding Heathrow would add 0.43% to UK GDP by 2050, create thousands of jobs and enable even more businesses across the UK to access the global economy through Heathrow. ⁸
Opportunities for the UK	Increasing capacity will deliver more supply chain opportunities, domestic connectivity, inward investment and inbound tourism across the country; 60% of the economic benefit will be felt by communities outside London and the Southeast.
Environmental commitments	Expanding Heathrow will contribute towards reaching net zero by 2050.
Local communities	Heathrow is the largest single-site employer in the UK, supporting over 800,000 jobs. Expanding Heathrow would deliver local economy growth, jobs and skills to those living closest to the airport.
Passengers and airlines	Passenger benefits delivered through more direct aviation links and lower air fares; and growth potential for airlines delivered through the opportunity to operate to more destinations and increase passenger capacity.
Value for money	The Heathrow expansion will be privately financed to deliver value for money to customers.

Report structure

1.1.16 Following on from this introduction section, the remainder of the report is structure as follows:

- **Chapter 2:** Approach to the EqlA - setting out the process and methodology for assessing impacts;
- **Chapter 3:** Policy and legislation review - providing context through relevant national, regional and local policy and legislation associated with equalities and planning;
- **Chapter 4:** Evidence review - comprises a capture of all relevant and current evidence for the update of the EqlA, including demographic data and key equality issues;
- **Chapter 5:** Assessment of impacts - sets out the assessment of impact by theme and for priority groups.
- **Chapter 6:** Conclusions - summarises the key findings of the EqlA and how DfT has paid due regard to the three limbs of the PSED in developing the HENPS.
- **Appendix A:** A detailed demographic profile of the study area including data from the Census 2021 and Index of Multiple Deprivation 2025 on

⁸ Frontier Economics (2025). Heathrow Expansion Benefits: Executive Summary. Available at: [Heathrow-Net-Benefits-Summary-29-01-2025-STC.pdf](#)

protected characteristics, socioeconomics, and local services and amenities.

- **Appendix B: EqIA screening**
- **Appendix C: Summary of impacts by protected characteristic group**

2. Approach

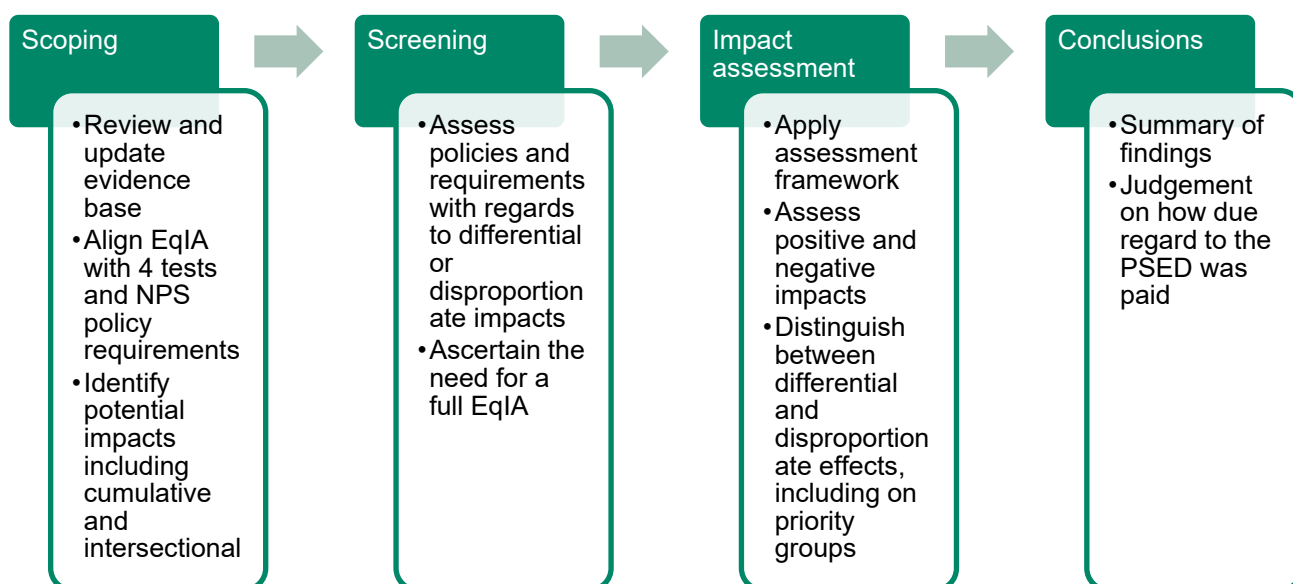
Introduction

2.1.1 The section sets out the approach to undertaking the EqlA for the draft HENPS. In line with the draft HENPS, the assessment considers the potential equality impacts in relation to:

‘The delivery of additional airport capacity through the provision of a Northwest Runway at Heathrow Airport. It also applies to proposals for any new terminal infrastructure or reconfiguration of terminal facilities associated with the Heathrow Northwest Runway at Heathrow Airport’.

2.1.2 The assessment then examines how the specific policies within the draft HENPS influence these impacts. The draft HENPS policies act as mitigation measures by setting the standards, assessment requirements and design expectations that an applicant must meet at the DCO stage. The EqlA therefore assesses both the potential impacts of the expansion and the extent to which the draft HENPS policies help to avoid, reduce or manage differential or disproportionate effects on priority groups. Priority groups are identified because development supported by the draft HENPS may affect them in disproportionately or differently significant ways. Priority groups sit within the established set of protected characteristics, but, as in the case of this EqlA, can also go beyond the protected characteristics if a disproportionate or differential impact is expected on a group of people sharing a characteristic.

2.1.3 A four-stage approach has been developed to undertake the EqlA comprising:



Scoping

- 2.1.4 The scoping stage established the requirements for updating the 2018 EqlA so that the revised assessment is proportionate to the scope and purpose of the draft HENPS. The 2018 EqlA (prepared by WSP) provided a strong foundation for understanding the potential equality implications of Heathrow expansion. However, since 2018 there have been significant changes in policy, legislation, demographic evidence, environmental data and research. These changes required a refreshed scoping exercise to ensure that the updated EqlA reflects the current context and the Government's four tests for Heathrow expansion.
- 2.1.5 The scoping process focused on:
- Identifying the elements of the 2018 EqlA that remain valid;
 - Determining where updates are required due to new evidence or national and local policy changes;
 - Refining the study area to reflect the draft HENPS (i.e., the Heathrow Northwest Runway scheme only);
 - Reviewing recent evidence and updated socioeconomic and demographic datasets to identify priority groups most likely to experience differential or disproportionate impacts; and
 - Developing an assessment framework with themes aligning with the Government's four tests.
- 2.1.6 The outcome of the scoping stage was a refined assessment framework, focusing on the equality implications of the policies and requirements set out in the draft HENPS (June 2026).

Screening

- 2.1.7 The scoping report set out a series of EqlA screening questions aligned with the assessment framework themes. These questions were designed to identify whether the draft HENPS could result in differential or disproportionate impacts on protected characteristics groups.
- 2.1.8 These screening questions have been applied to the draft HENPS and are set out in Appendix A of this report.
- 2.1.9 The screening findings confirmed that a full EqlA for the draft HENPS is necessary, given the scale of proposed development, the potential nature of impacts, and the potential for both differential and disproportionate effects across multiple protected characteristic groups.

Full assessment

- 2.1.10 An assessment framework has been developed, providing a thematic approach that aligns with the themes outlined in the Government's tests. This will help align the EqlA with the overall ANPS review process whilst supporting the DfT with its PSED.
- 2.1.11 For each framework theme, the assessment of potential impacts is based on whether related impacts are likely to have differential effects (positive or

negative) on any priority group. This evaluation is based on the following key concepts:

- **Differential effects:** Those impacts that potentially affect a priority group differently from the rest of the general population because of specific needs or a recognised sensitivity or vulnerability associated with their protected characteristics.
- **Disproportionate representation:** Those impacts that have a greater effect on members of a priority group than on other members of the general population due to a higher proportional representation of a priority group at a particular location.
- **Direct impact:** Direct impacts are those which could potentially result in direct effects on a priority group.
- **Indirect impact:** Indirect impacts are those that would result as a consequence of direct impacts.
- **Cumulative Impacts:** Where a priority group may be affected by more than one positive or adverse impact. Cumulative impacts are identified in the following ways:
 - where a person may experience multiple sensitivities (i.e. children are sensitive to environmental changes such as air quality and noise);
 - where more than one impact is found to affect the same priority groups; and
 - where one or more impacts are experienced in the same geographical area and within this area where a priority group is over-represented.

2.1.12 This framework has been used to assess the equality effects associated with the potential direct and wider impacts of the draft HENPS.

2.1.13 The assessment framework is based on themes that align with the Government's four tests' criteria for the draft HENPS as well as other key areas identified in the updated evidence review (Chapter 4 of this report) and the objectives of the Airports Commission's Appraisal Framework.

Priority groups

2.1.14 The assessment also considers the priority groups that are most at risk of experiencing negative effects and stand to benefit the most from positive outcomes. The following evidence has been used to identify the priority equality groups to be scoped into the assessment:

- The target priority groups identified by WSP in the Equality Assessment undertaken to support designation of the ANPS (June 2018)⁹;
- Equalities baseline undertaken for this scoping exercise set out in Appendix A of this report;
- Findings from the evidence review set out in Chapter 4 of this report;

⁹ WSP (2018). Airports National Policy Statement: Equality Assessment. Available at: [Airports National Policy Statement: equality assessment](#)

- Summary of consultation responses undertaken on the Draft ANPS (June 2018)¹⁰; and
- Airports Commission evidence and Heathrow-specific studies, including community impact assessments, people assessments and socio-economic analysis.

2.1.15 Table identifies for each of the protected characteristic groups, the priority groups that are expected to be impacted by the Heathrow Expansion NPS. The table includes a definition of each group and a justification for its inclusion.

¹⁰ OPM Group (2018). Consultation on revised draft Airports National Policy Statement. Available at: [Consultation on revised draft Airports National Policy Statement](#)

Table 2-1: Overview of priority groups scoped into the assessment

Protected Characteristic	Priority group	Definition	Justification
Age	Children	Children are commonly defined as those aged 15 and under by the Office for National Statistics (ONS). ¹¹	Children are more vulnerable to the adverse health effects of air and noise pollution at home and in educational settings. The Direct Study Area (DSA) also has a higher proportion of children than the surrounding regions and the nation as a whole. There are also several playgrounds, schools and parks identified in the study area. The loss or relocation of nursery and primary schools could also lead to negative impacts on children.
	Young people (18-24 years)	Young people are defined as those aged 16-24 in ONS labour market statistics. ¹²	The additional jobs created by the Heathrow expansion are expected to be low-skilled, and so may be accessible to young people seeking first-time employment. Young people may also be subject to the same vulnerabilities as children, including air quality and noise impacts.
	Working-age people	The ONS defines the working-age population as those aged 16 to 64 years old. ¹³	The DSA has a higher proportion of working-age residents than the surrounding regions and nation, who may benefit from the new jobs expected as a result of the Heathrow expansion.
	Older people	Older people are typically defined as those aged 65 and over, a term commonly used in the UK as the marker for the start of older age. ¹⁴	Older people are more sensitive to noise due to health conditions and increased time spent at home. They are also more susceptible to respiratory and cardiovascular impacts of air pollution. Loss or relocation of housing and community facilities may increase older adults' risk of social isolation.

¹¹ Office for National Statistics (2020). Age groups. Available at: [Age groups - Office for National Statistics](#) [accessed 16/01/2026]

¹² Office for National Statistics (2024). Young people not in education, employment or training (NEET), UK: February 2024. Available at: [Young people not in education, employment or training \(NEET\), UK](#) [accessed 16/01/2026]

¹³ Office for National Statistics (2025). Working Age Population. Available at: [Working age population - GOV.UK Ethnicity facts and figures](#) [accessed 16/01/2026]

¹⁴ Office for National Statistics (2019). Living longer is age 70 the new age 65? Available at: [Living longer: is age 70 the new age 65? - Office for National Statistics](#) [accessed 16/01/2026]

Protected Characteristic	Priority group	Definition	Justification
Sex	Women	Women are individuals whose protected characteristic is sex as defined by the Equality Act 2010; this includes women of all ages, backgrounds, and circumstances. ¹⁵	Women are more often the primary caregivers of young children. ¹⁶ Changes to housing and community facilities (including childcare facilities and community playgrounds) may make balancing childcare and employment more difficult for women caregivers and reduce community cohesion.
	Men	Men are individuals whose protected characteristic is sex as defined by the Equality Act 2010; this includes men of all ages, backgrounds, and circumstances. ¹⁷	Men are often more highly represented in certain employment sectors, such as construction, transport, and aviation, as well as at Heathrow Airport. Therefore, this group may be disproportionately affected by changes to employment and economic impacts.
Pregnancy and maternity	Pregnancy and maternity	This includes individuals who are pregnant and expecting a baby. Maternity refers to the period after the birth. In a non-work context, protection against maternity discrimination is for 26 weeks after giving birth and protection from unfavourable treatment because a woman is breastfeeding.	The airport expansion can impact pregnant and maternity-period residents through noise, air pollution, and sleep disruption; stress, reduced mobility, and mental wellbeing effects; and environmental disturbances and loss of local amenities. These factors increase vulnerability, which is why pregnancy and maternity are treated as protected characteristics under the Equality Act.
Religion/belief	Minority religious groups	Minority religious groups include those with non-Christian beliefs, such as Islam, Hinduism, Judaism, Sikhism, and Buddhism, as well as those with no religion, reflecting the protected characteristic of religion or belief under the Equality Act 2010. ¹⁸	The DSA has a higher proportion of residents who identify as practising a religion than the surrounding regions and nation, including a higher proportion of minority religious groups. Major construction works may impact on access to places of worship and loss of community cohesion for affected faith groups. Air-quality impacts can disproportionately affect religious communities if places of worship or community centres are located in areas of higher exposure.

¹⁵ UK Parliament (2010). Equality Act 2010. Available at: [Equality Act 2010](#)

¹⁶ Scottish Executive (2002). Women and transport guidance and checklist. Available at: [National Records of Scotland](#).

¹⁷ UK Parliament (2010). Equality Act 2010. Available at: [Equality Act 2010](#)

¹⁸ UK Parliament (2010). Equality Act 2010. Available at: [Equality Act 2010](#)

Protected Characteristic	Priority group	Definition	Justification
Race	Ethnic groups	Ethnic minority groups refer to people who identify with an ethnic background that is not part of the majority population. This includes (but is not limited to) individuals from Black, Asian, Mixed, and Other ethnic groups, as recognised in national statistical classifications (e.g., ONS ethnicity categories). ¹⁹	The DSA has a significantly higher proportion of residents who identify as belonging to an ethnic minority group than the whole of England. Ethnic minority groups are more likely to live in areas with poorer air quality and noise pollution, both nationally and in parts of West London and on flightpaths. Loss and relocation of housing may disproportionately impact minority ethnic groups' quality of life as they are more likely to experience barriers to affordable housing, poor quality housing and overcrowding.
Disability	Disabled people	As defined by the Equality Act 2010, disabled people are defined as those who have a physical or mental impairment (lasting more than a year) that has a substantial adverse effect on their ability to carry out normal day-to-day activities. ²⁰	Disabled people, particularly those with chronic health conditions, face higher risks from air pollution. The loss or relocation of community facilities and care homes developed to meet the needs of disabled people - such as the Landon Harmondsworth School for students with special needs and Heathrow Special Needs Centre - may affect community participation for this group. The relocation of residents may also impact disabled people who have requirements for specialist homes. Disabled people further have different needs in accessing or using transport due to their disability and as such should be treated as a priority group. Changes to transport services, connections and accessibility may have differential impacts on this group.

¹⁹ Office for National Statistics (2022). Ethnic group, England and Wales: Census 2021. Available at: [Ethnic group, England and Wales - Office for National Statistics](#) [accessed 16/01/2026]

²⁰ UK Parliament (2010). Equality Act 2010. Available at: [Equality Act 2010](#)

Protected Characteristic	Priority group	Definition	Justification
Other groups	Carers	Carers are individuals who are personally responsible for the care of another dependent person, typically children under 16 (or up to 19-20 if in education), older adults, disabled people or those with a long-term limiting illness, or other vulnerabilities. ²¹	Including carers as a priority equality group allows the full EqIA to capture how changes affecting a protected characteristic group (e.g. children, older people, disabled people) may disproportionately affect those who care for them. For example, the loss of nurseries, schools and community facilities may have a differential impact on primary carers of young children, who are predominantly women.
	Low-income groups	Low-income groups include individuals or households living on less than 60% of the national median income as defined by the Department for Work & Pensions ²² , or where local income data is not available, those residing in areas identified as experiencing higher levels of income deprivation according to IMD (2025) (e.g. within the 30% most deprived lower-super output areas). ²³	The additional jobs created by the Heathrow expansion are expected to be low-skilled and accessible to those without higher-level qualifications, benefitting those from areas of relatively high unemployment and deprivation. These jobs will be a skill match for the DSA population, which has lower levels of qualification than the regional and national populations. Low-income households face higher energy costs and are less able to adapt to climate impacts.
Gender reassignment, sexual orientation and marriage and civil partnership	Not identified as priority groups at this stage	These groups have not been identified as a priority at this stage	There is no evidence that these groups are likely to experience any significant disproportionate or differential effects as a result of the draft HENPS and expansion of Heathrow Airport. For example, these priority groups do not appear to have any differential vulnerability regarding the EqIA themes, nor are they identified as users of community facilities to be lost/relocated as part of the Heathrow expansion. However, if further evidence or consultation feedback identifies use of these facilities by these groups, their inclusion should be considered within the assessment at a later stage.

²¹ Northern Ireland Office (2021). Section 75: Equality Screening Form. Available at: [NIO-Equality-Screening-Form - Hybrid working FINAL - FOR PUBLICATION.pdf](#) [accessed 16/02/2026]

²² Department for Work & Pensions (2016). How low income is measured in households below average income. Available at: [How low income is measured in households below average income - GOV.UK](#) [accessed 16/01/2026]

²³ Ministry of Housing, Communities & Local Government (2025). English indices of deprivation 2025: statistical release. Available at: [English indices of deprivation 2025: statistical release - GOV.UK](#) [accessed 16/01/2026]

Conclusions

- 2.1.16 The conclusions for the EqlA have been drawn from the assessment findings, considering differential, disproportionate and cumulative impacts across priority groups. It also makes an evidence-based judgement on how DfT has paid due regard to the three limbs of the PSED in preparing the NPS.

3. Legislation and policy review

Legislation

Equality Act 2010 and Public Sector Equality Duty (PSED)

- 3.1.1 The Equality Act 2010²⁴ is a major piece of UK legislation which provides the framework to protect the rights of individuals with the following nine protected characteristics²⁵ against unlawful discrimination and to advance equal opportunities for all:
- **Age:** This refers to persons defined by either a particular age or a range of ages;
 - **Disability:** A disabled person is someone who has a physical or mental impairment (lasting more than a year) that has a substantial adverse effect on their ability to carry out normal day-to-day activities;
 - **Gender Reassignment:** This refers to a person who is proposing to undergo, is undergoing, or has undergone a process for the purpose of reassigning their gender identity;
 - **Marriage and Civil Partnership:** Marriage can be between a man and a woman or between two people of the same sex. Civil partners must not be treated less favourably than married couples;
 - **Pregnancy and Maternity:** Pregnancy is the condition of being pregnant and expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
 - **Race:** Under the Equality Act 2010 race includes colour, nationality (including citizenship) and ethnic or national origins;
 - **Religion or Belief:** Religion means any religion and a reference to religion includes a reference to a lack of religion. Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief;
 - **Sex:** This refers to a man or to a woman, or to a group of people of the same sex; and
 - **Sexual Orientation:** this means a person's sexual orientation towards persons of the same sex, persons of the opposite sex, or persons of either sex.
- 3.1.2 Section 149 of the Equality Act sets out the PSED to which DfT, as a public body, is subject to when carrying out all its functions. Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;

²⁴ UK Parliament (2010). Equality Act 2010. Available at: [Equality Act 2010](#)

²⁵ For more details on the protected characteristics, see Part 2, Chapter 1 of the Equality Act 2010 available here: [Equality Act 2010](#)

- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - Foster good relations between people who share a protected characteristic and those who do not.
- 3.1.3 These are sometimes referred to as the three aims or limbs of the PSED. The Act at Section 149 (3) explains that having due regard for advancing equality involves:
- Removing or minimising disadvantages suffered by people due to their protected characteristics;
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
 - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
- 3.1.4 The Act describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.
- 3.1.5 Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic, but that the other limbs (advancing equality and fostering good relations) do not apply.

Planning Act (2008)

- 3.1.6 The Planning Act 2008²⁶ established a system for approving NSIPs such as some airport-related developments. Under Section 5, the Act provides the ability for the Secretary of State to designate National Policy Statements. This requires formal consultation, sustainability appraisal and parliamentary scrutiny.
- 3.1.7 An NPS sets out the need for infrastructure (such as additional airport capacity) and assessment principles and requirements for Development Consent applications. Following designation, a relevant NPS must be taken into account in the design of a development for which development consent is sought.
- 3.1.8 Under Section 104 of the Act, amongst other things, the Secretary of State must have regard to the relevant NPS and local impact reporting when making a decision on a Development Consent application.

National policy

- 3.1.9 The following sections provide an overview of the relevant national policies that have shaped this EqIA.

²⁶ UK Parliament (2008). Planning Act 2008. Available at: [Planning Act 2008](#)

Flightpath to the future: a strategic framework for the aviation sector (2022)

- 3.1.10 'Flightpath to the Future'²⁷ is the UK Government's strategic framework for the aviation sector. It sets out a long-term vision for how aviation will recover from COVID-19, grow sustainably and support economic and social goals. The strategy aims to balance economic growth, environmental responsibility, and social inclusion so that aviation contributes to the UK's prosperity while meeting climate and equality commitments.
- 3.1.11 The policy focuses on the following key themes, delivered through a series of objectives: building a resilient, innovative aviation sector; delivering net zero aviation; enhancing global connectivity and regional benefits; and developing skills and careers for the future.
- 3.1.12 The following objectives within the Framework are particularly relevant to EqIA considerations, as they influence factors such as employment, community connectivity, accessibility and wellbeing:
- **Objective 5 'Capture the potential of new technology and its uses'** - Airspace modernisation initiatives aim to reduce journey times, as well as noise and air pollution to deliver health and wellbeing benefits to communities near airports;
 - **Objective 6 'Unlock local benefits and level up'** - identifies the role of aviation in boosting regional economies and supporting local employment through improved connectivity, including Public Service Obligation routes to sustain remote communities reliant on air links;
 - **Objective 7 'Unleash the potential of the next generation of aviation professionals'** – focused on building talent pipelines, enhancing inclusion in career paths and supporting diversity through training and upskilling initiatives; and
 - **Objective 9 'Improve the consumer experience'** - focused on making aviation accessible and inclusive for all to build consumer confidence and a smooth travelling experience.

Jet Zero: Strategy for Net Zero by Aviation by 2050 (2022)

- 3.1.13 The Jet Zero Strategy (2022)²⁸ set out the UK Government's plan for achieving net zero aviation by 2050, balancing environmental goals with economic growth. The Strategy set out three core principles and five policy measures to achieve this ambition.
- 3.1.14 Through one of its core principles '**maximising opportunities**', the Strategy outlined a commitment to developing the skills needed and encouraging long-term diversity through the Reach for the Sky outreach programme. The Strategy recognised the importance of raising awareness of aviation careers and opportunities to promote diversity, inclusion, accessibility, and innovation in the sector, including in areas that support decarbonisation.

²⁷ Department for Transport (2022). Flightpath to the Future. Available at: [Flightpath to the future](#)

²⁸ Department for Transport (2022). Jet Zero Strategy: delivering net zero aviation by 2050. Available at: [Jet Zero strategy: delivering net zero aviation by 2050 - GOV.UK](#)

National Planning Policy Framework (2024)

- 3.1.15 The National Planning Policy Framework (NPPF)²⁹ was adopted in July 2018 and updated with minor revisions in February 2019, July 2021, September 2023, December 2023 and most recently, December 2024.
- 3.1.16 The NPPF (2024) consolidates the Government’s economic, environmental and social planning policies for England into a single document and describes how it expects these to be applied. The NPPF supersedes the majority of National Planning Policy Guidance and Planning Policy Statements and provides overarching guidance on the Government’s development aims.
- 3.1.17 While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system:
- The economic role contributes to building “a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”;
 - The social role supports strong, vibrant and healthy communities by “ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”; and
 - The environmental role contributes to protecting and enhancing the “natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.
- 3.1.18 Chapter 9 ‘promoting sustainable transport’ recognises the importance of maintaining a national network of general aviation airfields and their need to adapt and change overtime to serve business, leisure, training and emergency service needs.

Regional policy

- 3.1.19 The following sections provide an overview of the relevant regional policies that have shaped this EqlA.

The London Plan (2021)

- 3.1.20 The London Plan³⁰ was adopted with amendments in March 2021. The Plan includes strategic and planning policies to encourage equal life chances for all, in recognition of social inequalities existing within Greater

²⁹ Ministry of Housing, Communities & Local Government (2024). National Planning Policy Framework. Available at: [National Planning Policy Framework](#)

³⁰ Greater London Authority (2021) The London Plan. Available at: [the_london_plan_2021.pdf](#)

London. This Plan aims to influence how major infrastructure projects address social, economic and environmental equality considerations:

- **Employment and skills:** the London Plan prioritises inclusive economic growth and skills development, requiring major projects to provide local employment opportunities and support training and apprenticeships, especially for underrepresented groups;
- **Equality and inclusion:** the Plan embeds the PSED, requiring developments to address the needs of people with protected characteristics and promote inclusive design of airport facilities and transport connections;
- **Health and wellbeing:** the Plan demonstrates a strong focus on air quality, noise reduction and green infrastructure; and
- **Education and opportunity:** the London Plan encourages partnerships between developers and education providers to deliver skills for future industries.

3.1.21 In particular, Policy T8 'Aviation' acknowledges airports as drivers of spatial growth, particularly in Opportunity Areas that are well-connected by public transport and capable of accommodating significant housing and employment growth. The policy highlights the need to protect public health, particularly for communities near airports, by addressing noise, air pollution, and associated health risks, and states that any airport-related development should prioritise sustainable transport modes (rail, bus, cycling) to reduce congestion and emissions.

Local policy

3.1.22 The following sections provide an overview of the relevant local policies that have shaped this EqIA.

Hillingdon Local Plan (2012, 2020)

3.1.23 The Hillingdon Local Plan is the foundation for how planning will be controlled in Hillingdon.³¹ The Local Plan Part 1 sets out the overall level and broad locations of growth up to 2026. The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map.³²

3.1.24 Heathrow Airport is a central strategic consideration in the Hillingdon Local Plan. The Plan recognises Heathrow's role as a major economic driver while managing its substantial environmental and community impacts. Policy E3: Strategy for Heathrow Opportunity Area sets the framework for development within airport boundaries, protecting land for airport-related uses, ensuring local benefits, and requiring climate change mitigation, air-quality improvements, and cross-boundary cooperation with the Greater London Authority and Hounslow.

³¹ Hillingdon Council (2012). Local Plan: Part 1 Strategic Policies. Available at: [https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/npLocal Plan Part 1 Strategic Policies 15 feb 2013 a 1 1.pdf?m=1598370401647](https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/npLocal%20Plan%20Part%201%20Strategic%20Policies%2015%20feb%202013%20a%201.pdf?m=1598370401647)

³² Hillingdon Council (2020). Local Plan: Part 2 Development Management Policies. Available at: [https://www.hillingdon.gov.uk/media/3084/Hillingdon-Local-Plan-Part-2-Development-Management-Policies/pdf/pdLPP2 Development Management Policies - ADOPTED VERSION JAN 2020 1.pdf?m=1598370641570](https://www.hillingdon.gov.uk/media/3084/Hillingdon-Local-Plan-Part-2-Development-Management-Policies/pdf/pdLPP2%20Development%20Management%20Policies%20-%20ADOPTED%20VERSION%20JAN%2020%201.pdf?m=1598370641570)

- 3.1.25 The Plan's environmental policies provide strong protections for communities near Heathrow, including stringent controls on air quality, noise, contaminated land, flood risk, and water quality. These measures directly respond to airport-related environmental pressures.

Slough Local Plan (2016-2036)

- 3.1.26 The emerging Slough Local Plan³³ sets out the spatial strategy for long-term development across the Borough, including Colnbrook with Poyle. Central to the strategy is directing most new development to the highly accessible Centre of Slough, while safeguarding suburban areas and protecting parks and open space. The Plan's core aims include delivering sustainable housing growth, enhancing neighbourhood centres, protecting environmental assets, and maintaining the Borough's distinct identity.
- 3.1.27 The emerging Slough Local Plan places Heathrow's expansion at the heart of its spatial strategy, particularly in Colnbrook and Poyle, the Borough's only area directly bordering the airport. The Plan prioritises protecting the Strategic Gap between Slough and Greater London to prevent coalescence driven by Heathrow-related development pressure.
- 3.1.28 Slough's Emerging Spatial Strategy for accommodating growth at Heathrow outlines how development – such as airport-related employment, logistics, and supporting infrastructure – should be planned if the proposed third runway proceeds. The document sets guiding principles for land-use change, environmental mitigation, rerouting of major roads (including the M25), and safeguarding communities affected by construction and transport impacts.

Hounslow Local Plan (2020-2041)

- 3.1.29 The emerging Hounslow Local Plan (2020-2041, submitted for examination in 2025)³⁴ provides a long-term framework for shaping growth across the Borough, focusing on housing delivery, economic development, climate action, and regeneration. It sets ambitious targets, including at least 28,800 new homes and 50% affordable housing - with 70% of that being socially rented - to address community needs and contribute to London-wide housing requirements. Hounslow's Local Plan identifies Heathrow Airport as one of the most influential factors shaping the Borough's economy, housing needs, transport strategy, and environmental conditions. The Plan supports significant employment growth, 20,000 new jobs, much of which is tied to Heathrow-related sectors and the airport's west-of-borough Opportunity Area.
- 3.1.30 The Local Plan embeds sustainability and public health protections, addressing air quality, noise, and climate challenges arising from proximity to Heathrow. These include strict environmental standards, improved

³³ Slough Borough Council (2016). Slough Local Plan 2016-2036. Available at: <https://www.slough.gov.uk/downloads/file/5296/cd-12-01-emerging-spatial-strategy-accommodating-growth-at-heathrow-proposals-for-development-in-colnbrook-and-poyle-2018->

³⁴ London Borough of Hounslow (2026). Local Plan review. Available at: [Local Plan Review - Examination Introduction & News | Local Plan review | London Borough of Hounslow](#)

access to green space, and infrastructure investment to mitigate airport pressures. Consultation documents in the ongoing Local Plan Review reveal extensive coordination with Transport for London, Network Rail, and the GLA due to the airport's regional transport implications.

Windsor & Maidenhead – Borough Local Plan (2013-2033)

- 3.1.31 The Borough Local Plan (BLP) for Windsor & Maidenhead, adopted in 2022³⁵, is the primary statutory planning document guiding growth up to 2033. It establishes the Borough's development strategy, addressing housing need, employment land, infrastructure delivery, sustainability objectives, heritage protection, and environmental enhancement. The Plan supersedes earlier policy documents and now carries full weight in decision-making.
- 3.1.32 Although Windsor & Maidenhead does not border Heathrow directly, the Borough Local Plan (2013–2033) acknowledges indirect impacts of airport activity on traffic, air quality, housing demand, and strategic infrastructure. The BLP's spatial strategy emphasises safeguarding the Borough's historic environment – including Windsor Castle and the Great Park—from cumulative development pressures partly linked to Heathrow-related growth in neighbouring authorities.
- 3.1.33 The BLP's sustainability framework requires mitigation of regional environmental pressures, including air quality and climate impacts, which may be exacerbated by increased aviation activity. Policies on transport, green infrastructure, and design standards strengthen resilience against growing through-traffic and commuter flows influenced by airport employment patterns.
- 3.1.34 The Plan works alongside the Central & Eastern Berkshire Minerals & Waste Plan and several neighbourhood plans to ensure cross-boundary compliance on infrastructure and environmental protection - important as Heathrow-related growth affects waste, freight, and transport networks extending into the Borough.

Spelthorne Local Plan (2022-2037)

- 3.1.35 The Spelthorne Local Plan (2022–2037)³⁶, currently undergoing examination, sets out a comprehensive strategy for managing future development while balancing housing need, environmental constraints, and infrastructure capacity. It provides policy direction for major issues including Green Belt boundaries, flood risk management, sustainable transport, biodiversity protection, and high-quality design. The resumed 2025 hearings aim to resolve outstanding matters and ensure compliance with national planning policy.
- 3.1.36 Spelthorne lies immediately south of Heathrow and is significantly shaped by airport-related pressures. The emerging Local Plan (2022–2037) addresses Heathrow's influence through policies on flood risk, Green Belt,

³⁵ Royal Borough of Windsor and Maidenhead (2022). Borough Local Plan 2013-2033. Available at: https://consult.rbwm.gov.uk/file/5967538?_gl=1*mjmco8*_ga*OTczNDI3MDQ5LjE3NzE0MTM2ODQ.*_ga_B1S76ZFQXK*czE3NzE0MTM2ODMkbzEkZzAkDDE3NzE0MTM2ODMkajYwJGwwJGgw

³⁶ Spelthorne Borough Council (2022). Local Plan. Available here: [Local Plan | Spelthorne Borough Council](#)

housing, and transport, acknowledging the airport's impacts on congestion, noise, and demand for employment space.

- 3.1.37 Staines-upon-Thames, Spelthorne's main town, is treated as a strategic regeneration area partly because of its connectivity to Heathrow and associated economic opportunities.
- 3.1.38 The Borough has also introduced Borough-wide Article 4 Directions controlling HMOs, responding to housing market distortions influenced by transient airport-related workforces.
- 3.1.39 Overall, the Plan balances economic gains from Heathrow (jobs, supply chains, transport links) with robust measures to protect residents from environmental harm, flooding, and pressure on local services.

Guidance

- 3.1.40 The following guidance documents have been used to inform the EqIA process, including the scoping stage, outlining legal frameworks, best practice principles to embed equality considerations throughout policy development and decision-making:
- **Equality and Human Rights Commission 'How to consider equality in policy making: A 10-step guide for public bodies in England'**³⁷: supports public authorities and those delivering public functions in England to systematically integrate equality considerations throughout every stage of policy development and review through a 10-step framework; and provides practical guidance on data evidence, engagement and case studies to demonstrate application.
 - **Equality and Human Rights Commission 'Technical guidance on the Public Sector Equality Duty: England'**³⁸: provides a guide to understanding and applying the requirements of the PSED under section 149 of the Equality Act 2010 and elaborates on the general duty (three overarching aims) and specific duties introduced by the 2017 regulations.
 - **Department for Transport 'Equality and Diversity'**³⁹: outlines how DfT fulfils its obligations under the Public Sector Equality Duty (PSED) as set out in the Equality Act 2010.

³⁷ Equality and Human Rights Commission (2024). How to consider equality in policy making: A 10-step guide for public bodies in England. Available at: [How to consider equality in policy making: A 10-step guide for public bodies in England | EHRC](#)

³⁸ Equality and Human Rights Commission (2023): Technical Guidance on the Public Sector Equality Duty: England. Available at: [Technical guidance on the Public Sector Equality Duty: England | EHRC](#)

³⁹ Department for Transport (2025). Equality and Diversity. Available at: [Equality and diversity - Department for Transport - GOV.UK](#) [accessed 15/01/26]

4. Evidence review

Introduction

- 4.1.1 This chapter summarises the key evidence relevant to the EqIA for the ANPS review. Its purpose is to establish the EqIA baseline and identify relevant issues and priority groups to inform the assessment framework and full assessment of impacts. It draws upon:
- **Updated demographic and deprivation data** – from Census 2021 and the Index of Multiple Deprivation (IMD 2025), with full datasets provided in **Appendix A**.
 - **National and regional labour market evidence** – including current employment data for Heathrow and its wider supply chain.
 - **Health and wellbeing evidence** – particularly relating to the effects of noise, air quality and climate change on protected characteristic groups.
 - **Information on current transport infrastructure** – alongside research on accessibility and connectivity barriers and issues associated with congestion.
 - **Research on land-take and major infrastructure projects** – summarising how displacement, severance and construction impacts have affected protected groups in comparable schemes.
 - **Airports Commission evidence and Heathrow-specific studies** – including community impact assessments, people assessments and socio-economic analysis.
- 4.1.2 This evidence provides the basis for identifying relevant equality themes, issues, priority groups to inform the assessment and scope of the full EqIA. Detailed baseline tables are presented in **Appendix A**, with supporting research and literature summarised in the relevant sections.
- 4.1.3 The evidence is structured using the four Government tests as a focus, with further equality themes to be considered and cross-cutting issues identified at the end of the chapter. However, the assessment is not limited to the four tests and only applies the four tests to help structure the evidence.
- 4.1.4 The following geographical areas have been used in this evidence review. These were informed by the most recent red line boundary of the Heathrow expansion (see figure 4-1), the local study area identified in the Equality Assessment undertaken by WSP to support the designation of ANPS (June 2018), the outcomes of the Community Impact Assessment undertaken by Airports Commission (January 2014), and the outcomes of the People Assessment presented in the Airports Commission in the Final Report (July 2015):
- **Direct study area:** The wards of Heathrow Villages and Colnbrook with Poyle, from which there is expected to be residential land take to support the project; i.e., the project's Compulsory Purchase Zone (CPZ) includes residential properties in Heathrow Villages and Colnbrook with Poyle.

Together, these wards represent the Direct Study Area (DSA). The 2022 ward layouts were used.

- Some baseline evidence (e.g., Census data) is not available at the ward level. In this case, the local authority districts of Hillingdon and Slough were considered representative of the DSA, as these are the local authority districts in which Heathrow Villages and Colnbrook with Poyle are located, respectively.
- **Wider study area:** The local authority districts of Hillingdon, Hounslow, Slough, Windsor and Maidenhead, and Spelthorne, which represent the extent beyond the CPZ where Development Consent Order (DCO) powers may need to be exercised to support the project. Together, these districts represent the Wider Study Area (WSA). The 2023 local authority districts were used.
- **Regional and national comparator:** London, Southeast England, and England have been used for regional and national comparison.

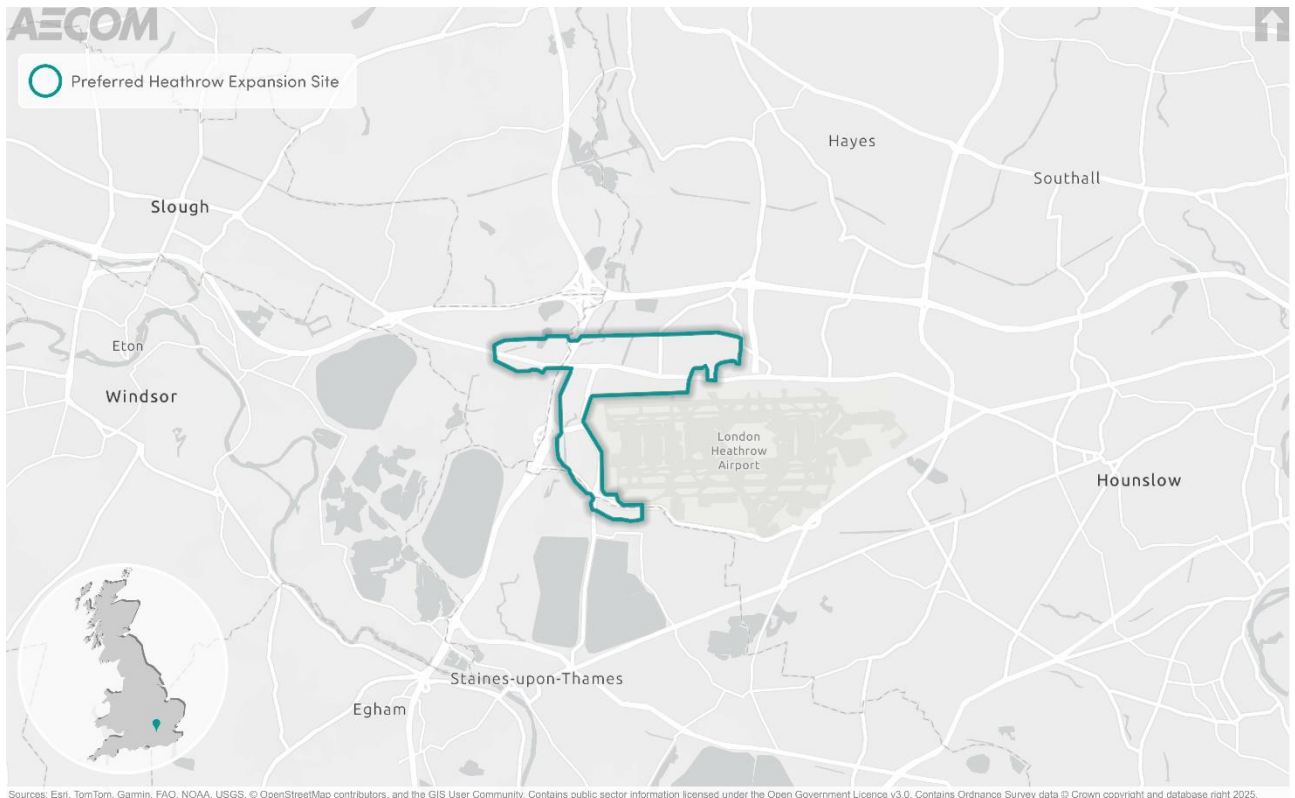


Figure 4-1. Geographical Area Boundaries

Evidence relating to the four tests

Test 1: Contributing to economic Growth Across the Country

4.1.5 Economic growth is a central objective of the draft HENPS. Evidence indicates that the distribution of economic benefits from airport expansion is shaped by:

- regional labour market disparities
- access to employment and training
- socio-economic disadvantage

- workforce diversity and inclusion
- transport connectivity

4.1.6 Nationally, economic opportunities are unevenly distributed, with persistent gaps in employment, income and skills between regions.⁴⁰ These disparities intersect with protected characteristics, particularly ethnicity, disability, age and sex.⁴¹

Employment and Skills

4.1.7 Employment rates vary significantly by protected characteristic, with lower participation among disabled people⁴², some ethnic minority groups⁴³, and women with caring responsibilities.⁴⁴

4.1.8 Young people and low-income households are more likely to be unemployed or in insecure or low-paid work.⁴⁵

4.1.9 Aviation and associated sectors (logistics, hospitality, retail) employ a diverse workforce.⁴⁶

4.1.10 Evidence for Heathrow Airport shows that the workforce is characterised as supporting generally younger workers, an ethnically diverse workforce, male employment indicating a gender imbalance, and part-time employment.⁴⁷

Regional Inequalities

4.1.11 As evidenced in **Appendix A.2**, residents of the DSA more often have a lower level of qualification and serve in lower-skilled jobs than residents of the surrounding regions and the nation.

4.1.12 Connectivity improvements can support regional economic inclusion, but benefits may not be evenly distributed.⁴⁸

Income and poverty

4.1.13 Low-income households are disproportionately represented among ethnic minority groups⁴⁹, lone parents (predominantly women)⁵⁰, and disabled people.⁵¹

4.1.14 Cost-of-living pressures have increased vulnerability since 2020.⁵²

⁴⁰ Stansbury, A., Turner, D., & Balls, E. (2023). Tackling the UK's regional economic inequality: binding constraints and avenues for policy intervention. *Contemporary Social Science*, 18(3–4), 318–356. Available at: <https://doi.org/10.1080/21582041.2023.2250745>

⁴¹ Yang Yu, Where are inequalities produced? Comparing the variations of graduate employment between the UK's districts and universities, *Socio-Economic Review*, Volume 23, Issue 1, January 2025, Pages 283–307. Available at: <https://doi.org/10.1093/ser/mwae052>

⁴² UK Government. The employment of disabled people 2024. Available at: [The employment of disabled people 2024 - GOV.UK](#)

⁴³ UK Government. Employment. Available at: [Employment - GOV.UK Ethnicity facts and figures](#)

⁴⁴ ONS. Diversity in the labour market, England and Wales: Census 2021. Available at: [Diversity in the labour market, England and Wales - Office for National Statistics](#)

⁴⁵ The Health Foundation. Inequalities in insecure work. Available at: [Inequalities in insecure work | The Health Foundation](#)

⁴⁶ British Aviation Group. [Diversity, Equity & Inclusion - British Aviation Group](#)

⁴⁷ Oxford Economics (2024). The Economic and Social Impact of Heathrow Airport. Available at: [The economic and social impact of Heathrow Airport](#)

⁴⁸ Local Government Association (2024). How local transport infrastructure influences economic inclusion. Available at: [How local transport infrastructure influences economic inclusion | Local Government Association](#)

⁴⁹ UK Government. Ethnicity Facts and Figures. Available at: [People in low income households - GOV.UK Ethnicity facts and figures](#)

⁵⁰ Joseph Rowntree Foundation (2025). UK Poverty 2025. Available at: [UK Poverty 2025: The essential guide to understanding poverty in the UK | Joseph Rowntree Foundation](#)

⁵¹ The Health Foundation. Inequalities in Poverty. Available at: [Inequalities in poverty | The Health Foundation](#)

⁵² ONS. Cost of Living Latest Insights (2024). Available at: [Cost of living latest insights - Office for National Statistics](#)

- 4.1.15 **Appendix A.1** shows that the DSA has the highest proportion of residents who identify as ethnic minorities (57%), significantly higher than that within Southeast England (14%) and the whole of England (19%). The WSA (47%) and London (46%) also have a relatively large ethnic minority population.

Summary of equality issues

- 4.1.16 Economic benefits associated with the draft HENPS may be experienced unevenly across protected groups. Groups with lower labour market participation or limited access to training may be less able to benefit from new opportunities. Conversely, groups facing socio-economic disadvantage may benefit from targeted skills and employment initiatives.

Test 2: Meeting Air Quality Obligations

- 4.1.17 Air quality is a key determinant of health and wellbeing. There is a strong correlation between poor air quality, deprivation and ethnic minority populations.⁵³ As referenced above, the DSA has a relatively large ethnic minority population.
- 4.1.18 There is evidence for increased respiratory vulnerability among children, older people and disabled people.⁵⁴ Evidence in **Table A-2** shows that the DSA has the highest proportion of children (22% aged under 16) compared to the WSA and comparators.
- 4.1.19 Pregnant people and those with cardiovascular conditions face a heightened risk from poor air quality.⁵⁵ Evidence as listed in **Table A-1** shows that the Hillingdon and Slough local authority districts have higher birth rates than the wider study area, surrounding region, and nation.
- 4.1.20 Communities around Heathrow experience varying levels of air pollution. Whilst London as a whole no longer exceeds UK legal limits for nitrogen dioxide (NO₂) on a citywide annual basis⁵⁶, there are some local pollution hotspots in several Boroughs that exceed World Health Organisation guidelines. Hillingdon for example is amongst London's ten worst-emitting Boroughs for both fine particulate matter (PM_{2.5}) and nitrogen oxides (NO_x)⁵⁷.

Health Inequalities

- 4.1.21 Children and older people are more susceptible to respiratory and cardiovascular impacts. There are a number of playgrounds, schools and parks identified in the study as evidenced in **Table A-2**.
- 4.1.22 Disabled people, particularly those with chronic health conditions, face higher risks. **Table A-2** lists a school for students with special needs in the

⁵³ Nathan R. Gray, Alastair C. Lewis, Sarah J. Moller (2024). Evaluating disparities in air pollution as a function of ethnicity, deprivation and sectoral emissions in England, *Environment International*, Volume 194. Available at: <https://doi.org/10.1016/j.envint.2024.109146>.

⁵⁴ Institute for Fiscal Studies (2024), 'Exposure to air pollution in England, 2003-23', Available at <https://ifs.org.uk/sites/default/files/2024-12/Exposure-to-air-pollution-in-England-2003-23.pdf>

⁵⁵ Leiser, C. et al. (2019). Acute effects of air pollutants on spontaneous pregnancy loss: a case-crossover study. *Fertility and sterility*, 111(2), 341-347

⁵⁶ Defra (2025). Air Pollution in the UK 2024. Available at: [Annual Report 2024 Issue 1 Online Viewer - DEFRA UK Air - GOV.UK](#)

⁵⁷ Greater London Authority (updated in 2025). London Atmospheric Emissions Inventory LAEI 2022. Available at: [London Atmospheric Emissions Inventory LAEI 2022 - London Datastore](#)

study area and a centre for people with special needs in the study area. **Table A-2** highlights evidence for notable variation in the prevalence of behavioural risk determinants of health across the five local authority districts relative to the national prevalence.

- 4.1.23 Pregnant people are more vulnerable to air pollution exposure^{58,59}. As referenced above, Hillingdon and Slough local authority districts have higher birth rates than the wider study area, surrounding region, and nation.

Spatial Patterns

- 4.1.24 Ethnic minority groups are more likely to live in areas with poorer air quality nationally and in parts of West London or on flightpaths. The evidence as presented in **Table A-1** shows that the study area has the highest proportion of residents who identify as ethnic minorities (57%), significantly higher than that within Southeast England (14%) and the whole of England (19%). The WSA (47%) and London (46%) also have a relatively large ethnic minority population.
- 4.1.25 Deprived communities often have fewer options for accessing cleaner air (e.g., less access to green space, poorer housing quality, less opportunity to change living arrangements). As evidenced in **Table A-2**, the DSA shows the greatest deprivation with respect to housing and services, and is relatively deprived with respect to living environment.

Equality implications

- 4.1.26 Changes to air quality resulting from policy amendments may disproportionately affect groups with higher exposure or greater vulnerability. The EqlA will need to consider both localised impacts and national distributional effects.

Test 3: Consistency with Noise Commitments

Noise and health evidence

- 4.1.27 Updated WHO and Public Health England evidence highlights strong links between noise exposure and sleep disturbance, stress, cardiovascular disease and cognitive impacts.^{60,61}
- 4.1.28 There is evidence for heightened sensitivity among children, older people and disabled people.⁶² As referenced above, the DSA has a higher proportion of children than the WSA, the region, and the nation.
- 4.1.29 Shift workers and night-time workers are affected in particular.^{63,64}

⁵⁸ Leiser, C. et al. (2019). Acute effects of air pollutants on spontaneous pregnancy loss: a case-crossover study. *Fertility and sterility*, 111(2), 341-347

⁵⁹ Heathrow Airport Limited (2015). Air quality assessment confirms Heathrow can expand within environmental limits. Available at: [Air quality assessment confirms Heathrow can expand within environmental limits](#)

⁶⁰ Van Kempen, E. et al (2018) WHO Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and Cardiovascular and Metabolic Effects. Available at: [WHO Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and Cardiovascular and Metabolic Effects: A Summary | MDPI](#)

⁶¹ Razai, M. et al (2025) The Impact of Noise Pollution on Health, *BMJ*. Available at: [The impact of noise pollution on health | The BMJ](#)

⁶² Halonen, J. et al (2015). Road Traffic noise is associated with increased cardiovascular morbidity and mortality in London. *European Heart Journal*. 36(39), 2653-2661

⁶³ TUC (2024) The Health and Safety Effects of Night Work. Available at: [nightworkresearchreportssummary.pdf](#)

⁶⁴ Badea, D. (2025) Circadian Disruption from Urban Night-Time Noise and Endocrine Health Risks in Shift Workers. Available at: [Circadian Disruption from Urban Night-Time Noise and Endocrine Health Risks in Shift Workers - PMC](#)

Children and education

4.1.30 Noise exposure can affect concentration, learning and cognitive development.⁶⁵

4.1.31 Schools in noise-affected areas may require additional mitigation. There are a number of schools in the area which are listed in **Table A-3**

Older people

4.1.32 Older people are more likely to face increased sensitivity to noise due to health conditions and time spent at home. Care homes and hospitals in the area are listed in **Table A-3**.

Disabled People

4.1.33 People with sensory or cognitive impairments, mental health conditions or chronic illnesses may experience greater impacts. A number of relevant services and centres in the area are listed in **Table A-3**.

Shift Workers

4.1.34 Heathrow and associated sectors employ large numbers of shift workers, who are disproportionately affected by day-time noise.

Implications for Equality

4.1.35 Noise impacts are likely to be unevenly distributed across protected groups and priority groups. The EqlA will need to consider how policy changes may alter exposure patterns.

Test 4: Aligning with Legal Obligations on Climate Change, Including Net Zero

Energy and Fuel Poverty

4.1.36 Low-income households face higher energy costs and are less able to adapt to climate impacts.⁶⁶

Workforce Transition

4.1.37 Net zero policies may create new skills and employment opportunities, but access may be uneven.⁶⁷

Climate Change equality issues

4.1.38 Climate change impacts are not evenly distributed. Evidence shows that older people, disabled people and low-income households are more vulnerable to heat, cold and extreme weather.⁶⁸ As this is often related to quality of housing, it is important to consider that the DSA faces relatively higher housing deprivation as set out in **Table A-2**.

⁶⁵ Gheller, F. et al (2024) The Effects of Noise on Children's Cognitive Performance: A Systematic Review. Available at: [The Effects of Noise on Children's Cognitive Performance: A Systematic Review - Flavia Gheller, Gaia Spicciarelli, Pietro Scimemi, Barbara Arfé, 2023](#)

⁶⁶ Joseph Rowntree Foundation (2026). Ethnicity, poverty, and in-work inequalities in the UK. Available at: [Ethnicity, poverty, and in-work inequalities in the UK | Joseph Rowntree Foundation](#)

⁶⁷ Reay D (2024) The uneven foundations of a just transition for workers: a UK perspective. Front. Clim. 6:1498156. Available at: [Frontiers | The uneven foundations of a just transition for workers: a UK perspective](#)

⁶⁸ UK Health Security Agency (2024). Adverse Weather and Health Plan. Available at: [Adverse Weather and Health Plan: Supporting evidence](#)

Transport

- 4.1.39 Access to low-carbon transport varies by income, disability and geography.⁶⁹
- 4.1.40 Evidence shows that Heathrow Airport is highly accessible via public transport, with London Underground (the Piccadilly and Elizabeth Lines), bus (13 different routes), and express rail services from central London (Paddington station). The main Airport complex (consisting of Terminals 1, 2, 3 and 5) has a connectivity score of 6a, as assessed via Transport for London's Public Transport Access Tool (PTAL). The PTAL assesses connectivity by considering walk time to the public transport network with service wait times, and the highest possible score (i.e., highest level of connectivity) is 6b.⁷⁰ Considering the area surrounding the Airport, only the parts of the study area with London Underground, multiple bus routes and/or National Rail service are also considered well-connected by the PTAL. These include Uxbridge (the Piccadilly and Metropolitan Lines and 20 bus routes), Hayes & Harlington (the Elizabeth Line, 10 bus routes, and Great Western Rail service), and Hatton Cross (the Piccadilly Line and 10 bus routes) in the Borough of Hillingdon; and Hounslow (the Piccadilly Line and 18 bus routes).
- 4.1.41 Most of the aforementioned transport services operate via central London, and transport services connecting other parts of the study area are more limited; there are large parts of the London study area with a PTAL connectivity score of 0. The Elizabeth Line continues west of the airport, with stations in Hayes & Harlington, West Drayton, Iver, Burnham, Taplow, and Maidenhead. Great Western Railway also operates along this track, with a branch extending south to Windsor, and north to Furze Platt and Cookham. Finally, South Western Railway serves the area south of Heathrow, also with a terminal station in Windsor.⁷¹
- 4.1.42 The Elizabeth Line, Great Western Rail, and South Western Railway all primarily operate east-west. There is no direct north-south rail connection between parts of the study area.

⁶⁹ Government Office for Science (2019). Inequalities in Mobility and Access in the UK Transport System. Available at: [Future of mobility: inequalities in mobility and access in the UK Transport System](#)

⁷⁰ Transport for London (2022). WebCAT Planning Tool. Available at: [WebCAT 3.0 - Web-based Connectivity Assessment Toolkit](#)

⁷¹ National Rail (n.d.). All Stations Interactive Route Map. Available at: [National Rail All Stations Interactive Route Map](#)

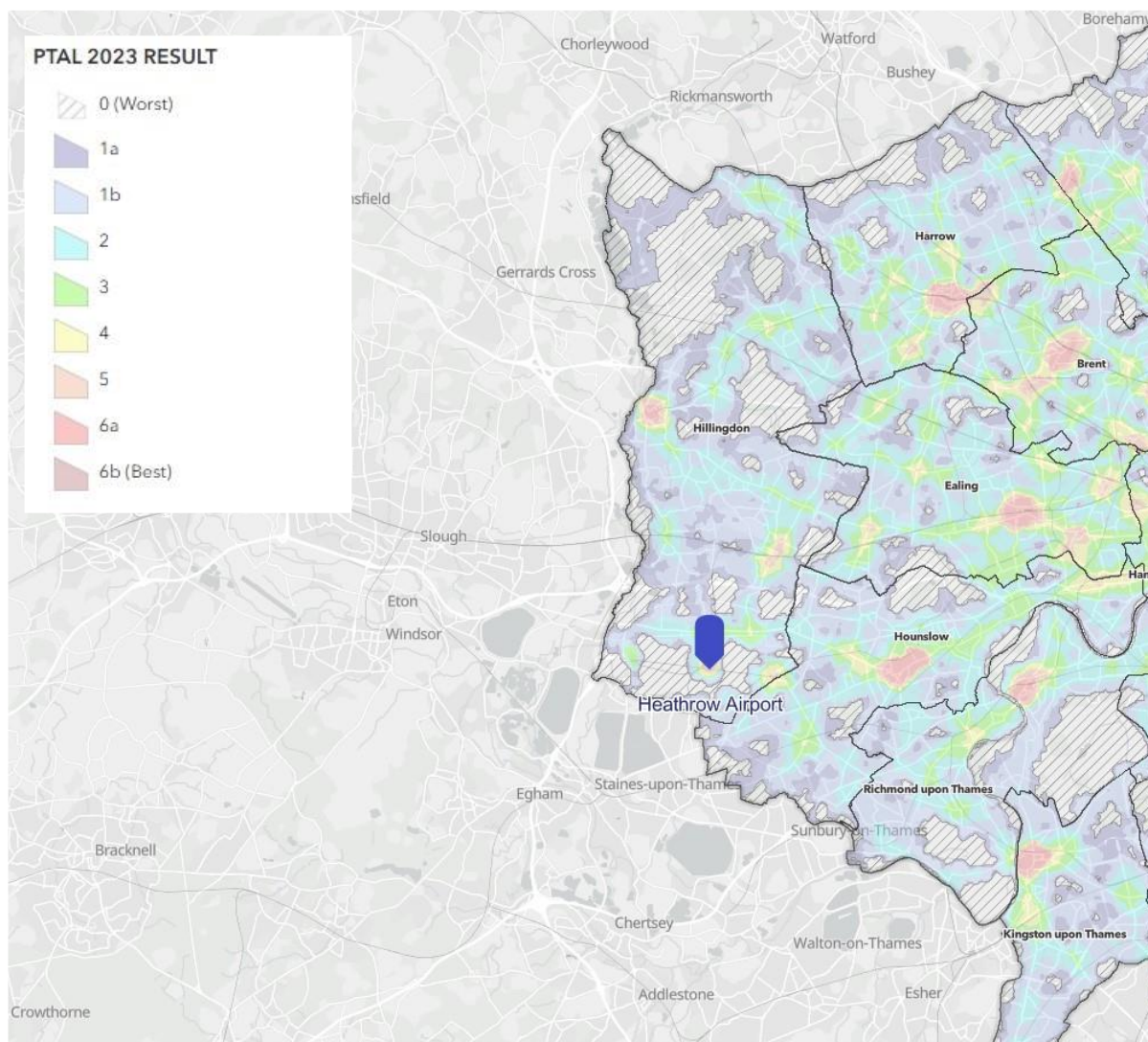


Figure 4-2. PTAL Map of the Study Area

Land-take

4.1.43 There is a need to identify potential equality effects in relation to land acquisition required for the new third runway. The potential land take as of 2019 for the Heathrow Airport Expansion is defined by the Compulsory Purchase Zone (CPZ), which includes all residential properties anticipated to be required by the Project.⁷²

Implications for Equality

4.1.44 Climate-related policy changes may create both risks and opportunities for protected groups. The EqlA will assess how the draft HENPS aligns with net zero while ensuring equitable outcomes.

⁷² Heathrow Airport Limited (2019). Heathrow Expansion Consultation. Available at: [Heathrow-Expansion-Consultation-June-2019.pdf](#)

Cross-cutting equality themes

4.1.45 Across the four tests' criteria, several cross-cutting themes emerge:

- **Health inequalities:** some protected characteristic groups experience higher vulnerability to the adverse health effects of air and noise pollution.
- **Accessibility and mobility:** transport access remains a barrier for disabled and older people.
- **Socio-economic disadvantage:** deprivation intersects with protected characteristics.
- **Digital inclusion:** affects access to information, services and travel.
- **Intersectionality:** overlapping characteristics (e.g., ethnicity, deprivation and disability) exacerbate vulnerabilities.
- **Cumulative impacts:** noise, air quality and socio-economic issues often combine to increase negative effects.

Priority Groups

4.1.46 Based on the evidence, the following groups are likely to experience differential or disproportionate impacts (see **Table 2-1** for justifications):

- Women and men;
- children and young people;
- older people;
- disabled people including people with limited mobility and those vulnerable to air and noise impacts;
- pregnant people;
- ethnic minority groups;
- low-income households;
- carers (predominantly women).

4.1.47 While the full impact assessment will include an assessment of all protected characteristic groups, the above groups will be the priority focus.

Summary of Implications for the EqlA

4.1.48 The evidence indicates that:

- The positive and negative impacts associated with the ANPS review are likely to be unevenly distributed across groups.
- Certain protected groups face higher exposure or vulnerability to negative impacts, resulting in differential effects.
- Socio-economic disadvantage may exacerbate negative impacts across groups further.
- Wider national and regional differential effects should be considered in addition to local impacts.

- Updated evidence and modelling work will be essential for a robust assessment.

Consultation and engagement

- 4.1.49 The Government's announcement that the preferred option for delivering airport expansion in the Southeast of England was a new Northwest runway at Heathrow Airport in February 2017 was followed by a 16-week consultation on the draft ANPS. This consultation period received over 72,000 responses.
- 4.1.50 A further eight-week consultation period on the revised draft ANPS was launched by the Secretary of State for Transport in October-December 2017. The purpose of this consultation period was to present the revised Appraisal of Sustainability, including an updated evidence base, demand forecasts, and the Air Quality Plan.
- 4.1.51 DfT used various methods to raise awareness of the consultation:
- Contacted over 65,000 people who responded to the earlier draft ANPS consultation (50,000 via letter and 15,000 via email);
 - Working with 30 local authorities to raise awareness of the consultation among local residents. This included the provision of advertising materials, a press release and digital tools;
 - Social media platforms, including Facebook pop-up adverts and DfT Twitter channel; and
 - Press adverts in newspapers.
- 4.1.52 This consultation received 11,028 responses, of which 10,851 came from members of the public, and 177 came from recognisable organisations or elected representatives.⁷³ Consultation responses relevant to the consideration of equality impacts include the following:
- Consultation respondents expressed concern about the demolition of homes, a loss of sense of community and the displacement of long-established communities.
 - Respondents frequently raised concerns that increased aircraft noise would negatively affect health and wellbeing, especially for people living and attending schools within flight paths.
 - Many respondents commented that air pollution could worsen, with associated respiratory and cardiovascular impacts.
 - Respondents also linked carbon emissions to long-term environmental and health impacts, which can disproportionately affect vulnerable and future populations.
 - Respondents were concerned about the potential for additional airport-related road traffic and congestion, particularly in areas where local traffic is already a problem.

⁷³ OPM (2018). Consultation on revised draft Airports National Policy Statement: Summary report of consultation responses. Available at: [Consultation on revised draft Airports National Policy Statement](#)

- There were also concerns regarding possible delays or congestion for various public transport networks linked to the airport, including rail and the underground.
- Some respondents felt that the language used in consultation materials was technical and challenging to understand, which may have discouraged those most likely to be affected by the proposal from engaging.

5. Assessment of impacts

Overview

- 5.1.1 This chapter sets out an assessment of the potential equality impacts associated with the draft HENPS. It applies the framework approach set out in Chapter 2 to assess how the Expansion of Heathrow, in combination with the policies and requirements of the draft HENPS, may result in differential, disproportionate, or cumulative impacts on groups with protected characteristics and other identified priority groups.
- 5.1.2 The full impact assessment is required based on the findings of the screening that was conducted (see **Appendix B**). The screening questions were designed to identify whether the draft HENPS could result in differential or disproportionate impacts on protected characteristics groups. The screening findings demonstrates that the draft HENPS has the potential to generate both positive and negative equality effects and therefore requires a full EqIA. The screening considered all chapters of the draft HENPS. All chapters screened in are assessed in full and are thus not limited to the Government's four tests.
- 5.1.3 The assessment is structured around but not limited to the themes aligned with the Government's four tests and the wider policy areas set out in the draft HENPS, including:

Table 5-1 Assessment framework

EqlA theme	Aligned appraisal objective	Relevant Government Tests
Economic Growth	<ul style="list-style-type: none"> To promote employment and economic growth in the local area and surrounding region. To produce positive outcomes for local communities and the local economy. 	<ul style="list-style-type: none"> Contributes to economic growth across the country
Health and Wellbeing	<ul style="list-style-type: none"> To minimise and, where possible, reduce air, carbon and noise impacts. To reduce or avoid disproportionate impacts on any social group. 	<ul style="list-style-type: none"> Meets air quality obligations Consistent with noise commitments Aligns with legal obligations on climate change, including net zero
Transport and Connectivity	<ul style="list-style-type: none"> To enable access to the airport from a wide catchment area. To maximise the number of passengers and workforce accessing the airport via sustainable modes of transport. To accommodate other users such as commuters, intercity travellers and freight. 	<ul style="list-style-type: none"> Aligns with legal obligations on climate change, including net zero
Residents and communities	<ul style="list-style-type: none"> To maintain and, where possible, improve the quality of life for local residents and the wider population. To manage and reduce the effects of housing loss on local communities To reduce or avoid disproportionate impacts on any social group. To actively engage local groups in scheme progression, design and management. 	<ul style="list-style-type: none"> Not applicable

5.1.4 For each theme, the assessment identifies the relevant impacts of the Heathrow Expansion, the priority groups most likely to be affected, and the nature and extent of potential equality effects. It also maps specific draft HENPS policies to impacts and helps demonstrate the extent to which draft HENPS policy requirements minimise negative impacts.

5.1.5 The assessment draws on the updated evidence base presented in Chapter 4, including demographic and socioeconomic data, as well as research on vulnerability and sensitivity to effects arising from Heathrow expansion. It also considers cumulative and intersectional impacts where multiple effects may interact or where priority groups are over-represented in affected areas.

- 5.1.6 Therefore, this chapter determines the overall equality implications of the draft HENPS and supports the DfT in demonstrating due regard to the three limbs of the PSED.

Thematic assessment

Economic Growth

- 5.1.7 The Economic Growth theme considers the potential equality impacts associated with the employment, skills, supply chain and wider local, regional and national economic changes that could arise from the delivery of the Heathrow Northwest Runway and associated terminal infrastructure, as described in the draft HENPS.

Positive impacts

- 5.1.8 Potential benefits relating to the delivery of Heathrow Expansion include the creation of new jobs, skills development and training opportunities during construction⁷⁴ and operation. This could have positive effects on those who currently face barriers to employment, including low-income households, ethnic minority groups, disabled people, young people and carers.
- 5.1.9 The expansion may also create opportunities for local businesses and promote national, regional and local economic growth.
- 5.1.10 Draft HENPS policies on Economic Growth and Skills will impact the extent to which potential positive equality effects may be enhanced. This includes requirements for applicants to:
- Develop an Economic Growth Strategy to include opportunities for the supply chain, freight, tourism, employment and skills during the construction and operational phases of the project.
 - Put in place arrangements to maximise the employment and skills opportunities for residents, including apprenticeships and early career opportunities; and
 - Assess the project's economic impacts across the country, including a breakdown of wider benefits at a national, regional and local level.;
 - For promoters to support delivery of 5,000 youth apprenticeships, traineeships and other recognised entry-level pathways.
 - Promoters should prepare and submit a Youth Employment and Skills Plan, covering both the construction and operational phases of the proposal. This is to set out the applicants plan for the delivery of youth apprenticeships, traineeships and other recognised entry-level pathways. This plan should outline opportunities for work placements, work experience and work-readiness training pathways for people in their workforce; and to engage and work with local education and training providers, Skills Bootcamp providers, further education colleges and employment support organisations to maximise local participation.
 - The Government expects that any promoter will need to demonstrate that they can make a significant contribution to local employment and

⁷⁴ Construction-related impacts are temporary, as they are limited to the duration of construction only.

outline any skills and early employment initiatives designed to support the business needs of the airport. The Government expects that, with expansion, any promoter should commit to supporting 5,000 youth apprenticeships employed as a result of Heathrow expansion by 2035, at the airport and in its supply chain and airport-related businesses.

- The draft HENPS sets out that applicants are expected to set out minimum commitments, delivery mechanisms and review points, including how targets will be updated as its workforce requirements become clearer.

5.1.11 The Government will consider how authorities can benefit from increased business rates through a business rate retention scheme and work together to share the benefits. It is also supporting the development of a Community Compensation Fund, which could distribute £750 million to local communities.

5.1.12 The above policies may help to demonstrate economic impacts and how benefits are distributed locally, regionally and nationally. They will also help to create opportunities that can be shared by groups with protected characteristics.

Negative impacts

5.1.13 The Heathrow expansion could also result in some local businesses needing to relocate as a result of land-take required for the delivery of the expansion and may be subject to compulsory purchase. Other businesses may be affected by the construction-related disruption. Indirect effects include loss of business viability, loss of income for business owners, and loss of employment. Small and minority-owned businesses may experience disproportionate impacts due to a lower ability to relocate or dependence on local cultural communities for business. Those who face barriers to employment, such as young people, disabled people, and ethnic minority groups, may be disproportionately affected by job losses.

5.1.14 Local residents may also experience cost-of-living pressures due to the loss of local accessible, affordable or culturally specific services and goods provided by affected businesses. This may disproportionately affect low-income households, households with young children, older people, disabled people, women and ethnic minority groups.

5.1.15 Draft HENPS policies on Economic Growth, Community Compensation and Skills may impact the extent to which these potential negative equality effects may be avoided, reduced or managed. This includes requirements for applicants to:

- Provide financial compensation to interests affected by a Compulsory Purchase Order (CPO);
- Set out in the Economic Growth strategy how adverse outcomes will be managed;
- Provide an appropriate community compensation package; and
- Put in place arrangements to maximise the employment and skills opportunities for local residents, including apprenticeships and early career opportunities.

Health and Wellbeing

- 5.1.16 The Health and Wellbeing theme considers the potential equality impacts associated with changes in air quality, noise, construction activities, mental well-being, and climate-related burdens that could arise from the delivery of the Heathrow Northwest Runway and associated terminal infrastructure.

Positive impacts

- 5.1.17 As set out in the Economic Growth section above, the Heathrow Expansion scheme is likely to result in the creation of jobs, skills and employment opportunities for local people. This may benefit groups who face barriers to employment participation or who are over-represented in unemployment figures, including young people, certain ethnic minority groups and disabled people. Women are also under-represented in construction-related employment. Improved access to secure, good-quality work may therefore support positive health and mental wellbeing outcomes for these groups.
- 5.1.18 Draft HENPS policies on Economic Growth and Skills will impact the extent to which potential positive equality effects may be enhanced. This includes requirements for applicants to:
- Develop an Economic Growth Strategy to include opportunities for the supply chain, freight, tourism, employment and skills during the construction and operational phases of the project;
 - Put in place arrangements to maximise the employment and skills opportunities for local residents, including apprenticeships and early career opportunities; and
 - Develop a Youth Employment and Skills Plan.

Negative impacts

- 5.1.19 The draft HENPS acknowledges that increases in emissions of pollutants during the construction or operational phases of the scheme could result in the worsening of local air quality, which is likely to lead to increases in air pollution in some areas. This can contribute to adverse impacts on human health, which may have differential or disproportionate effects on children, older people, disabled people, pregnant people and ethnic minority groups, reflecting established sensitivities to environmental change and the spatial distribution of priority groups around Heathrow.
- 5.1.20 The DfT has undertaken an analysis of baseline and forecast emissions following an analysis by the then Government in 2018 which concluded that the Heathrow Northwest Runway scheme would be capable of being delivered without impacting the UK's compliance with air quality limit values at that time. The indicative analysis suggests that, based on current evidence, the Government's conclusions for NO₂ and PM₁₀ impacts for the 2018 ANPS can be applied to the position as at 2026 (subject to the uncertainties identified in the analysis). Despite notable improvements in the emission impact of ground support equipment due to electrification, and auxiliary power unit usage due to increased operating restrictions at the airport, 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. Indicative analysis undertaken for the ANPS review suggests no new exceedance of the 2040 annual mean concentration target for PM_{2.5} as a result of Heathrow expansion but suggests that one existing

monitoring site could exceed targets even without expansion. When illustrative mode share targets are taken into account, the analysis indicates that Heathrow expansion would not materially worsen this breach.

- 5.1.21 However, there are requirements on applicants within the draft HENPS to demonstrate this is the case as part of its environmental statement, along with providing other evidence to satisfy policies associated with air quality. These policies, along with additional policies under Community Compensation, Dust and Surface Access, may shape the extent to which potential negative health and well-being effects can be avoided, reduced, or managed. Requirements include to:
- Prepare an air quality assessment as part of the Environmental Statement;
 - Undertake a health impact assessment;
 - Climate change adaptation embedded throughout DCO application development.
- 5.1.22 The draft HENPS acknowledges that exposure to noise can lead to annoyance, disturb sleep, and affect people's health. Aircraft operations are the largest source of noise emissions from an airport. However, there will additionally be ground transport impacts during operation and construction noise as well. These might be in areas less affected by aircraft noise, so still need considering, even if not the largest source overall. The Government's analysis of the proposed Northwest Runway scheme shows that although noise impacts will increase compared to a no-expansion scenario, noise impacts on the number of individuals and households can be limited to no greater than 2024 noise levels despite additional flights. This is due to new, quieter aircraft gradually replacing the current fleet. However, further noise will also be generated by ground operations and surface transport during the construction phase of a scheme.
- 5.1.23 Noise impacts may have differential effects on children, older people, and disabled people due to an increased sensitivity or vulnerability to noise change. Ethnic minority groups may be disproportionately impacted due to the spatial distribution of priority groups around Heathrow.
- 5.1.24 Draft HENPS policies on Noise and Community Compensation set out mitigation on how potential negative effects may be avoided, reduced or managed. This includes mitigations such as the night flight ban and careful airspace design.
- 5.1.25 Applicants are also required to:
- Prepare a noise assessment as part of the Environmental Statement. Including changes in noise levels for sensitive receptors and noise exposure maps (including as a result of ground traffic);
 - Develop a package of noise mitigation measures in consultation with local communities and other stakeholders. This should include:
 - Plans for a noise envelope tailored to local priorities with clear noise performance targets.
 - Plans for a runway alternation scheme that would continue to provide communities affected with predictable periods of respite following

- expansion (though the Government acknowledges that the duration of periods of respite that currently apply will be reduced).
- Implementation of a ban on scheduled night flights for a period of six and a half hours based on take-off and landing times, between the hours of 11pm and 7am.
 - Construction noise management.
 - Provide full acoustic insulation for residential property within the full single mode easterly and westerly 60dB LAeq (16hr) noise contour of an expanded airport and a contribution of up to £3,000 for acoustic insulation for residential properties within the full single mode easterly and westerly 57dB LAeq (16hr) or the full 55dB Lden noise contours of an expanded airport.
- 5.1.26 As a result of an increase in emissions caused by additional aviation traffic, draft HENPS may contribute to further global warming. This can have a disproportionate impact on children, older people, and people with a disability, pregnant women because their bodies, living conditions, or support needs make it harder to regulate heat, stay hydrated, or respond quickly to danger.
- 5.1.27 Further negative health impacts are likely to arise from stress and anxiety for local residents, especially those who are subject to the CPO. Policies associated with Community Engagement and Community Compensation and construction management plans should help to mitigate against impacts. In addition, applicants will be required to produce a project-level Health Impact Assessment. It is recommended that the health and equality impact assessments be aligned to clearly identify the distributional effects of health impacts.

Transport and Connectivity

- 5.1.28 The Transport and Connectivity theme examines the potential equality impacts associated with changes to the local transport network, journey times, severance and access to Heathrow Airport that could arise from the delivery of the Heathrow Northwest Runway and associated terminal infrastructure.

Positive impacts

- 5.1.29 Heathrow Expansion may improve access to employment, training and services through enhanced public transport provision and investment in surface access infrastructure. This includes the introduction of new trains on the Piccadilly Line, which increased capacity, and the potential for additional Elizabeth line trains, enabling more journeys to Heathrow per hour. Increased bus and coach routes will also improve access to areas that are currently underserved. These transport improvements may help to enhance positive equality effects by:
- Improving access to Heathrow for groups without access to a private car;
 - Reducing travel times for workers and passengers;
 - Supporting modal shift away from car use, which can benefit air quality and health; and
 - Enhancing safety and accessibility.

- 5.1.30 Improved connectivity can support groups who are more reliant on public transport, walking and cycling, including young people, older people, disabled people, women, carers and low-income households.
- 5.1.31 Draft HENPS policies on Surface Access and Accessibility require applicants to demonstrate how sustainable transport modes, including rail, bus, coach, and active travel, will support the scheme. The draft HENPS also requires applicants to:
- Prepare an airport surface access strategy in conjunction with its Airport Transport Forum, setting out how public transport capacity will be increased and how the scheme will avoid adverse impacts on the strategic and local road networks. If delivered effectively, this could support equality of opportunity by improving affordable, reliable and accessible transport options for priority groups.
 - Include clear details of how plans will improve access at and around the airport by designing and delivering schemes that fully consider and address the accessibility needs of all those who use the airport, including surface access infrastructure.
- 5.1.32 The draft HENPS also includes requirements for applicants to consider a full range of access needs and to include input from those with lived-experience input.
- 5.1.33 The effectiveness of these measures will depend on how they are implemented by applicants, including the extent to which they engage with diverse user groups and apply inclusive design principles in practice. It is therefore recommended that clearer guidance be provided on accessibility and inclusive design requirements.

Negative impacts

- 5.1.34 Construction and operation of the scheme may increase traffic volumes, congestion and journey times on local roads. This includes ground transport noises, and noise caused by the expected additional flight traffic. These impacts may disproportionately affect low-income households, disabled people, older people and carers, who are more reliant on local services and may have less flexibility in travel patterns.
- 5.1.35 Changes to road layouts, pedestrian routes and bus services may also create community severance, reducing access to schools, healthcare, shops and social networks. Severance effects can disproportionately impact children, older people, disabled people and women, particularly those who rely on walking, wheeling or public transport.
- 5.1.36 Increased construction traffic may raise road safety risks, particularly for children, older people and disabled people. Perceived safety concerns may reduce active travel, with knock-on effects for physical and mental wellbeing.
- 5.1.37 If public transport capacity does not keep pace with increased demand, overcrowding and reduced reliability may disproportionately affect groups who depend on public transport, including young people, low-income households and ethnic minority groups.

5.1.38 Draft HENPS policies on Surface Access and Community Engagement set out how potential negative effects may be avoided, reduced or managed. Requirements include that applicants must:

- Prepare a Surface Access Strategy that incentivises mode shift to public transport and active travel, and prioritises environmental sustainability;
- Provide evidence that the scheme will not lead to unacceptable impacts on the strategic or local road networks
- Demonstrate how public transport capacity will be increased to accommodate additional demand
- Set out measures to minimise community severance
- Prepare a Construction Traffic Management Plan to manage construction-phase impacts
- Engage with local authorities, transport operators and communities to shape mitigation measures;
- Where changes are made to roads, consider measures to maximise improvements to active travel facilities reflecting national good practice and consider measures that may incentivise the use of public transport.
- Consider and set out measures to mitigate the impacts on disabled people and others with specific accessibility requirements, to ensure not only that surface access is accessible to all passengers, including those with a range of visible and less visible impairments, but that the same is true for connectivity between modes and with the airport;
- Evidence how disabled people have been engaged and how accessibility principles have been embedded in plans from the start;
- Promoters should assess distributional impacts of their proposals on different social groups; and
- Where appropriate, to seek to deliver improvements or mitigation measures that reduce community severance and improve accessibility.

5.1.39 These requirements provide a framework for managing transport-related equality impacts, but their effectiveness will depend on the extent to which applicants prioritise accessibility, affordability and inclusive design. Further guidance in this instance may help to support positive outcomes.

Residents and Communities

5.1.40 The Residents and Communities theme considers the potential equality impacts associated with land take requiring the compulsory acquisition of residential and community interests, changes to community facilities, local services and changes to community cohesion that could arise from the delivery of the Heathrow Northwest Runway and associated terminal infrastructure.

Positive impacts

- 5.1.41 Heathrow Expansion may generate wider community benefits through increased investment in local services, improvements to community facilities and enhanced public realm, depending on how applicants implement draft HENPS requirements. Improved access to employment and training opportunities may also support community resilience and wellbeing, particularly for groups facing labour market barriers.
- 5.1.42 Draft HENPS policies on Community Compensation, Land Use, Skills and Engagement shape the extent to which positive community outcomes can be realised. These include requirements for applicants to:
- Engage with affected communities throughout scheme development;
 - Replace or re-provide community facilities where loss or displacement occurs;
 - Demonstrate how land use changes will be managed to minimise adverse effects; and
 - Provide a Community Compensation Package to support local areas affected by expansion.
- 5.1.43 If delivered effectively, these measures may help maintain access to essential services, support community cohesion and ensure that wider benefits and compensation are shared by groups with protected characteristics.
- 5.1.44 However, the draft HENPS does not explicitly require applicants to demonstrate how replacement community facilities will be designed, located or delivered in ways that meet the needs of groups most reliant on local services, including older people, disabled people, carers and ethnic minority groups. The effectiveness of mitigation will depend on how applicants engage with diverse communities and incorporate lived-experience input into design decisions.
- 5.1.45 There is also no explicit requirement for applicants to assess the distributional impacts of community change, including whether the loss of culturally specific services, informal support networks or affordable local amenities disproportionately affects particular protected characteristic groups or deprived communities. It is recommended that this be undertaken as a specific requirement of the project-level Equality Impact Assessment.

Negative impacts

- 5.1.46 The Heathrow Expansion will require the compulsory acquisition of residential properties within the new airport boundary. Loss of homes can have significant impacts on affected households, including disruption to social networks, increased financial pressure and stress associated with relocation. These impacts may be disproportionate for older people, disabled people, low-income households and ethnic minority groups, who may face greater barriers to securing suitable alternative accommodation or have more reliance on local services and networks.
- 5.1.47 Changes to community facilities, including the loss or relocation of schools, health services, places of worship, cultural centres and local amenities, may affect access to essential local services. Groups who rely more

heavily on local provision, such as older people, carers, disabled people and low-income households, may be disproportionately affected.

- 5.1.48 Construction activities may also affect community cohesion through increased air pollution, noise, dust, traffic and temporary severance/obstruction of pedestrian routes. These impacts may be felt more acutely by children, older people, disabled people and ethnic minority groups, particularly where communities are already experiencing environmental or socio-economic disadvantage.
- 5.1.49 Draft HENPS policies on Community Compensation, Land Use, Air Quality, Noise, Community Engagement and Place Making set out how potential negative community impacts may be avoided, reduced or managed. Requirements include that applicants must:
- Provide financial compensation to interests affected by compulsory acquisition;
 - Replace or re-provide community facilities where loss occurs;
 - Demonstrate how land use changes will minimise adverse effects on communities;
 - Engage with affected communities to shape mitigation measures;
 - Prepare plans to manage construction-related disruption, including dust, noise and severance; and
 - Set out how the Community Compensation Package will support local areas;
 - include engagement with local authorities on the local needs of the area, taking into account the development plan, including relevant policies in any part of the development plan at examination but has not yet been adopted.
- 5.1.50 These policies help to manage community-related impacts, but their effectiveness will depend on how they are implemented by applicants, including the extent to which they engage with diverse communities to understand local need, especially in relation to priority groups. Consultation and engagement materials should be provided in English as well as other main languages spoken in the local authorities. This is to ensure accessibility and to address language barriers.

Summary of impact assessment

- 5.1.51 **Error! Reference source not found.** below identifies the potential impacts associated with the Heathrow expansion, the likely equality effects for priority groups, and the specific draft HENPS policy requirements relating to the impact.
- 5.1.52 Appendix C sets out positive and negative impacts by protected characteristic group.

Table 5-2 EqIA Summary Table

Theme	Impacts of Heathrow Expansion	Equality effects	Supporting draft HENPS policies and requirements
Economic Growth	Job creation during construction and operation	Positive effects for groups facing barriers to employment (low-income households, ethnic minority groups, disabled people, young people, carers).	Applicant requirements to: <ul style="list-style-type: none"> • Develop an Economic Growth Strategy; • Maximise employment and skills opportunities; • Assess economic impacts nationally, regionally and locally.
	Skills and training opportunities	Potential for positive effects for young people, women, disabled people and some ethnic minority groups who are under-represented in construction and air sectors.	Applicant requirements to: <ul style="list-style-type: none"> • Include skills and training in the Economic Growth Strategy; • Provide apprenticeships and early career opportunities.
	Supply chain opportunities	Positive effects for SMEs and minority-owned businesses if common barriers to accessing opportunities are removed.	Applicant requirement to include supply chain opportunities in the Economic Growth Strategy.
	Local, regional and national economic growth	Potential for positive effects across all priority groups, but benefits may not be evenly distributed across protected groups or deprived communities.	Applicant requirements to assess economic impacts across the country and demonstrate wider benefits.
	Business displacement due to CPO	Disproportionate negative impacts on small and minority-owned businesses; knock-on effects for groups facing labour market barriers.	Requirements to: <ul style="list-style-type: none"> • Provide financial compensation; • Manage adverse outcomes in the Economic Growth Strategy; • Provide a Community Compensation Package.
	Cost-of-living pressures	Disproportionate negative impacts on low-income households, households with young children, older people, disabled people, women and ethnic minority groups.	Indirectly linked to economic assessment requirements.

Theme	Impacts of Heathrow Expansion	Equality effects	Supporting draft HENPS policies and requirements
Health and Wellbeing	Employment-related well-being benefits	Positive mental well-being effects for young people, ethnic minority groups, disabled people and women if barriers to employment are addressed.	Requirements to: <ul style="list-style-type: none"> • Develop an Economic Growth Strategy; • Develop a Youth Employment and Skills Plan; • Maximise employment and skills opportunities.
	Changes in air quality	Differential and disproportionate negative effects on children, older people, disabled people, pregnant people and ethnic minority groups.	Requirements to: <ul style="list-style-type: none"> • Prepare an air quality assessment; • Undertake a Health Impact Assessment; demonstrate compliance with legal obligations.
	Changes in noise levels	Differential negative effects on children, older people and disabled people; disproportionate effects on ethnic minority groups due to spatial distribution and sensitivity.	Requirements to: <ul style="list-style-type: none"> • Prepare a noise assessment; • Develop a noise envelope; • Provide respite; • Ban scheduled night flights; • Provide acoustic insulation and financial compensation; • Manage construction noise.
	Mental wellbeing impacts during construction	Stress and disruption may disproportionately negatively affect carers, disabled people and older people.	Requirements relating to <ul style="list-style-type: none"> • Assess dust, odour, light, smoke, steam and amenity; • Construction management; and • Community Compensation Package.
	Climate-related burdens	Long-term health impacts may disproportionately negatively affect vulnerable groups. This includes a rise in global temperatures.	Requirement that carbon, air quality and noise obligations cannot be overridden.

Theme	Impacts of Heathrow Expansion	Equality effects	Supporting draft HENPS policies and requirements
Transport and Connectivity	Improved public transport and surface access	Positive impacts on groups reliant on public transport (young people, older people, disabled people, women, carers, low-income households).	Requirements to: <ul style="list-style-type: none"> • Prepare a Surface Access Strategy; increase public transport usage; • Design for accessibility; and • Consider lived experience input.
	Increased accessibility	Positive impacts on groups with increased accessibility requirements such as older people, disabled people, pregnant people.	<ul style="list-style-type: none"> • Prepare a Surface Access Strategy; • Design for accessibility; and • Consider lived experience input
	Increased congestion and journey times during construction	Potential disproportionate negative impacts on low-income households, disabled people, older people and carers.	Requirements to: <ul style="list-style-type: none"> • Demonstrate no unacceptable impacts on road networks; • Prepare a Construction Traffic Management Plan.
	Severance and reduced access to services	Potential disproportionate negative impacts on children, older people, disabled people and women.	Requirements to: <ul style="list-style-type: none"> • Minimise community severance; • Engage with local authorities and communities.
	Road safety risks from construction traffic	Higher risks and negative effects for groups more vulnerable to road accidents, including children, older people and disabled people.	Requirements for Construction Traffic Management and community engagement.
Residents and communities	Community benefits from investment in services and facilities	Potential positive effects for groups facing labour market barriers and those reliant on local services.	Requirements to: <ul style="list-style-type: none"> • Engage with communities; • Replace community facilities; • Manage land use changes; • Provide a Community Compensation Package.

Theme	Impacts of Heathrow Expansion	Equality effects	Supporting draft HENPS policies and requirements
	Residential displacement due to CPO	Disproportionate negative impacts on older people, disabled people, low-income households and ethnic minority groups who may face more barriers to relocation.	Requirements to: <ul style="list-style-type: none"> • Provide financial compensation; • Manage land use changes; • Engage with affected communities.
	Loss or relocation of community facilities	Disproportionate negative impacts on children, young people, women older people, carers, disabled people and low-income households.	Requirements to: <ul style="list-style-type: none"> • Engage with communities; • Replace or re-provide community facilities; • Provide a Community Compensation Package.
	Construction-related disruption (noise, dust, severance)	Disproportionate negative impacts on children, older people, disabled people and ethnic minority groups.	Requirements to manage construction-related disruption (dust, noise, severance).
	Engagement and consultation barriers	Disproportionate negative impacts on ethnic minorities who may have language barriers when accessing consultation and engagement materials.	Engagement and consultation materials should be provided in English as well as other main languages spoken in the local authorities and communities.

Priority groups

- 5.1.53 The assessment recognises that equality impacts do not occur in isolation. Many individuals belong to more than one priority group, and the combined effect of multiple characteristics, vulnerabilities or spatial factors can intensify the scale or significance of impacts. In line with the approach set out in Chapter 2, the assessment therefore considers both **cumulative** and **intersectional** effects alongside the theme-based analysis.

Cumulative effects on priority groups

- 5.1.54 Cumulative effects arise where a priority group is exposed to more than one impact at the same time, or where several related impacts interact to create a greater overall effect. Within the Heathrow Expansion context, cumulative effects are most likely to occur where:
- Multiple environmental impacts are experienced (e.g. air quality, noise, dust, severance);
 - Both construction and operational impacts overlap spatially;
 - Priority groups are concentrated in areas experiencing several types of change;
 - Loss of services, facilities or employment interacts with environmental or transport disruption.
- 5.1.55 Based on the assessment outcomes, the following priority groups are most likely to experience cumulative effects:
- **Children** - due to combined sensitivity to air quality, noise, construction disturbance, severance and changes to community facilities, schools or play spaces.
 - **Older people** - due to higher sensitivity to noise and air quality, reliance on local services, and increased vulnerability to severance and relocation.
 - **Disabled people** - due to heightened sensitivity to environmental change, reliance on accessible transport and services, and barriers to relocation or navigating altered routes.
 - **Pregnant people** - due to increased vulnerability to air quality, noise and stress-related impacts.
 - **Ethnic minority groups** (especially Asian/Asian British) - where areas with disproportionate representation in the population experience multiple negative environmental or community impacts.
 - **Low-income households** - due to combined exposure to cost-of-living pressures, transport disruption, loss of local services and limited resilience to change.
- 5.1.56 Cumulative effects may be particularly pronounced in communities where several priority groups are over-represented and where multiple impacts coincide, such as areas close to the airport boundary, major roads or construction compounds.

Intersectional effects

5.1.57 Intersectional effects occur where individuals experience overlapping protected characteristics or socioeconomic disadvantage, resulting in compounded or amplified impacts. These effects are distinct from cumulative effects because they arise from the interaction of characteristics, not just the interaction of impacts.

5.1.58 Intersectional effects are particularly relevant where:

- Protected characteristics overlap with deprivation
- Reliance on local services and amenities is high;
- Relocation or severance disrupts informal support networks;
- Culturally specific services, facilities or businesses are affected; and
- Environmental impacts coincide with existing social vulnerability.

5.1.59 The assessment identifies several groups for whom intersectional effects are most likely:

- **Disabled people in low-income households** - who may face combined barriers to relocation, employment, transport access and resilience to environmental change.
- **Older ethnic minority residents** - who may experience combined age-related and other vulnerabilities to CPO and disproportionate exposure to noise, air quality and community change.
- **Young, ethnic minority people from deprived backgrounds** - who may face barriers to accessing skills and employment opportunities while also being more reliant on public transport and local services and living on a low income.
- **Low-income households with children (including single-parent households)** - who may face combined barriers to relocation, employment, transport access, reliance on local services and networks and sensitivities to environmental impacts.

6. Conclusions

- 6.1.1 This assessment has examined the potential equality impacts associated with the draft HENPS across the themes of Economic Growth, Health and Wellbeing, Transport and Connectivity, and Residents and Communities. It has applied the framework set out in Chapter 2 to identify differential, disproportionate and cumulative impacts on groups with protected characteristics and other priority groups. The assessment also considers how draft HENPS policies and requirements help to avoid, reduce or manage these impacts, and where further action may be required to support compliance with the Public Sector Equality Duty.
- 6.1.2 Overall, the assessment identifies a mix of potential positive and negative equality impacts. Positive impacts primarily relate to employment, skills, and connectivity benefits, which may support equality of opportunity for groups currently facing labour market barriers or limited access to affordable transport. This includes young people, ethnic minority groups, women and disabled people.
- 6.1.3 Negative impacts relate mainly to the loss and relocation of homes, employment and community facilities as a result of the planned CPO. Impacts also include environmental change, construction disruption, and severance, which may differentially affect children, older people, disabled people, pregnant people, and low-income households. Ethnic minority groups (particularly Asian/Asian British groups) form a disproportionately large share of the local population and may therefore experience disproportionate effects where impacts coincide with areas of higher representation.
- 6.1.4 The draft HENPS contains a comprehensive set of policy requirements that, if implemented effectively, provide a strong framework for managing and mitigating some of these impacts. These include requirements relating to air quality, noise, surface access, community compensation, land use, skills and economic growth. However, the assessment identifies several areas where additional clarity, evidence, or targeted measures would strengthen DCO applicants' ability to demonstrate due regard for the PSED and ensure that benefits and burdens of the Heathrow Expansion are more equitably distributed.
- 6.1.5 The assessment also highlights the importance of cumulative and intersectional considerations. Many priority groups experience multiple overlapping vulnerabilities, for example, disabled people in low-income households, older ethnic minority residents, or carers (predominantly women) reliant on local services. These groups are more likely to experience compounded impacts in which environmental, transport, economic, and community changes coincide. Addressing these combined effects requires targeted, evidence-based approaches and meaningful engagement with affected communities.

The Public Sector Equality Duty

- 6.1.6 In reviewing and updating the Heathrow Expansion NPS, the DfT has had due regard to the three limbs of the PSED as required under section 149 of the Equality Act 2010. This EqlA has supported that process by identifying potential differential, disproportionate, and cumulative impacts on protected characteristic groups and other priority groups, and by assessing the extent to which draft HENPS policies help avoid, reduce, or mitigate these impacts.

PSED Limb 1: To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act

- 6.1.7 The EqlA has not identified any direct discrimination against protected characteristic groups within the draft HENPS. However, a key consideration in demonstrating due regard under the first limb of the PSED is the potential for indirect discrimination arising from the compulsory acquisition of homes, land and businesses required to deliver the Heathrow Expansion. The assessment identifies that CPO-related impacts are among the most significant risks, with the potential to disproportionately affect older people, disabled people, low-income households, ethnic minority groups and minority-owned businesses. These groups may face greater barriers to relocation due to affordability issues, a high reliance on local community services and networks and a greater need for practical support.
- 6.1.8 The assessment has also identified a range of further potential indirect negative impacts, particularly relating to air quality, noise, construction activities, severance and transport disruption. These impacts may disproportionately affect children, older people, disabled people, pregnant people, ethnic minority groups and low-income households.
- 6.1.9 The draft HENPS includes a comprehensive set of policy requirements that help to avoid, reduce or minimise these effects. This includes the requirement for project-level EqlAs and health impact assessments. Other requirements relate to air quality, noise, surface access, community compensation, land use, dust and construction management.

PSED Limb 2: To advance equality of opportunity between people who share a protected characteristic and those who do not

- 6.1.10 The draft HENPS contains several requirements for applicants that support the advancement of equality of opportunity. These include requirements for applicants to:
- Assess employment, skills and supply chain opportunities;
 - Demonstrate how economic benefits will be realised locally, regionally and nationally;
 - Identify and manage adverse economic impacts;
 - Engage with local authorities, transport operators and communities; and
 - Improve accessibility in surface access and airport design.
- 6.1.11 These requirements help to ensure that the benefits of expansion, including employment, skills, training and improved access and connectivity, can be shared by groups who currently face barriers to

participation, such as young people, older people, disabled people, women, carers and certain ethnic minority groups.

- 6.1.12 Whilst the overall impact on employment and skills is positive, the extent to which underrepresented groups will benefit from employment opportunities and programmes will depend on targeted outreach and accessibility of opportunities available.

PSED Limb 3: Foster good relations between people who share a protected characteristic and those who do not.

- 6.1.13 Policies relating to community compensation, engagement, land use and amenity play an important role in maintaining community cohesion and addressing potential tensions arising from relocation, disruption or environmental change. Requirements for applicants to engage with affected communities throughout scheme development and to replace or re-provide community facilities where loss occurs, help support positive relationships between the applicant and local communities.
- 6.1.14 The assessment identifies that fostering good relations will depend on ongoing, meaningful engagement, particularly with groups who may be disproportionately affected or who rely on culturally specific services, informal support networks or community facilities. Engagement drawing on lived-experience input ensures that diverse voices are represented in design, mitigation, decision-making processes as well as in jobs created through the scheme.

Overall conclusion on due regard

- 6.1.15 The assessment demonstrates that DfT has given due regard to the three limbs of the PSED in updating the draft HENPS. The draft HENPS contains a strong set of policy requirements that help to avoid, reduce or mitigate negative impacts and support equality of opportunity.
- 6.1.16 EqIAs will be required at project level, and it is assumed that these assessments can make more detailed assessment of localised impacts and targeted recommendations.
- 6.1.17 The EqIA should be treated as a live document, and should be updated and refreshed, in line with further updates to the draft HENPS.

Appendix A Study area demographic profile

Protected characteristics

Sex

The DSA has a slightly higher proportion of male residents (51%) compared to all other geographies (49%).⁷⁵

Age

Table A-1 provides an age breakdown by geographical area using data from the 2021 Census.⁷⁶

Among all the geographies covered in this Scoping Report, the DSA has the highest proportion of children (22% aged under 16) and the lowest proportions of both young people (9% aged 16–24) and older residents (9% aged 65+). The most notable difference across the geographies is in the share of elderly residents: whilst they account for 9% of the population in the DSA, they make up 14% of the WSA, 12% of London, 19% of Southeast England, and 18% of England overall.

The proportion of working-age residents (16-64 years old) is comparable throughout the region (67-69%), but higher than the national proportion (63%).

Table A-1. Age Breakdown by Geographical Area, 2021

	DSA	WSA	London	Southeast England	England
Children (0-16)	22%	20%	19%	19%	19%
Young People (16-24)	9%	11%	11%	10%	11%
Working Age (16-64)	69%	67%	69%	69%	63%
Elderly (65+)	9%	14%	12%	19%	18%

Disability

The DSA has a noticeably lower proportion of residents that are considered disabled under the Equality Act (11%) compared to the Southeast of England (16%) and England (17%). The proportion of residents that are considered disabled in the DSA is relatively comparable to the WSA and that of London (13%).⁷⁷

In both the DSA and WSA, a slightly smaller proportion of residents (5%) report that their day-to-day activities are significantly limited by their disability compared to the surrounding regions (6%) and nation (7%). Table A-2 further illustrates how illness or disability impacts the population of each geographical area using data from the 2021 Census.

⁷⁵ Nomis (2021). Sex. Available at: [Nomis - Query Tool - TS008 - Sex](#)

⁷⁶ Nomis (2021). Age by five-year age bands. Available at: [Nomis - Query Tool - TS007A - Age by five-year age bands](#)

⁷⁷ Nomis (2021). Disability. Available at: [Nomis - Query Tool - TS038 - Disability](#)

Table A-2. Limiting Long-term Illness or Disability by Geographical Area, 2021

	DSA	WSA	London	Southeast England	England
Day-to-day activities limited a lot	5%	5%	6%	6%	7%
Day-to-day activities limited a little	6%	7%	7%	10%	10%
Day-to-day activities not limited	89%	87%	87%	84%	83%

Ethnic Group

Table A-3 summarises ethnic group representation across each geographical area using data from the 2021 Census.⁷⁸

The DSA has the highest proportion of residents that identify as ethnic minorities (57%), significantly higher than that within Southeast England (14%) and the whole of England (19%). The WSA (47%) and London (46%) also have a relatively large ethnic minority population.

The largest non-White population in both the DSA and WSA are residents of Asian, Asian British, or Asian Welsh descent, at 41% and 31% of the areas' populations, respectively. This is a much higher proportion than in London (21%), Southeast England (7%), and whole of England (10%).

The DSA and WSA also have a higher proportion of residents that are Black, Black British, Black Welsh, Caribbean or African (6%), from Mixed or Multiple Ethnic Groups (4%), or report belonging to another ethnic group (5%) than the Southeast and whole of England; however, these ethnic groups each have the greatest representation in London.

Table A-3. Ethnic Group by Geographical Area, 2021

	DSA	WSA	London	Southeast England	England
Asian, Asian British, or Asian Welsh	41%	31%	21%	7%	10%
Black, Black British, Black Welsh, Caribbean, or African	6%	6%	14%	2%	4%
Mixed or Multiple Ethnic Groups	4%	4%	6%	3%	3%
White	43%	53%	54%	86%	81%
Other Ethnic Group	5%	5%	6%	1%	2%

⁷⁸ Nomis (2021). Ethnic group. Available at: [Nomis - Query Tool - TS021 - Ethnic group](#)

Religion

The DSA has the highest proportion of residents that identify as practicing a religion (80%), followed by the WSA (73%). Across all geographies, Christianity is the most practiced religion, however the DSA and WSA have greater religious diversity. In the DSA, 35% of residents practice a religion other than Christianity, and in the WSA, this proportion is 33%. Both the DSA and WSA areas have a relatively high proportion of residents identifying as Muslim (15%), Hindu (7-8%), and Sikh (8-11%).⁷⁹

Table A-4 provides a complete breakdown of religious participation across each geography using 2021 census data.

Table A-4. Religious Breakdown by Geography, 2021

	DSA	WSA	London	Southeast England	England
No Religion	15%	21%	27%	40%	37%
Christian	45%	41%	41%	46%	46%
Buddhist	1%	1%	1%	1%	0%
Hindu	7%	8%	5%	2%	2%
Jewish	0%	0%	2%	0%	0%
Muslim	15%	15%	15%	3%	7%
Sikh	11%	8%	2%	1%	1%
Other Religion	1%	1%	1%	1%	1%
Not Answered	5%	6%	7%	6%	6%

Pregnancy and Maternity

Both the Hillingdon and Slough local authority districts have higher birth rates than the wider study area, surrounding region, and nation. Hillingdon recorded 12.9 live births per 1,000 residents, and Slough 14.1 live births per 1,000 residents. Hounslow has the next highest birth rate (12.4), followed by Spelthorne (10.3) and Windsor and Maidenhead (8.5).

For comparison, the London birth rate is 11.7 live births per 1,000 residents, Southeast England birth rate is 9.1 live births per 1,000 residents, and England birth rate is 9.7 live births per 1,000 residents.⁸⁰

Gender Identity

Table A-5 provides a breakdown of residents' gender identity across each geographical area using 2021 census data. Census data was available at the local authority district only; not at the ward level.⁸¹

In Hillingdon and Slough, 0.88% and 0.91%, respectively, of the population identifies as a different gender than their sex registered at birth. This is comparable to London (0.91%). This includes transgender women, transgender men, non-binary individuals, those who indicated they identify differently from their sex registered at birth but did not provide a specific identity, and all other gender identities. Only

⁷⁹ Nomis (2021). Religion. Available at: [Nomis - Query Tool - TS030 - Religion](#)

⁸⁰ Office for National Statistics (2024). Births in England and Wales: birth registrations. Available at: [Births in England and Wales: birth registrations - Office for National Statistics](#)

⁸¹ Nomis (2021). Gender identity. Available at: [Nomis - Query Tool - TS078 - Gender identity](#)

0.55% of the total English population identifies as a different gender than their sex registered at birth.

Within the WSA, Hounslow has the highest gender diversity of all five local authority districts, with 1.02% identifying as a different gender than their sex registered at birth; Windsor and Maidenhead has the lowest, at 0.33% of the population.

Table A-5. Gender Identity by Geographical Area, 2021

	DSA	WSA	London	Southeast England	England
Gender Identity the Same as Sex Registered at Birth	91.27%	91.79%	91.21%	94.12%	93.47%
Gender Identity Different from Sex Registered at Birth but No Specific Identity Given	0.49%	0.42%	0.46%	0.18%	0.25%
Trans Woman	0.17%	0.15%	0.16%	0.09%	0.10%
Trans Man	0.18%	0.17%	0.16%	0.09%	0.10%
Non-binary	0.03%	0.03%	0.08%	0.07%	0.06%
All Other Gender Identities	0.02%	0.02%	0.05%	0.04%	0.04%
Not Answered	7.85%	7.42%	7.88%	5.42%	5.98%

Sexual Orientation

All the local authority districts comprising the DSA and WSA have a smaller proportion of residents that identify as belonging to the LGBTQ+ community as the surrounding regions and nation. In this assessment, Gay or Lesbian, Bisexual, Pansexual, Asexual, Queer, and all other sexual orientations are considered part of the LGBTQ+ community.⁸²

Hounslow has the greatest proportion of LGBTQ+ residents (2.7%), and Slough the least (1.7%). The national proportion is 3.0%.

Legal Partnership Status

The proportion of residents in both the DSA and WSA that are married or registered in a civil partnership (49%) is higher than that of the surrounding regions. For comparison, 40% of London, 48% of Southeast England, and 45% of England residents are married or registered in a civil partnership.⁸³

⁸² Nomis (2021). Sexual orientation (detailed). Available at: [Nomis - Query Tool - TS079 - Sexual orientation \(detailed\)](#)

⁸³ Nomis (2021). Legal partnership status. Available at: [Nomis - Query Tool - TS002 - Legal partnership status](#)

Socioeconomic profile

The socio-economic profile considers several factors including levels of deprivation, employment, education, health, housing, transport, and connectivity; as well as access to services and facilities; public realm and open space; safety, security and well-being; and community cohesion. These factors are pertinent to those with protected characteristics and inequality and, as such, provide additional baseline information relevant to the assessment of equality impacts.

Index of Multiple Deprivation (IMD)

IMD is assessed at the lower layer super output area (LSOA) level. LSOAs are geographical units in England used for statistical purposes, and each LSOA typically has a minimum population of 1,000 residents and an average of 1,500 residents. The 33,755 LSOAs in England are ranked by their quantified level of deprivation, where a lower rank represents a more deprived LSOA. The LSOAs also are assigned to deciles, such that an LSOA in the first decile is in the top 10% most deprived of LSOAs; the 50% decile represents the median (middle) level of deprivation assessed by the IMD.⁸⁴

The Heathrow Villages ward is comprised of seven LSOAs, and the Colnbrook with Poyle ward of four. All but two of the LSOAs are more deprived than the England median. Four of the LSOAs are within the top 20% most deprived LSOAs in England.

The IMD considers seven domains of deprivation: income; employment; education; health; crime; barriers to housing and services; and living environment. In computing the IMD, each of the LSOAs is assigned a score and associated percentile for each of these domains. Of these domains, the DSA shows the greatest deprivation with respect to housing and services. Eight of the eleven LSOAs fall in the first decile with respect to this domain (i.e., are in top 10% most deprived of LSOAs with respect to this domain), and the remaining three LSOAs are in the second decile. The DSA also is relatively deprived respect to living environment, as ten of the eleven LSOAs are within the top 30% of the most deprived LSOAs with respect to this domain (i.e., their deprivation scores for this domain fall between the first and third deciles).

On the contrary, the DSA enjoys a relatively low prevalence of poor health, illness, disability, and premature death. The LSOAs fall between fourth to ninth deciles for health deprivation domain.

⁸⁴ Ministry of Housing, Communities & Local Government (2025). English indices of deprivation 2025: statistical release. Available at: [English indices of deprivation 2025: statistical release - GOV.UK](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2025)

Table A-6. IMD Rankings

LSOA Name	Ward	Rank							
		IMD	Income	Employment	Education and Skills	Health and Disability	Crime	Barriers to housing and Services	Living Environment
Hillingdon 029A	Heathrow Villages	4,178	4,476	7,883	5,502	10,890	3,272	330	9,956
Hillingdon 031A	Heathrow Villages	6,626	7,093	16,408	8,593	15,673	22,352	12	1,903
Hillingdon 031B	Heathrow Villages	13,068	12,602	26,371	10,594	27,578	11,185	1,461	7,083
Hillingdon 031C	Heathrow Villages	8,232	9,950	16,709	7,085	21,391	15,312	336	3,710
Hillingdon 032A	Heathrow Villages	9,065	10,214	18,322	10,682	27,189	10,426	437	3,030
Hillingdon 032B	Heathrow Villages	9,114	8,469	18,780	6,459	24,651	7,810	1,893	5,571
Hillingdon 032C	Heathrow Villages	6,714	6,276	13,380	8,722	19,282	9,854	164	6,227
Slough 014A	Colnbrook with Poyle	13,989	10,947	17,706	13,292	28,475	11,743	4,474	11,516
Slough 014B	Colnbrook with Poyle	6,236	6,164	8,439	9,138	11,329	2,186	4,922	9,599
Slough 014C	Colnbrook with Poyle	10,773	10,234	16,712	12,661	22,253	4,570	4,021	7,159
Slough 014D	Colnbrook with Poyle	17,492	16,598	22,875	14,581	27,874	27,259	3,159	8,888

Income

Relative low-income is defined as a family whose equivalised income is below 60% of contemporary median income. Gross income measure is Before Housing Costs (BHC) and includes contributions from earnings, state support and pensions.

The median gross annual income of all five local authority districts comprising the DSA and WSA are above the national median (£33,080). Spelthorne has the highest median gross annual income (£37,918) and Hounslow the lowest (£35,301). The mean gross annual income for all five local authority districts is higher than the median, meaning there are greater outliers in higher income brackets. Windsor and Maidenhead has the greatest difference between its mean and median gross annual incomes (£20,013) and Slough the least difference (£3,745). Slough is the only local authority district of the five to have a lower mean gross annual income (£39,266) than the English average (£41,038).⁸⁵

Importantly, both Heathrow Villages (22.8%) and Colnbrook with Poyle (21.9%) have higher percentages of children living in low-income families than the surrounding regions (17.8% in London and 14.5% in the Southeast of England).⁸⁶

⁸⁵ Office for National Statistics (2025). Earnings and hours worked, place of residence by local authority: ASHE Table 8. Available at: [Earnings and hours worked, place of residence by local authority: ASHE Table 8 - Office for National Statistics](#)

⁸⁶ Department for Work and Pensions (2024). Children in low income families: local area statistics 2014 to 2024. Available at: [Children in low income families: local area statistics 2014 to 2024 - GOV.UK](#)

Employment

Employment within the DSA is skewed towards less skilled professions than elsewhere in the region and nation. Nearly double the proportion of residents in the DSA (20%) are in elementary occupations compared to the WSA (11%), surrounding regions (9%), and nation (10%); the DSA also has a higher proportion of residents serving as process, plant, and machine operatives (12%). Conversely, nearly half the population of residents in the DSA (11%) are in professional occupations as compared to the WSA (21%), surrounding regions (21-26%) and nation (20%); the DSA also has a lower proportion of residents serving as managers, directors, and senior officials (10%).⁸⁷

However, the DSA has a higher proportion of residents that are economically active (70%) than the WSA (65%), surrounding regions (62-67%) and nation (61%). Of those within the DSA that are economically inactive, most are retired (10%) or looking after home or family (7%). Table A-7 provides a further breakdown of resident economic activity across each geography using 2021 Census data.⁸⁸

⁸⁷ Nomis (2021). Occupation. Available at: [Nomis - Query Tool - TS063 - Occupation](#)

⁸⁸ Nomis (2021). Economic activity status. Available at: [Nomis - Query Tool - TS066 - Economic activity status](#)

Table A-7. Economic Activity Breakdown by Geography, 2021

	DSA	WSA	London	Southeast England	England
Economically Active (Excluding Full-time Students)	67%	63%	64%	60%	59%
Economically Active and a Full-time Student	3%	2%	3%	2%	2%
Economically Inactive: Retired	10%	16%	13%	22%	21%
Economically Inactive: Student	5%	6%	7%	5%	6%
Economically Inactive: Looking After Home or Family	7%	6%	6%	4%	5%
Economically Inactive: Long-term Sick or Disabled	3%	3%	4%	3%	4%
Economically Inactive: Other	5%	4%	4%	3%	3%

Education, skills and training

DSA residents are less educated than elsewhere in the region and nation. A greater proportion of residents in the DSA have no qualifications (21%) or Level 1 and entry level qualifications (10%) compared to all other geographies, and a notably lower proportion have Level 4 qualifications or above (32%).⁸⁹

Health

The life expectancy for both men and women is higher than the national average in four of the five local authority districts comprising study area; only Slough has lower life expectancies. Slough also is the only local authority district with overall (i.e., from all causes) and cardiovascular under 75 mortality rates above those of England, though its under 75 mortality rate for cancer is lower than that of England and some of the neighbouring local authority districts. Spelthorne and Hillingdon both have higher under 75 mortality rates for cancer. With respect to mental health, all five local authority districts have a suicide rate lower than the national rate, and lower prevalence of emergency hospital admissions for intentional self-harm.

There is notable variation in the prevalence of behavioural risk determinants of health across the five local authority districts relative to the national prevalence. Hounslow (590 admissions per 100,000 residents), Spelthorne (571), and Hillingdon (525) have a higher rate of admissions for alcohol-related conditions than that of England (504), whereas Slough (459) and Windsor and Maidenhead (389) have

⁸⁹ Nomis (2021). Highest level of qualification. Available at: [Nomis - Query Tool - TS067 - Highest level of qualification](#)

lower admissions rates. Smoking is slightly more prevalent in adults aged 18 and over in Spelthorne (10.8%) and Hillingdon (10.6%) than nationally (10.4%), but less prevalent in Hounslow (8.1%), Slough (6.8%), and Windsor and Maidenhead (6.7%). Only Windsor and Maidenhead has a higher percentage of physically active adults (74.1%) than in England (67.4%); Hillingdon has the lowest percentage of the remaining local authority districts (56.2%). Finally, only Slough has a higher percentage of overweight adults (70.6%) than in England (64.5%); of the remaining local authority districts, Spelthorne has the lowest percentage (55.3%).⁹⁰

Interestingly, despite these measured differences in health, DSA and WSA residents would categorise themselves-when asked to rate their health and very good, good, fair, bad, or very bad-as being in similar overall health to the surrounding regions and nation. Within both study areas, 86% of residents rated their health as very good or good, compared to only 4% as bad or very bad.⁹¹

Population

Both the DSA and WSA experienced greater population growth (11%) than that of the region and nation (7-8%) between 2011 and 2021. The most notable increase was within Heathrow Villages. The ward's population increased by 15% between 2011 and 2021.^{92,93}

Local services and amenities

The DSA is home to a number of local services and amenities, including:

- Wonderland Day Nursery and Heathrow and Harmondsworth Primary Schools;
- Harmondsworth & Longford and Sipson Community Centres;
- Harmondsworth Moor, Harmondsworth and Sipson Recreation Grounds, and Heathrow Close Children's Playground;
- Heathrow Medical Centre;
- The Landon Harmondsworth School for students with special needs and Heathrow Special Needs Centre;
- Skyport Trade Park, Compass Centre, and Heathrow Boulevard office parks; and
- Heathrow Polar Park Police Station.

These local services and amenities were identified from a Google Maps search of the area coinciding with the preferred expansion site, roughly bounded by the M4 to the north and east, M25 to the west, and Airport Way and Heathrow Airport to the south.

Relocation of housing and community facilities can decrease accessibility of these key services and amenities, as well as reduce community cohesion.

⁹⁰ Department of Health and Social Care (2025). Local Authority Health Profiles. Available at: [Local Authority Health Profiles - Data | Fingertips | Department of Health and Social Care](#)

⁹¹ Nomis (2021). General health. Available at: [Nomis - Query Tool - TS037 - General health](#)

⁹² Nomis (2011). Usual resident population. Available at: [Nomis - Query Tool - KS101EW - Usual resident population](#)

⁹³ Nomis (2021). Number of usual residents in households and communal establishments. Available at: [Nomis - Query Tool - TS001 - Number of usual residents in households and communal establishments](#)

Appendix B Screening

EqlA Screening Questions

This section applies the screening questions from Table 5-1 of the Scoping Report to the draft HENPS, to determine whether the policy framework as a whole has the potential to disproportionately or differentially affect protected characteristics groups.

Economic growth

Q1. Is the draft HENPS likely to result in significant new employment and training opportunities at local regional, and national levels?

Yes.

The draft HENPS sets the policy framework for a nationally significant infrastructure project. It anticipates significant employment, skills and supply-chain opportunities during both construction and operation, including apprenticeships and early-career routes.

Are these opportunities likely to promote equality of opportunity?

Potentially, but this depends on the delivery of the expansion and consideration of equality impacts. The draft NPS sets expectations for maximising employment and skills opportunities and expects promoters to set out credible plans (e.g., skills/apprenticeship delivery and an economic growth strategy). Equality of opportunity will be strengthened where recruitment and training are accessible (including for disabled people and people with non-visible impairments), where transport access is affordable, and where engagement and programme design involve people with lived experience. Without targeted measures, some groups could still face barriers to accessing training and employment opportunities.

Q2. Does the draft HENPS have the potential to change local, regional and national economies?

Yes.

The draft HENPS identifies potential for the scheme's construction and operation to generate economic benefits across the country (e.g., productivity, trade and tourism effects, and supply-chain activity). It requires the applicant to assess economic impacts and to develop an economic growth strategy demonstrating how benefits will be realised at national, regional and local levels, including managing adverse effects.

Are these changes likely to disproportionately disadvantage priority groups?

Potentially.

Economic benefits may not be evenly distributed, and some communities could experience adverse effects (e.g., disruption, environmental exposure, affordability pressures) that interact with socio-economic disadvantage. The draft HENPS' requirement for an economic growth strategy provides a mechanism to identify distributional risks and put in place measures to widen access to opportunities and

manage adverse impacts, but disproportionate impacts may arise and should be addressed through delivery commitments.

Q3. Could any groups be excluded from accessing these opportunities?

Yes. Priority groups could be excluded without inclusive delivery measures.

The draft HENPS requires a project-level Equality Impact Assessment and sets expectations on accessibility and inclusive design (including implementation of the Aviation Accessibility Task and Finish Group recommendations). Barriers could still arise for disabled people (including non-visible impairments), carers, people with limited transport options, and some ethnic minority groups if recruitment, training, surface access and engagement processes are not designed to be accessible and affordable.

Health & Wellbeing (Air Quality, Noise, Climate)

Q4. Is the draft HENPS likely to result in significant changes to air quality or noise changes at local or regional levels?

Yes.

The draft HENPS recognises that construction and operation could increase emissions and noise and therefore requires robust air quality and noise assessments and mitigation, including meeting the Government's air quality and noise tests.

Yes.

Children, older people, disabled people, pregnant people and deprived communities are more vulnerable.

Q5. Is the draft HENPS likely to result in wellbeing changes for local communities?

Yes, potentially. The draft HENPS recognises that wellbeing effects (e.g., from noise, air quality, surface access/severance, and broader disruption) may not be experienced equally across communities, and it requires project-level assessment and mitigation/monitoring (including via HIA/EIA) to identify and address cumulative and distributional impacts.

Could impacts be differential or disproportionate?

Yes. The draft HENPS recognises health, quality of life and community impacts (including severance, access to services/open space, and displacement/compensation issues), which can differentially affect protected groups and those facing socio-economic disadvantage. A project-level HIA and EqlA are required to identify cumulative and distributional effects and to secure mitigation and monitoring.

Q6. Is the draft HENPS likely to contravene climate change obligations?

No (provided compliance is demonstrated at project stage).

The draft HENPS is framed around alignment with the UK's strengthened climate obligations (net zero and carbon budgets) and requires detailed project-level assessment and mitigation. It expects a Whole Life Carbon Assessment, quantification of greenhouse gas impacts (including relevant indirect emissions), and a carbon management plan applying the carbon reduction hierarchy. An individual scheme could still be refused if it would materially

hinder meeting legal targets; therefore, compliance must be evidenced through the DCO assessments and mitigations.

Transport & Connectivity

Q7. Is the draft HENPS likely to change access to public transport, active travel or road networks?

Yes.

The draft HENPS requires a surface access strategy with targets to increase public transport and active travel mode share and to reduce staff car trips, alongside associated road and rail interventions. Construction and operation will therefore change access and conditions on road, rail, bus/coach and active travel networks.

Could impacts be differential or disproportionate?

Yes.

Construction traffic, diversions and land-take may create barriers for disabled people, older people and children.

Q9. Are any priority groups more reliant on specific modes?

Yes.

Different groups rely on different modes: low-income households may depend more on public transport and affordable options; disabled and less mobile people may require step-free rail/bus access, high-quality assistance services, and may also rely on private vehicles where alternatives are not accessible. Mode share interventions (e.g., charging, parking policies) therefore have potential distributional and accessibility implications.

Q10. Is the draft HENPS likely to result in the displacement of local residents?

Yes.

The draft HENPS anticipates land take and compulsory acquisition, including impacts on homes and community assets, and requires compliance with compulsory acquisition guidance and provision of compensation and engagement arrangements.

Is this likely to differentially or disproportionately affect priority groups?

Potentially, yes.

Displacement and compulsory acquisition can disproportionately affect groups who have fewer housing options, rely on local support networks, or need accessible housing (e.g., disabled people and older people). Impacts can also interact with deprivation. The draft HENPS includes expectations on compensation and engagement, but distributional effects and accessibility of processes should be assessed through the EqIA.

Could the draft HENPS lead to land-take, displacement or changes to local services?

Yes.

The draft HENPS enables a scheme involving land acquisition, demolition, relocation and changes to community infrastructure.

Is this likely to differentially or disproportionately affect priority groups?

Potentially, yes.

Land take, demolition and changes to open space/green infrastructure and local services can disrupt access, increase severance and reduce amenity. These effects may be more challenging for people with mobility impairments, carers, and households with limited transport options. The draft HENPS expects mitigation/compensation for green infrastructure and open space impacts and sets out community compensation and engagement requirements, but proportionality should be tested through the EqlA and project design.

Screening by policy chapter

Table B-1 Screening Outcomes by draft HENPS Chapter

Draft HENPS Chapter	Screening Outcome	Rationale
1. Introduction & Purpose	Screened out	Screened out - largely contextual and procedural, setting out the purpose, scope and statutory context for the draft HENPS review and associated assessments. It does not, in itself, introduce measures that would be expected to create differential or disproportionate effects on protected characteristic groups; potential equalities effects arise from the substantive policy and assessment requirements in later chapters.
2. Need for Additional Airport Capacity	Screened in	Screened in - establishes the needs case and strategic rationale (including the Government's four tests) and frames how national and regional benefits are expected to arise. Economic and connectivity benefits may be unevenly distributed across regions and population groups, and the needs case can influence the balance between benefits and local adverse effects. Requires consideration of who benefits (e.g., working-age adults/young people via jobs and skills) and who may be adversely affected (e.g., groups facing socio-economic disadvantage).
3. Case for the Northwest Runway Scheme	Screened in	Screened in - describes the scheme and its likely direct and indirect pathways for equalities effects, including land-take/compulsory acquisition, construction disruption, changes to surface access, and operational environmental effects (noise and air quality). Given the presence of priority groups within the Direct and Wider Study Areas (including children, ethnic minority groups and deprived communities),

		effects may be differential and/or disproportionate. Requires full assessment of distributional impacts and mitigation/compensation arrangements.
4. Assessment Principles	Screened in	Screened in – sets the assessment and decision-making framework, including requirements for project-level Equalities and Health assessment, accessibility and inclusive design expectations, and the mitigation hierarchy. These principles influence whether adverse effects on protected characteristic groups are identified, avoided, reduced and mitigated, and whether engagement and evidence are sufficiently robust. Adequacy and accessibility of these requirements (including for disabled people and people with non-visible impairments) requires full EqlA consideration.
5. Surface Access	Screened in	Screened in - includes requirements and expectations for surface access changes, mode share targets and associated highway/rail/bus and active travel interventions. Construction and operational traffic, diversions and infrastructure works can create severance and accessibility barriers and may affect affordability and reliability of access to the airport and local services. Impacts are more likely to be differential/disproportionate for disabled people, older people, children, carers and low-income households, who may have greater reliance on accessible public transport or local networks.
6. Air Quality	Screened in	Screened in - air quality is a key determinant of health and wellbeing and the draft HENPS strengthens assessment and mitigation expectations linked to legal obligations and targets. Changes in exposure can disproportionately affect children, older people, pregnant people, disabled people and communities experiencing deprivation and/or higher baseline exposure. Requires full EqlA consideration of exposure patterns, sensitive receptors and the effectiveness and accessibility of mitigation measures.
7. Noise	Screened in	Screened in - aircraft, ground operations and surface transport noise can affect sleep, learning and health, with evidence of increased sensitivity for children, older people, disabled people and shift workers. The draft HENPS includes

		strengthened noise management requirements (e.g., assessment, mitigation and monitoring), which will shape distributional outcomes. Full EqIA is required to consider who is exposed, potential changes in respite, and accessibility of mitigation/compensation for affected receptors such as schools and homes.
8. Climate Change Mitigation	Screened in	Screened in - climate mitigation requirements (net zero and carbon budgets) and adaptation measures can have distributional effects, including implications for vulnerable groups (e.g., low-income households, older people, disabled people) through exposure to extreme weather risks, energy/fuel poverty and access to low-carbon transport. The draft HENPS requires detailed project-level carbon assessment (including whole life carbon) and mitigation planning, which should be assessed for fairness and potential unintended equalities effects.
9. Economic Growth Across the Country	Screened in	Screened in - sets expectations for demonstrating and maximising national/regional economic benefits (jobs, supply chain, productivity and connectivity), including through an economic growth strategy. Positive impacts may not be shared equally without inclusive delivery, and some groups may face barriers to accessing new jobs and skills opportunities. Full EqIA is required to consider equality of opportunity, access to training, and any adverse socio-economic effects for communities experiencing disruption or affordability pressures.
10. Environmental Topics (biodiversity, land use, water, flood risk, historic environment, landscape)	Screened in	Screened in - environmental topics can affect community wellbeing and access to environmental goods (e.g., open space/green infrastructure, flood resilience, water quality) and may interact with socio-economic disadvantage. Loss or changes to open space, rights of way, landscape/amenity and environmental risks can disproportionately affect mobility-limited groups, carers, children and deprived communities with fewer alternatives. Full EqIA is required to consider distribution of these effects and adequacy of mitigation/compensation and engagement.

<p>11. Community Compensation & Engagement</p>	<p>Screened in</p>	<p>Screened in - compensation schemes, eligibility criteria and engagement processes affect the ability of affected residents and communities to understand options, exercise rights and access support. There is potential for differential impacts if processes are not inclusive (e.g., accessibility needs, language/digital barriers, time constraints for carers, trust and community cohesion issues). Full EqlA should consider whether engagement and compensation arrangements are accessible, equitable and responsive to priority groups.</p>
<p>12. Skills</p>	<p>Screened in</p>	<p>Screened in - skills, apprenticeships and workforce programmes can advance equality of opportunity if designed and delivered inclusively, particularly for young people, low-income households and underrepresented groups. However, benefits are not guaranteed and depend on accessible entry routes, training provision, transport connectivity, and employer commitments. Full EqlA should consider who benefits, barriers to participation (including disability and caring responsibilities), and how progress will be monitored and reported.</p>

Screening summary

The screening findings demonstrates that the draft HENPS has the potential to generate both positive and negative equality effects and therefore requires a full EqlA. The draft HENPS is expected to create employment, training and wider economic opportunities, but these benefits may not be realised equally across protected characteristic groups without inclusive delivery. At the same time, the draft HENPS enables changes that may result in differential and/or disproportionate impacts on priority groups - particularly through air quality and noise exposure, surface access changes (including potential severance and accessibility barriers), and land take/compulsory acquisition and associated disruption to homes, community facilities and services. Screening by policy chapter therefore screens in all substantive chapters (with procedural introductory material screened out), to ensure distributional effects, accessibility considerations, mitigation and compensation arrangements, and inclusive engagement are assessed and appropriately addressed through the full EqlA process.

Appendix C Assessment of impacts by protected characteristic group

Table C-1 Impacts by protected characteristics

Protected characteristic	Positive Impacts	Negative Impacts
Age – Children	<ul style="list-style-type: none"> Potential long-term benefits from improved local services and community facilities (if effectively re-provided). 	<ul style="list-style-type: none"> Higher sensitivity to air pollution, noise, dust and construction activities Increased road safety risks from construction traffic. Disruption to schools or childcare if facilities are relocated. Greater impacts from severance affecting access to services and play spaces.
Age – Young people	<ul style="list-style-type: none"> Access to new jobs, apprenticeships and early-career opportunities. Improved public transport access to Heathrow for work and training. 	<ul style="list-style-type: none"> Barriers to accessing higher-skilled roles if inclusive pathways are not provided. Disproportionate impacts from job losses if local businesses close.
Age – Older people	<ul style="list-style-type: none"> Potential improvements to community facilities and public realm. 	<ul style="list-style-type: none"> Higher sensitivity to air quality, noise and construction disturbance. Greater risk of isolation from severance or relocation. Financial, emotional and practical barriers to relocating if homes are compulsorily acquired. Reduced access to local services during construction.
Disability	<ul style="list-style-type: none"> Potential improvements to accessibility if inclusive design is delivered effectively. New employment opportunities if barriers are addressed. 	<ul style="list-style-type: none"> Higher sensitivity to air quality, noise, dust and construction impacts. Disproportionate effects from severance, inaccessible routes or changes to public transport. Practical barriers to relocating homes due to CPO Reduced access to local services during construction.
Gender reassignment	<ul style="list-style-type: none"> No direct positive impacts identified in the assessment. 	<ul style="list-style-type: none"> No direct negative impacts identified; only potential indirect effects where community facilities, safe spaces or support networks are affected.
Marriage / civil partnership	<ul style="list-style-type: none"> No direct positive impacts identified in the assessment. 	<ul style="list-style-type: none"> No direct negative impacts identified
Pregnancy / maternity	<ul style="list-style-type: none"> Potential benefits from improved local services and public transport access. 	<ul style="list-style-type: none"> Higher sensitivity to air pollution, stress and anxiety Increased vulnerability to construction-related disruption. Potential reduced access to local health or maternity services if facilities are relocated.
Race – ethnic minority groups	<ul style="list-style-type: none"> Potential employment benefits if barriers are addressed. 	<ul style="list-style-type: none"> Disproportionate exposure to air quality and noise impacts due to spatial distribution. Greater risk of business displacement for minority-owned SMEs. Disruption to culturally specific services or community facilities.

Protected characteristic	Positive Impacts	Negative Impacts
Religion / belief	<ul style="list-style-type: none"> Potential improvements to community facilities if re-provided effectively. 	<ul style="list-style-type: none"> Loss or relocation of places of worship or culturally specific community spaces. Disproportionate impacts where faith communities are concentrated in affected areas.
Sex – women	<ul style="list-style-type: none"> Potential employment benefits if inclusive recruitment is delivered. 	<ul style="list-style-type: none"> Disproportionate impacts from severance, reduced public transport reliability and safety concerns. Greater impacts on women with caring responsibilities if services or facilities are disrupted.
Sex – men	<ul style="list-style-type: none"> Potential employment benefits in the construction and aviation sectors. 	<ul style="list-style-type: none"> Disproportionate job losses if male-dominated local businesses are displaced.
Sexual orientation	<ul style="list-style-type: none"> No direct positive impacts identified in the assessment. 	<ul style="list-style-type: none"> No direct negative impacts identified; only potential indirect effects where LGBTQ+ community spaces or support services are displaced or harder to access.

