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Appraisal of Sustainability (AoS) for the Draft Heathrow Expansion National Policy Statement

Non-technical statement

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Non-technical summary

NTS1. Introduction to the Non-Technical Summary and the Appraisal of Sustainability

This Non-Technical Summary (NTS) explains the main findings of the Appraisal of Sustainability (AoS) for the draft Heathrow Expansion National Policy Statement (HENPS).

The AoS is a structured process used to identify and assess the likely environmental, social and economic effects of a policy. Its purpose is to inform decision-making and ensure that sustainability considerations are taken into account in a clear and transparent way.

This NTS provides a clear, non-technical overview so that readers can understand...:

- ...what is being proposed;
- ...what impacts may occur; and
- ...how these impacts could be managed.

The NTS is intended to be read as a standalone document, without needing to refer to the full AoS Report.

Accompanying studies

The AoS is one of several assessments prepared to inform the draft HENPS, including:

- Habitats Regulations Assessment (HRA) - effects on protected sites;
- Equality Impact Assessment (EqIA) - impacts on different groups; and
- Health Impact Analysis (HIA) - impacts on public health.

These assessments consider different aspects but use a shared evidence base.

Understanding this report

- **Significant effect:** an impact important enough to influence decisions.
- **Adverse / beneficial effects:** 'negative' / 'positive' effect.
- **Mitigation:** measures to avoid, reduce or offset harm.
- **No-expansion scenario:** Heathrow continues operating with two runways.

NTS2. What is the draft HENPS?

The draft HENPS sets out Government policy for the expansion of Heathrow Airport. It establishes the framework that will guide decisions on any future application for development consent, including the types of impacts that must be considered and how they should be managed.

It is important to note that the draft HENPS does not grant permission for development. Any proposal for expansion must still go through a separate planning process, including detailed environmental assessment.

The final HENPS will replace the Airports National Policy Statement (ANPS) designated in 2018. It reflects changes since that time, including strengthened climate commitments, updated environmental policy, and new evidence on the impacts of aviation and infrastructure development.

The draft HENPS is underpinned by four Government tests for expansion: these are based on whether the scheme supports economic growth; can be consistent with climate change commitments; avoid unacceptable impacts on air quality; and limit noise impacts on communities. These tests provide an important context for the AoS and the policy framework.

NTS3. What has the AoS involved so far?

The AoS has been carried out in a series of stages.

First, a scoping process was undertaken to identify the key sustainability issues and to define the framework for the assessment. This included consultation with statutory bodies such as Natural England, the Environment Agency and Historic England.

The AoS then considered reasonable alternatives. These are different ways of achieving the objectives of the draft HENPS that are realistic and within its scope.

For the draft HENPS, the scope for alternatives considers the policy context established in 2018, which confirmed Heathrow as the preferred location for additional runway capacity in the South East. Through the ANPS review, the Government has undertaken new analysis and, where appropriate, considered the Airport Commission's evidence, and concluded that there is still a clear need for new airport capacity at Heathrow. As a result, the AoS focuses on alternative ways of delivering expansion at Heathrow, rather than alternative locations.

NTS4. Appraisal of Reasonable Alternatives

Two reasonable alternatives have been assessed through the AoS:

- a scheme promoted by Heathrow Airport Limited (HAL); and
- a scheme promoted by the Arora Group / Heathrow West Limited (HWL).

Both schemes would deliver a Northwest Runway and additional airport infrastructure, enabling a comparable level of future capacity.

All effects described in this summary are assessed by comparison with a 'no-expansion' scenario, in which Heathrow Airport continues to operate with two runways and does not increase capacity. This provides a consistent baseline for understanding the additional impacts of expansion, rather than changes that may occur over time in any case.

No detailed mitigation measures have been applied as part of the reasonable alternatives appraisal. This is intended to allow a clear comparison of the underlying sustainability implications of each alternative.

Comparison of alternatives

The AoS shows that both alternatives would result in **significant adverse effects**. The key difference between them lies in how these impacts are distributed.

The HAL scheme has a larger physical footprint and requires more extensive infrastructure, including major modifications to the surrounding road network. This leads to environmental impacts that are more widespread and affect a larger geographical area. These include greater overall habitat loss, more extensive construction activity and broader changes to landscape and water systems.

The Arora / HWL scheme is more compact and involves less overall land take. This reduces the spatial extent of impacts but results in development being located closer to existing communities. As a result, effects such as noise, air quality impacts and the loss of homes are more concentrated and more intense in certain locations.

Across most environmental topics, both schemes result in **significant adverse effects**. Differences between the two are therefore primarily about the scale and distribution of impacts, rather than whether significant effects occur.

Summary of performance

- Both schemes result in **significant adverse effects** for air quality, climate change, biodiversity, noise, landscape, water and other environmental topics;
- Both schemes deliver **significant beneficial effects** for the economy; and
- Both schemes result in **mixed effects** for communities, with **significant adverse effects at the local scale** and **significant beneficial effects at the wider geographical scale**.

The AoS therefore concludes that neither scheme clearly avoids significant adverse effects, and that the key consideration is the balance between more widespread environmental effects and more concentrated local impacts, along with the scale of economic impact.

NTS5. Which approach informs the draft HENPS?

Following a scheme assessment process over summer 2025 and comparative process in autumn 2025, the Government announced in November 2025 that the scheme promoted by HAL would inform the ANPS review due to its view that this scheme offered the most credible and deliverable option. Following assessment of the alternatives carried out in this AoS, and the conclusion that neither scheme avoids significant adverse effects, the Government has not changed its view that the HAL scheme should inform the ANPS review.

NTS6. Appraisal of the draft HENPS

The AoS assesses the likely effects of the draft HENPS by considering how the policy would operate in practice, informed by the HAL scheme.

As with the appraisal of reasonable alternatives, all effects described in this summary are assessed by comparison with a 'no-expansion' scenario, in which Heathrow Airport continues to operate with two runways and does not increase capacity.

Mitigation measures are considered within the appraisal of the draft HENPS.

Summary of effects

Environmental effects

The appraisal identifies **significant adverse environmental effects** associated with expansion:

- Air quality would be affected by increased emissions from aircraft, road traffic and construction, meaning higher levels of pollution from aircraft and traffic in areas that have historically experienced poor air quality;
- Climate change effects arise primarily from increased greenhouse gas emissions, particularly from aviation, which cannot be fully controlled at the project level;
- Biodiversity would be affected through habitat loss, disturbance and changes to river systems, resulting in permanent changes to some habitats and ecosystems. These effects are influenced by the sensitivity of the surrounding environment and the scale of development required;
- Noise levels would increase as a result of additional flights and construction activity, affecting nearby communities and areas along flight paths;
- Landscape and visual character would change due to the introduction of new infrastructure and loss of open land; and
- Water resources and flood risk would also be affected through river diversion, increased demand and changes in drainage patterns. Similar adverse effects are identified for soils, resources and waste, and the historic environment.

Across these topics, the AoS concludes that the draft HENPS would lead to **significant adverse effects** at a strategic level.

People and community effects

Expansion would have a mixture of **significant adverse and beneficial effects** on communities, particularly those closest to the airport:

- **Local significant adverse effects** would arise from the loss of homes and facilities, as well as changes in environmental conditions and long-term disruption; and

- **Wider significant beneficial effects** would arise from the generation of employment, economic activity and connectivity.

Overall, the AoS identifies **significant adverse effects** at the local scale and **significant beneficial effects** at a wider scale, resulting in **mixed effects** overall for communities.

Economic effects

The AoS identifies **significant beneficial effects** for the local economy during operation of the airport, reflecting increased airport capacity, improved connectivity and the generation of employment. During construction of the airport, these benefits are accompanied by **significant adverse effects** at the local level, including disruption to existing businesses and economic activity.

At the national level, economic effects are **uncertain**, as a proportion of activity may reflect changes in where economic activity takes place rather than wholly additional growth.

The findings at this strategic stage may differ from those of detailed economic modelling, and the overall scale of economic benefits is **uncertain** and depends on future assumptions.

Cumulative and in-combination effects

The AoS also considers cumulative and in-combination effects, which describe how impacts may build up or interact.

Cumulative effects arise where several developments or changes affect the same environmental receptor or issue over time. The AoS identifies that:

- **Adverse cumulative effects** may occur where repeated increases in impacts, such as traffic, noise or emissions, gradually increase overall pressure on communities or environmental systems. This is particularly important in areas around Heathrow that already experience environmental constraints; and
- **Beneficial cumulative effects** may arise where improvements build up over time, for example through ongoing investment in transport infrastructure, environmental management or economic development, leading to broader positive outcomes.

In-combination effects occur where the impacts of Heathrow expansion enabled by the draft HENPS interact with those of other plans, projects or programmes, potentially intensifying, reducing or otherwise altering overall outcomes. The AoS identifies that

- **Adverse in-combination effects** may occur where different types of impact act together, such as noise, air quality changes and traffic growth affecting the same community, or where environmental pressures combine to increase effects on habitats and water systems; and

- **Beneficial in-combination effects** may occur where impacts work together in a positive way, for example where improved transport connectivity, employment opportunities and environmental measures combine to enhance accessibility and economic outcomes.

Mitigation and uncertainty

The draft HENPS sets out a comprehensive framework of policy requirements intended to avoid, reduce and manage the potential impacts of expansion. These include measures that are expected to be applied at later stages through detailed design, environmental assessment and regulatory control.

This framework includes, for example:

- requirements to demonstrate no new breaches of legal obligations on air quality, or not making existing breaches materially worse, and support air quality mitigations;
- policies to limit noise impacts on affected communities, including controls on night flights and measures to reduce noise exposure;
- expectations for surface access strategies that promote public transport use and reduce reliance on private vehicles;
- requirements to apply the mitigation hierarchy to biodiversity, including avoiding impacts where possible, and delivering compensation and biodiversity net gain where necessary;
- measures to manage water resources, flood risk and drainage through design and operational controls; and
- requirements to minimise carbon emissions where possible and support wider climate change objectives.

Taken together, these measures demonstrate that the draft HENPS actively seeks to control and mitigate the impacts of expansion.

However, the AoS also recognises that mitigation has limitations. Some impacts, particularly those associated with the scale of aviation activity such as greenhouse gas emissions, noise and habitat loss, cannot be fully avoided.

In addition, many mitigation measures depend on factors outside the direct control of the airport or the policy itself, including technological change, behavioural change and the actions of other organisations.

There are also uncertainties associated with the assessment, including future patterns of aviation demand, the pace of decarbonisation and the effectiveness of mitigation measures. These uncertainties are particularly important for climate change and air quality.

As a result, even with mitigation in place, significant adverse effects are expected to remain.

Draft HENPS appraisal conclusion

The AoS concludes that the draft HENPS would enable the delivery of Heathrow expansion with significant sustainability implications.

The assessment identifies:

- **Significant adverse** environmental effects across most topics;
- **Significant beneficial** economic effects; and
- **Significant mixed effects** on communities, with **significant adverse local effects** and **significant wider benefits**.

NTS7. Next Steps

The draft HENPS and supporting documents, including this AoS are published for consultation. Responses from stakeholders and the public will be taken into account before the HENPS is finalised.

If the HENPS is designated, any proposal for expansion at Heathrow will be subject to further detailed assessment as part of the development consent process.

