Department for Transport

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

Scoping Report: Technical Annex

Department for Transport

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Part 1: Baseline review

1. Air quality baseline

The air quality chapter focuses on the core study area (see **Figure 2-2** in the **Scoping Report: Main Body**).

1.1. Current baseline

Air Quality Management Areas

1.1.1. Air Quality Management Areas (AQMAs) are declared by councils in areas which exceed national objectives for levels of particulates, nitrogen dioxide, sulphur dioxide, ozone, benzene, polycyclic aromatic hydrocarbons, butadiene, carbon monoxide, lead and/ or nitrogen oxides.

Hillingdon AQMA

1.1.2. As shown in **Figure 3-1** in the **Scoping Report: Main Body**, the majority of the core study area falls within an AQMA designation. The largest proportion of the core study area falls within the Hillingdon AQMA, which was declared in 2003 for exceedances to nitrogen dioxide (NO2) targets. The Air Quality Action Plan notes that there are 12 automatic monitoring stations and 44 diffusion tube monitoring locations for these pollutants found across the borough.

1.1.3. Nitrogen dioxide remains a key pollutant within Hillingdon (and the surrounding area), with concentrations in parts of the borough (particularly along major transport corridors) continuing to exceed legal limits defined in Schedule 2 of the Air Quality Standards Regulations 2010. Borough-wide monitoring and previous assessments consistently identify elevated NO2 levels driven predominantly by road traffic. Local policies aim to reduce concentrations as far as possible towards World Health Organisation (WHO) guideline levels.

Other AQMAs

1.1.4. In addition to the AQMA designated by the London Borough of Hillingdon, several neighbouring local authorities around Heathrow have also declared AQMAs in response to ongoing exceedances of national air quality objectives, particularly for nitrogen dioxide (NO2). As noted in their Air Quality Action Plan, the London Borough of Hounslow has adopted a whole-borough AQMA for annual mean NO2 concentrations, reflecting exceedances along key transport corridors such as the A4 and surrounding urban roads. Similarly, in their Air Quality Action Plan, Spelthorne Borough Council in Surrey has declared a borough-wide AQMA for NO2, recognising elevated concentrations influenced by road traffic and strategic routes connecting to the airport. Beyond these, Slough Borough Council's Air Quality Action Plan also notes the presence of multiple AQMAs focused on areas adjacent to the M4 motorway, the A4 London Road and the A355 Tuns Lane junction – all busy road corridors where NO2 levels have historically breached the 40 µg/m³ annual mean objective.

1.1.5. These adjacent AQMAs emphasise the transboundary nature of air quality issues around Heathrow and the importance of coordinated management approaches across multiple local authorities.

Sources of pollution

Road transport emissions

1.1.6. This includes emissions from strategic and local road networks surrounding Heathrow - particularly the M25, A40 and A312. Emissions arise from private vehicles, taxis, buses, light commercial vehicles, and significant volumes of heavy goods vehicles associated with freight, logistics, servicing and commercial activity linked to the airport. These corridors generate substantial nitrogen oxides (NOx) and particulate emissions from residential, commercial, freight and airport-related traffic. Increased development without appropriate mitigation is expected to add further pressure on local air quality.

Airport-related emissions (airside and landside)

1.1.7. Emissions arise from aircraft movements (take-off, landing, taxiing and auxiliary power use) as well as airside ground support equipment, service vehicles, freight vehicles and other operational activities. These contribute to NOx, particulate matter (PM10 and PM2.5) and ultrafine particle concentrations in surrounding areas. Rail corridors and depots serving the airport also produce non-exhaust particulate emissions from brake and track wear.

1.1.8. The Air Pollution Information System holds data on NOx, sulphur dioxide (SO2) and ammonia concentrations at a 1 km resolution between 2020 and 2022. Heightened concentrations of NOx and SO2 were observed at and in proximity to Heathrow airport than surrounding areas. Increased development without appropriate mitigation is expected to increased concentrations of these pollutants in the area.

Industrial and operational emissions

1.1.9. A range of industrial and operational activities within and adjacent to the core study area contributes to local air pollution. These include aircraft maintenance, fuel storage and handling, on-site energy generation plant, logistics and freight operations, hot water generation / boiler use, waste management, and other ancillary industrial uses. These activities can emit PM10, PM2.5, NOx, SO2 and volatile organic compounds (VOCs).

Construction and demolition emissions

1.1.10. Construction and demolition work associated with airport infrastructure, surrounding development and regeneration areas can generate dust and fine particulates during earthworks, materials handling and site preparation. Non-road mobile machinery (NRMM) is an additional source of NOx and particulate emissions. Multiple concurrent development sites can give rise to cumulative construction-related impacts. Controls are typically implemented through Construction Environmental Management Plans (CEMPs) and compliance with the London 'Control of Dust and Emissions during Construction and Demolition' SPG (2014).

Aggregates and mineral handling

1.1.11. The handling, processing and transport of aggregates (such as sand, gravel and crushed rock) generate coarse and fine particulate emissions, particularly during loading, crushing and screening activities. Dust management plans are applied at aggregate sites, including wheel washing, road cleaning and covering of materials to minimise off-site dust dispersion.

Domestic and other area sources

1.1.12. Domestic fuel combustion, smaller industrial processes, and miscellaneous urban sources contribute to local background levels of NO2 and particulate matter. These are addressed through local enforcement, retrofit programmes and efficiency measures.

Local authority position on air quality and Heathrow Airport

1.1.13. The London Borough of Hillingdon identifies Heathrow Airport as a major contributor to local air quality pressures and has consistently expressed concerns that airport activities (and any future expansion) could worsen pollutant exposure for local communities. The Council (along with several other neighbouring local authorities) has stated its opposition to Heathrow expansion on air quality grounds, emphasising the need to protect residents from elevated NO2 and particulate concentrations and highlighting the challenges of achieving compliance with statutory air quality limits in the vicinity of the airport.

Ultra Low Emission Zone

1.1.14. London's Ultra Low Emission Zone (ULEZ) was introduced in 2008 to reduce air pollution and improve air quality by discouraging the use of vehicles that do not meet stringent emission standards. The scheme applies across Greater London and operates through daily charges on non-compliant vehicles, targeting key pollutants such as NO2, PM10, and PM2.5. The ULEZ forms part of a wider package of measures aimed at accelerating the transition to cleaner vehicle technologies and reducing emissions from road transport, which remains a dominant source of air pollution in the capital.

1.1.15. The introduction and subsequent expansion of the ULEZ (alongside the UK Governments national zero emission vehicle mandate) have resulted in a reduction in the number of higher-emitting vehicles operating within London, contributing to lower concentrations of NO2 and particulate matter. Greater London Authority (GLA) data shows that compliance with ULEZ emissions standards across Greater London has reached around 95% of vehicles, representing a substantial shift in fleet composition toward cleaner vehicles since the expansion of the zone in August 2023. Estimates indicate that NOx emissions from cars and vans in outer London are 13% lower, with PM2.5 exhaust emissions around 20–31% lower than they would have been without the expansion of ULEZ. Roadside NO2 concentrations across the city have been recorded as much as 27% lower overall compared with scenarios without ULEZ, alongside marked improvements at the vast majority of monitoring sites across Greater London.

1.1.16. Baseline air quality in and around Heathrow Airport has improved compared with conditions described in the 2018 AoS scoping report. Concentrations of NO2 and PM2.5 have declined in recent years, with the most pronounced reductions following the introduction and expansion of the ULEZ. These improvements have continued even as traffic volumes have returned towards pre-pandemic levels, indicating that policy-driven changes in vehicle fleet composition (rather than broader temporal variations) are a key driver of the improved baseline.

1.1.17. Given Heathrow's location within Greater London and the large volume of airport-related surface access movements, ULEZ requirements are likely to continue influencing the emissions profile associated with passenger, staff and freight traffic. Ongoing shifts toward cleaner vehicles may help mitigate some air quality impacts along airport access routes, although any benefits will depend on overall traffic volumes, compliance rates and the scale of future airport activity.

1.2. Future baseline

1.2.1. In the absence of the draft Heathrow Expansion National Policy Statement (HENPS), Heathrow Airport would be expected to continue operating broadly within its existing capacity. Future changes in air quality in the short to medium term would therefore primarily reflect background trends, including general economic activity, technological change, committed transport infrastructure, and the effects of national, regional and local air quality policies.

1.2.2. Over time, background emissions are expected to reduce for some pollutants due to regulatory controls and improvements in vehicle and engine standards. However, construction activity associated with non-HENPS development, ongoing airport operations, freight movements and surface access traffic would continue to contribute to emissions of NOx, particulate matter (PM10 and PM2.5), ammonia (NH3) and other pollutants in the vicinity of the airport.

1.2.3. Planned and potential enhancements to rail and public transport connectivity serving Heathrow, including improved links to the wider London and regional transport network, are expected to influence future travel patterns. While increased rail activity may contribute to localised non-road transport emissions, enhanced public transport provision is anticipated to support modal shift away from private car use, thereby reducing road traffic emissions associated with airport access.

1.2.4. Continued uptake of electric and ultra-low-emission vehicles (for further information, see **Section 3.1**) is expected to contribute to reductions in emissions over the longer term. However, the rate and extent of uptake of such vehicles is uncertain and may be slower than previously anticipated, particularly for certain vehicle types and user groups. In the interim, a significant proportion of the vehicle fleet is likely to continue to comprise non-electric vehicles.

1.2.5. Emissions from non-electric vehicles may continue to include NH3, particularly from vehicles fitted with selective catalytic reduction or three-way catalytic converters. Ammonia emissions can contribute to the formation of secondary particulate matter and therefore remain relevant to future air quality considerations around the airport.

2. Biodiversity baseline

The biodiversity chapter focuses on the core and extended study areas (see **Figure 2-2** in the **Scoping Report: Main Body**).

2.1. Current baseline

Internationally important sites

2.1.1. Special Areas of Conservation (SAC), Special Protection Areas (SPAs), and Ramsar sites are designated biodiversity assets of international importance, which are protected under the Conservation of Habitats and Species Act (2010).

2.1.2. There are nine sites of international importance within 15 km of the core and extended study areas. These are:

- Burnham Beeches SAC, designated for its beech forest on acid soil habitat, which is integral for the survival of various mosses, insects, lichens, and other invertebrates;
- Richmond Park SAC, designated for its large number of ancient trees that support populations of stag beetle (*Lucanus cervus*) and other invertebrates associated with decaying timber;
- Chiltern Beechwoods SAC, designated for its beech woodlands within an important part of a grassland-scrub-woodland mosaic. The site also supports populations of Stag beetle (*Lucanus cervus)*;
- South West London Waterbodies SPA and Ramsar, designated for its wetland habitat that supports species of gadwall duck (*Anas streperal*) and northern shoveler ducks (*Anas clypeata*);
- Thames Basin Heaths SPA, designated for its habitats that support breeding populations of a number of bird species including nightjar (*Caprimulgus europaeus*) and woodlark (*Lullua arborea*);
- Thursley, Ash, Pirbright and Chobham SAC, designated for its northern Atlantic wet heaths, European dry heath, and Depressions on peat substrates of the *Rhynchosporion* habitats;
- Wimbledon Common SAC, designated for its dry and wetland heath habitats, supporting populations of stag beetles (*Lucanus cervus*); and

- Windsor Forest and Great Park SAC, designated for its old acidophilous oak woods and beech forest habitats that support the largest number of veteran oaks (*Quercus spp*.) in Britain (and possibly Europe). It also supports significant populations of the violet click beetle (*Limoniscus violaceus)* and is considered to be the most important site in the UK for fauna associated with decaying timber on ancient trees.

2.1.3. It is worth noting that the 2018 Habitats Regulations Assessment surmised that air quality change had the potential to cause likely significant effects on all of the international sites mentioned above. South West London Waterbodies SPA and Ramsar was concluded as facing likely significant effects from the greatest number of potential impacts including direct habitat loss, noise and disturbance, hydrological change, air quality change and operation/management and mitigation (mortality).

2.1.4. A search radius of 30 km was used for statutory international designated sites that may contain bats in line with best practice guidelines. There is one internationally designated site identified within 30 km of the core and extended study areas that list bats as the species of qualifying interest: Mole Gap to Reigate Escarpment SAC, located approximately 20 km south-east of the core study area.

Nationally important sites

2.1.5. Sites of Special Scientific Interest (SSSIs) are nationally designated areas that protect the UK's most important wildlife, habitats, and geological features. National Nature Reserves (NNRs) are a selection of the most significant SSSIs, established to conserve key habitats, species, and geology, and to support scientific research, education, and public understanding of the natural environment. SSSIs and NNRs are designated under the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act 2000. In total, there are 25 SSSIs and two NNRs within 5 km of the core and extended study areas.

2.1.6. The protection, preservation and conservation of the area's designated sites is a key priority. Natural England conducts surveys on the condition of every SSSI in the country. For the SSSIs in proximity to Heathrow, the latest data survey shows that the majority of the SSSI units within the sites are in 'favourable condition' (75%) or 'unfavourable – recovering' condition (13%). A low proportion of the SSSI units are in 'unfavourable -no change' (5%) or 'unfavourable – declining' (7%) condition.

2.1.7. SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset that map zones around each SSSI according to their sensitivities. They specify the types of development that have the potential to have adverse impacts at a given location, and thresholds of development which indicate a need to consult Natural England. In this respect, there are areas of the Heathrow Airport expansion site that overlap with IRZs for development types expected to be brought forward by the draft HENPS; therefore, consultation with Natural England will be required for any applications that come forward.

Locally important sites

2.1.8. Local Nature Reserves (LNRs) are designated under the National Parks and Access to the Countryside Act 1949, as amended by the Natural Environment and Rural Communities Act 2006. They are designated to conserve locally significant natural habitats, species, and geological features. They provide accessible green spaces for community enjoyment, education, and engagement, while also serving as valuable sites for local ecological research and conservation efforts. There are five LNRs within the core and extended study areas (Cranebank; Frays Valley; Denham Quarry Park; Stockers Lake; and Rickmansworth Aquadrome. There are an additional 34 LNRs within 5 km of the core and extended study area.

2.1.9. Sites of Importance for Nature Conservation (SINCs) are another local designation for nature conservation. Designating a SINC raises awareness of its importance for wildlife particularly with regard to planning and land management decision making. Several SINCs lie within or adjacent to the core and extended study areas, including (but not limited to): Lower Colne; Fields Close Open Space rough; Wall Garden Farm Sand Heaps; Cranford Lane Gravel Workings; Cranford Countryside Park and Open Space; Crane Corridor; Stockley Road Rough; Carp Ponds and Broad Dock; London's Canals; Mid Colne Valley; and Springwell and Stocker's Lakes. There also are many other SINCs in proximity to the study areas.

2.1.10. The airport sits between two ecologically important river systems; the River Colne and the River Crane. Heathrow Airport manages 13 biodiversity sites that cover approximately 170 ha that sit between these river systems. These sites contain a range of flora and fauna and contribute towards local green spaces, with several sites fully or partially open to the public.

Pressures on Conservation Sites

2.1.11. Pressures on the areas designated as being of nature conservation value include those arising from human activity (such as recreation, development and various forms of pollution including noise and light), and from climate change. Air pollution, including NOx, NH3 and associated nitrogen deposition, can also adversely affect sensitive habitats by altering soil chemistry, reducing plant species diversity and affecting ecological processes. Altogether, these pressures can result in, for example, habitat loss and fragmentation, a decline in species health, disturbance to wildlife, introduction of non-native species, and increased flood risk.

2.1.12. In December 2024, the Heathrow Nature Positive Plan (HNPP) was published. The HNPP sets out the strategy using a suite of measures to reduce negative impacts and restore nature through three focus areas: at the airport, around the airport, and UK / Global.

Habitats and Species

2.1.13. There are large areas within the core and extended study areas covered by a Biodiversity Action Plan (BAP) Priority Habitat designation. Deciduous woodland and lowland meadows are among the most commonly found BAP habitats in the area, as well as floodplain grazing marsh.

2.1.14. In line with national planning guidance on irreplaceable habitats, the study area contains habitats that are regarded as irreplaceable due to their age, uniqueness, species diversity, or rarity. This includes one site of ancient woodland that falls within the core study area: Cranford Park. There also several other sites of ancient woodland within 5 km of the study areas. In addition, the wider landscape is likely to contain ancient and veteran trees, particularly within parkland, riparian corridors and historic landscapes, which represent important biodiversity assets due to their ecological continuity, specialist species assemblages and role in supporting habitat connectivity.

2.1.15. A combination of desk and field studies in 2017 on accessible land parcels surrounding Heathrow Airport found no plant species listed on Schedule 8 of the Wildlife and Countryside Act 1981 (as amended), or those listed on Schedule 5 of the Conservation of Habitats and Species Regulations 2017. However, one nationally scarce species, annual beard grass (*Polypogon monspeliensis*), was identified. As of 2022 the species is not listed as a species of principal importance in England.

2.1.16. An additional four species; marsh pennywort (*Hydrocotyle vulgaris*), field pepperweed (*Lepidium campestre*), hoary plantain (*Plantago media*) and shepherd's cress (*Teesdalia nudicaulis*) were listed as near threatened on the Vascular Plan Red List for England. However, they are not listed as a species of principal importance in England.

2.1.17. There were also 33 species of invasive non-native plant species identified, including several species that are listed in Schedule 9 of the Wildlife and Countryside Act 1981 such as Japanese knotweed (*Fallopia japonica*), Himalayan balsam (*Impatiens glandulifera*), rhododendron (*Rhododendron ponticum*), cotoneaster (*Cotoneaster* spp.) and floating pennywort (*Hydrocotyle ranunculoides*). These species represent a threat to natural fauna and flora within Great Britain.

2.1.18. With regard to fauna, desk study records and field surveys undertaken in 2017 indicated the presence of a wide range of aquatic and riparian species of principal importance in England in proximity to Heathrow Airport, including European eel (*Anguilla anguilla*), white-clawed crayfish (*Austropotamobius pallipes*), water vole (*Arvicola amphibius*) and otter (*Lutra lutra*). Several bat species of principal importance, including noctule bat (*Nyctalus noctula*) and soprano pipistrelle (*Pipistrellus pygmaeus*), were also recorded within the core study area, with roosts identified in buildings, structures and trees. Slow worm (*Anguis fragilis*) and grass snake (*Natrix helvetica*), both listed as Section 41 species, were recorded during field surveys. Given the age of these data, current species distribution and abundance may differ and updated survey information would be required at subsequent stages.

2.1.19. Heathrow Airport maintains 13 local biodiversity sites that help to support a range of species and habitats. The habitats managed at these sites include wetlands, hedgerow, grasslands and meadows. The wide range of habitats provide suitable locations for several species of fauna and flora to thrive including stag beetles, black popular, water avens, and nathusius's pipistrelle.

2.1.20. Many locations within and surrounding the core and extended study area provide suitable habitats for a range of common bird species alongside the bird species protected at internationally important sites. As such, Heathrow has a higher percentage of bird species in its immediate range than other UK airports. Any development that disrupts the behaviour of these birds or places a greater number of aircraft in closer proximity to them will increase the rate of bird strikes.

National Habitat Network

2.1.21. The National Habitat Network (NHN) is a set of maps that work to help identify areas for future habitat creation and restoration at a landscape scale.

2.1.22. According to the NHN, there are areas of Network Enhancement Zone 1 and 2 (most suitable for new habitats and green infrastructure) and Network Expansion Zone found throughout and in proximity to the core and extended study areas indicating a high degree of potential to improve or expand the area's existing habitats. To the south of the core study area there are also two large restorable habitat sites.

Multi-functional green infrastructure

2.1.23. Multi-functional green infrastructure refers to a network of green and blue spaces which is capable of delivering a wide range of benefits, including improving health and wellbeing, managing health and social care costs, reducing health inequalities, habitat creation, restoration and connectivity, improving social cohesion and addressing climate change.

2.1.24. Given its cross-cutting nature, multifunctional green infrastructure plays an important role in integrating biodiversity objectives with wider environmental and social outcomes. These interrelated benefits will be considered in more detail in other AoS topic chapters below.

Local nature recovery strategies

2.1.25. Local Nature Recovery Strategies (LNRS), introduced under the Environment Act 2021, set out priorities and opportunities for nature recovery and map where actions should take place to restore habitats and improve the wider environment. The core and extended study area overlap with several LNRSs, including Berkshire, Buckinghamshire and Milton Keynes, Hertfordshire, London and Surrey.

2.1.26. Habitat fragmentation by infrastructure development is highlighted as a concern by all of the relevant LNRSs. Notably, the Berkshire LNRS identifies the proposed Heathrow expansion as the greatest threat to wildlife and wider ecological connectivity between the Thames and the Chilterns.

2.1.27. The proposed expansion would require culverting of several rivers to the west of the core expansion area. These watercourses contribute towards a wider network of reservoirs and gravel pits that serve as critical habitats for waterbirds. As such, the expansion has the potential to impeded targets set out in the relevant LNRSs relating to these habitats. All of the LNRSs that overlap with the core and extended area of the proposed expansion site have identified priority locations where actions to restore and enhance biodiversity could have the greatest impact. The proposed expansion site overlaps with several of these areas. Damage to these areas associated with the draft HENPS may impact the ability of the relevant LNRS to deliver habitat restoration and enhancement, and to contribute effectively to wider environmental targets.

2.2. Future baseline

2.2.1. The future baseline will be shaped by Heathrow development and climate change. Development could alter land use and increase pollution, while climate change can alter habitats and ecosystems, cause shifts in suitable climate conditions, lead to changes in community composition of animals and plants and lead to more extreme weather events that can disrupt wildlife. In combination, these factors can lead to the degradation of biodiversity assets, necessitating comprehensive management and mitigation plans.

2.2.2. Although statutory international and nationally designated sites benefit from strong legal protection, this does not guarantee an absence of deterioration in their condition into the future. Many of these sites are already subject to existing pressures, including air quality exceedances, hydrological change, climate-driven ecological shifts, recreational disturbance, invasive species and the ongoing urban and airport-related influences present in the area.

2.2.3. Future development would still be required to deliver biodiversity net gain (BNG), which may help enhance certain habitats and ecological networks; however, BNG measures would not necessarily prevent or offset wider environmental pressures on designated sites, and any benefits are likely to be variable across the study area. It is noted that currently, the relevant provisions to secure BNG are not yet in force; however, they are set to begin on 2 November 2026.

2.2.4. The Colne Valley Western Slopes is an ongoing project that will deliver extensive new habitats within the vicinity of Heathrow Airport. The establishment of new habitats may attract increased numbers of bird species to the surrounding area. As these habitats become more established overtime, the future baseline could be characterised by

increased levels of bird activity, which could increase the potential for bird strikes.

2.2.5. The proposed expansion at Heathrow presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species, and designated sites at an early stage of planning for future growth. Alongside this, opportunities to avoid, reduce, and mitigate potential impacts on biodiversity should be identified and embedded within the design process from the outset, following the mitigation hierarchy.

2.2.6. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats, but also the connections between them. It will be important to effectively coordinate the delivery of new development to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within and in proximity to Heathrow Airport.

3. Climate change baseline

The climate change chapter focuses on the core and (where appropriate) extended study areas (see **Figure 2-2** in the **Scoping Report: Main Body**).

3.1. Current baseline

Climate emergency

3.1.1. The UK Government formally recognised a climate emergency in 2019 and has committed to achieving net zero greenhouse gas emissions by 2050, as set out in the Climate Change Act 2008 (as amended). This commitment is supported by a series of carbon budgets and national strategies aimed at reducing emissions, increasing renewable energy generation, improving energy efficiency and enhancing climate resilience.

3.1.2. The core study area lies across the administrative boundaries of the London Borough of Hillingdon, the London Borough of Hounslow, Spelthorne Borough Council, Buckinghamshire Council; and Slough Borough Council. Between 2019 and 2020, Hillingdon, Hounslow, Spelthorne, and Buckinghamshire declared climate emergencies for their authority areas. Similarly, in July 2019 Slough Borough Council declared a political motion on climate change to address its causes and consequences.

Contribution to climate change

3.1.3. The UK is a relatively small contributor to global climate change, accounting for approximately 1% of total global greenhouse gas (GHG) emissions on a territorial basis in 2024. According to the Government's UK Greenhouse Gas Emissions estimates for 2025, UK net territorial emissions were provisionally estimated at 367 million tonnes of carbon dioxide equivalent (MtCO2), which represents a decrease of 2% from 2024 and 54% since 1990. The domestic transport sector remains the largest emitting sector nationally, responsible for 31% of GHG emissions. When international aviation and shipping are included (as required under the UK's Sixth Carbon Budget and subsequent budget accounting) the transport sector's overall share increases, reflecting the significant contribution of international aviation to national emissions totals. Across all sectors, carbon dioxide remains the primary GHG, accounting for 78% of total emissions.

3.1.4. According to the UK Civil Aviation Authority's UK Aviation Environmental Review 2025 (CAP3198), civil aviation flights departing from UK airports generated 36.2MtCO2e. This is 3% lower than the 2019 peak (which serves as a benchmark that should not be exceeded in order to meet net zero by 2050). However, in 2024 air traffic movements were 9% below 2019 levels – this demonstrates that emissions linked to aviation have increased faster than air traffic, linked to larger aircrafts being used by airlines to respond to passenger demand.

3.1.5. In September 2025, Gatwick Airport was granted consent to bring their northern runway into routine use, although as of June 2025 this consent is currently subject to an ongoing legal challenge and may therefore be subject to change. Luton Airport is similarly progressing expansion plans intended to increase passenger capacity and associated flight activity. Together, these projects are expected to add significant capacity to the number of flights operating at both airports and will increase their respective contributions to GHG emissions from aviation activity, resulting in a higher national total for GHG emissions from airports.

3.1.6. Heathrow Airport lies across two English regions: London and the South East. Data published by the Department for Energy Security and Net Zero indicate that, in 2023, total territorial greenhouse gas emissions were 27,252 kilotons of carbon dioxide equivalent (ktCO2e) in London and 38,930 ktCO2e in the South East of England. In London, the domestic sector is the largest contributor to regional emissions, whereas in the South East the transport sector accounts for the highest proportion of emissions. Emissions in both regions have shown a steady reduction since 2005.

3.1.7. Heathrow Airport publishes a sustainability report annually in which GHG emissions associated with Airport activities are presented. Emissions from Heathrow Airport are categorised into 3 'Scopes'. Scope 1 includes all GHG emissions from activities at Heathrow Airport under their direct control (buildings, vehicles that are owned by Heathrow Airport, fuel required to heat terminals). Scope 2 includes all indirect GHG emissions from the electricity purchased for the organisation's owned and operated activities. Finally, Scope 3 includes all other indirect GHG emissions from activities in relation to Heathrow Airport, occurring from sources that the organisation does not directly control. The contribution of each 'Scope' to GHG emissions is show in **Table 3-1**.

Table 3-1: Heathrow GHG emissions 2022-2024 (tonnes CO2 equivalent)

Scope	2022	2023	2024
Scope 1	29,806	32,116	28,054
Scope 2	52,717	56,134	56,339
Scope 3	1,632,346	2,061,672	2,155,029
Total	**1,714,869**	**2,149,922**	**2,239,422**

3.1.8. Current and past GHG emissions at Heathrow Airport are primarily from Scope 3 emissions, which account for the majority of the total carbon footprint across the last three years. The emissions from this sector are largely associated with aircraft operations. Total emissions from Heathrow Airport have been increasing since 2022 as aviation demand returns following the Covid-19 pandemic. However, total GHG emissions still remain lower than 2019 levels.

3.1.9. It should be noted that **Table 3-1** omits CO2 emissions from the cruise elements of departing flights. The latest figures from Heathrow Airport show that emissions from the cruise elements of flights was 17.2 million tonnes in 2024.

3.1.10. The proposed third runway would enable at least 276,000 additional flights each year. This would be expected to result in a net increase in GHG emissions, driven primarily by emissions associated with the cruise phase of international flights, in which the majority of GHG emissions associated with the aviation sector occur.

3.1.11. The Urban Heat Island effect is a phenomenon whereby urban areas experience significantly warmer temperatures than surrounding rural areas due to lack of vegetation, dense infrastructure and human activities. Heathrow Airport comprises of large areas of hardstanding and built infrastructure which contribute to localised heating relative to surrounding rural areas. This increase in temperature can increase energy demand and have an effect on local environmental conditions.

3.1.12. The National Networks National Policy Statement stipulates that applications for new national infrastructure fully consider the direct and indirect impacts of climate change. Applications are expected to use the latest UK Climate Projections and associated research at the time of preparing their environmental assessment as part of the Development Consent Order application, to ensure they have identified mitigation or adaptation measures. Proposals should also demonstrate flexibility to adapt to maximum climate change scenarios in the future.

Renewable energy

3.1.13. In terms of renewable energy, Heathrow Airport operates a biomass boiler supplying lower-carbon heat to Terminals 2 and 5 and is investing in on-site solar installations to increase renewable electricity generation. All additional electricity required for Heathrow owned operations is sourced from the grid from 100% renewable sources. However, heating and hot water provision across much of the airport remain predominantly reliant on natural gas. To address this, Heathrow finalised an energy strategy in 2024, identifying large-scale heat pumps as the driving force behind the transition to renewable heat energy between 2027 and 2031.

3.1.14. Electric Vehicles (EVs) are battery powered and do not burn fuel; therefore, they have the potential to be 'zero-emission vehicles' (ZEVs) if powered by renewable electricity. As part of the wider national shift toward cleaner road transport (supported by the Government's ZEV mandate, which is expected to accelerate the uptake of electric cars and vans) EV use at airports is also increasing. At the end of 2024, Heathrow Airport had around 7,000 vehicles operating airside, with around 23% of them being EVs. The organisation is also working with airline partners to decarbonise their transition to electric vehicles; according to their sustainability report, during 2024 Virgin Atlantic introduced 63 new electric vehicles to support its operations at Heathrow Airport and 90% of British Airways ground vehicles are now zero emissions when being used or driven.

3.1.15. The Airport is also increasing its provision of charging stations to support the switch to electric vehicles. In 2024, 12 ultra-rapid charging bays were installed at Terminal 2 that enables up to 600 cars to charge per day. In addition to this, six 120kW charging bays installed in 2023 are now fully operational at Terminal 3.

3.1.16. Hydrogen-powered aircraft offer the potential for zero carbon emissions and represent opportunities to decarbonise aviation. However, zero-emissions commercial flights are not currently in operation at Heathrow or elsewhere globally, and the infrastructure required to support hydrogen or fully electric aircraft is not yet widespread. To reduce emissions in the interim there has been an increase in the uptake of sustainable aviation fuel (SAF), with Heathrow's sustainability report noting that airlines operating 78% of flights at Heathrow committed to using at least 10% SAF by 2030. The report also notes that Heathrow is also supporting research and collaboration on zero-emissions flight technologies.

Flood risk

Tidal, fluvial and surface water flooding

3.1.17. The core and extended study areas lie within the London, Colne, and Maidenhead and Sunbury management catchments. The majority of the study areas falls within the Colne catchment, a low-lying fluvial system characterised by extensive floodplain areas. The catchment includes several notable rivers that run through the study area, these are: Colne Brook, Wraysbury River, Longford River, Duke of Northumberland's River and the River Colne. As such, flood risk in the area is influenced by fluvial flooding. As shown in **Figure 5-1** of the **Scoping Report: Main Body**, areas of Flood Zone 2 and 3 are located within and surrounding the study area. Areas of Flood Zone 3 are predominantly confined to land adjacent to existing watercourses. Flood Zone 2 extends beyond these watercourses into the wider area. Fluvial and tidal flooding is absent from the existing airport infrastructure.

3.1.18. The closest tidal waterbodies to the site are the River Crane at Isleworth and the River Thames, located over 4 km east of the core study area. As such, it is considered unlikely that development of the site within the core study area would impact tidal flood risk. However, areas of the extended study area overlap with sections of the River Crane at Isleworth and sit within areas of Flood Zone 2 and 3. It is likely that the type of development expected to come forward within the extended study area has the potential to increase the risk and severity of tidal flooding in the area.

3.1.19. Data from the Met Office Climate Data Portal suggests that sea-level rise is expected to reach approximately half a metre in the Thames Estuary under an RCP 4.5 (intermediate) scenario by the end of the century compared to a 1981 – 2000 baseline. This projected increase in sea levels will contribute to higher high tides, exacerbating existing flood risk in areas prone to tidal flooding.

3.1.20. Surface water flooding is also present across the core and extended study areas, reflecting the flat topography within the Colne Valley. As shown in **Figure 5-2** of the **Scoping Report: Main Body**, areas of low to high surface water flood risk are distributed across the study area. Despite this, the Regional Flood Risk Appraisal produced by the Greater London Authority concluded that surface water flood risks to Heathrow are minor.

3.1.21. Managing increases in the built footprint of the Airport to prevent exacerbating surface water flood risks is addressed in the 2014 Sustainable Drainage Assessment produced by Amec for Heathrow. Future development will also need to accord with the National Standards for Sustainable Drainage Systems (SuDS), which are intended for the management of uncontaminated surface water.

3.1.22. Given the nature of airport operations, some activities may generate contaminated surface water. In such cases, it may be necessary for proprietary treatment systems or alternative drainage measures to be used instead of, or in addition to, SuDS. Pollution prevention guidance and environmental permitting requirements will therefore be relevant where activities could result in contaminated runoff, with detailed design, pollution control measures and permitting to be addressed at subsequent project and consenting stages. Any such measures would also need to be considered in the context of flood risk management and impacts on receiving watercourses.

3.1.23. It is worth noting that the River Colne passes directly through the core study area. As such, future proposals may require diversion, realignment, or other modification of sections of the river. Any modification to the River Colne would have the potential to affect flood risk, flow conveyance, floodplain connectivity and ecological status, and would therefore need to be robustly assessed.

3.1.24. Modifications to watercourses would be required to comply with relevant flood risk legislation and policy, as well as the objectives of the Water Framework Directive, including the requirement to avoid deterioration of water body status. Culverting or enclosure of watercourses should be avoided unless all reasonable alternatives have been ruled out and there are compelling reasons. Such works would also be subject to permitting and consent requirements from the relevant Risk Management Authorities, with detailed assessment and consenting addressed at subsequent stages of project development.

Flood risk from reservoirs

3.1.25. Planned development will also need to consider the risk of flooding from reservoirs, as well as the potential effects of development on reservoir safety and operation. The core and extended study areas in proximity of several large reservoirs and therefore fall within areas that could be affected in the unlikely event of reservoir failure or emergency draw-down.

3.1.26. Future airport-related development may influence reservoir flood risk through changes to land use, surface water runoff, floodplain connectivity or emergency access. Additionally, development located near or affecting reservoirs or associated infrastructure could have implications for reservoir owners, including potential additional regulatory requirements or operational constraints.

3.1.27. Where new reservoirs or flood storage features are proposed as part of development, consideration will need to be given to risks both from and to reservoirs, including the potential consequences of dam failure, emergency draw-down and downstream flooding. Measures such as floodplain compensation or flood storage may fall within the scope of the Reservoirs Act 1975 and would require appropriate assessment, design and regulatory consent at subsequent stages.

Groundwater flooding

3.1.28. Given the geological nature of the site, groundwater levels are close to the surface. As a result, there is a risk of rising groundwater levels leading to groundwater flooding. The Heathrow Assessment of Flood Risk notes that groundwater movement within the area generally flows from the north-east towards the south-west, although extensive mineral extraction, landfilling and development have altered natural groundwater pathways, creating areas where groundwater is elevated further which can result in increased frequency and severity of groundwater flooding.

3.1.29. The Heathrow Assessment of Flood Risk also surmised that there was no existing flood risk from tidal or sewer flooding at the Airport's existing site. However, the assessment identified flood risk associated with the presence of several large reservoirs located to the south-west of the core study area. In the event of a failure of the embankments of these reservoirs, flooding could occur. However, Heathrow airport lies upslope of the reservoirs and so the risk to Heathrow is considered to be low.

Evidence from strategic flood risk assessments

3.1.30. The core and extended study areas extend across several local authority areas, including: London Borough of Hillingdon; London Borough of Hounslow; London Borough of Richmond upon Thames; London Borough of Ealing; Buckinghamshire; Spelthorne Borough; Three Rivers District; and Slough Borough.

3.1.31. Slough Borough's draft Strategic Flood Risk Assessment (dSFRA) identifies areas in Slough at risk from all sources of flooding. The dSFRA identifies the whole area of Colnbrook, directly west of Heathrow, to be prone to fluvial, groundwater and surface water flooding.

3.1.32. The Hillingdon Surface Water Management Plan highlights that areas along the western borough boundary and the south of the boundary around Heathrow Airport have the greatest potential for groundwater flooding in the borough.

3.1.33. Spelthorne Borough Council's SFRA highlights fluvial flooding from the River Thames and other watercourses as one of the main flood risks in the area. However, the northern region of the borough is unaffected by flooding from the Thames. The report also highlights widespread surface water and groundwater flooding throughout Spelthorne.

3.1.34. The West London Level 1 SFRA was commissioned jointly by the London boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon and Hounslow to provide an evidence base on flood risk across these boroughs. Regionally, flood risk relevant to Heathrow is primarily a result of main rivers including the River Colne to the west and the River Crane to the east.

3.1.35. In addition to fluvial flooding the SFRA identifies surface water flooding as a significant risk across built-up areas. In conformity with the Heathrow assessment of flood risk, groundwater flooding is also prominent throughout the region given that the majority of these boroughs are also underlain by London Clay and alluvial gravels.

Flood risk as an integrated issue

3.1.36. Flood risk in the Heathrow area is managed through an integrated approach that considers fluvial, surface water, groundwater and reservoir flood risk in combination, recognising the strong interactions between these sources. Potential changes to land use, drainage, watercourses and floodplain connectivity may influence multiple flood pathways simultaneously. The AoS will therefore assess flood risk effects in a holistic manner, having regard to cumulative and cross-boundary impacts, alignment with River Basin Management Plans and Strategic Flood Risk Assessments, and the role of green and blue infrastructure in mitigating risk. Detailed mitigation, design and consenting will be addressed at subsequent project stages.

3.2. Future baseline

3.2.1. The UK Aviation Forecasts (2017) project that, under a central demand forecast with no new runways, annual CO2 emissions from airports are expected to rise from 36.2 MtCO2 to 37.0 MtCO2 in 2050. It is expected that the delivery of a new runway at Heathrow could result in an additional 3.7 MtCO2 under a central estimate. This analysis is being updated as part of the Airports National Policy Statement (ANPS) review, and the updated analysis will be used to inform the main AoS report and published alongside any amended draft HENPS in summer 2026.

3.2.2. Under the Climate Change Act 2008 (as amended), the UK is legally bound to reduce GHG emissions through a series of five-year carbon budgets. While domestic aviation emissions are included within the UK's carbon budgets, international aviation emissions have historically been excluded. However, the UK Government has committed to include the UK's share of international aviation within the Sixth Carbon Budget (2033-2037) and in all future carbon budgets.

3.2.3. With regard to ground emissions, the uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of on the ground related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' Report (2018) and Heathrow Airport's commitment to lowering emissions from airport vehicles, it is assumed that ULEV uptake will increase rapidly in the coming decade and many more vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.

3.2.4. Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and level of confidence in each prediction.

3.2.5. As highlighted by the Met Office's climate change projections, the effects of climate change for London between 2040-2059 compared to 1981-2000 in a 'medium emissions' (RCP4.5) scenario are likely to be as follows:

- An increase in winter and summer mean temperature of between 1°C and 2°C; and
- A change in winter mean precipitation up to +10% and summer mean precipitation up to -20%.

3.2.6. Resulting from these changes, a range of risks exist for the region, including:

- Effects on water resources, such as a reduction in availability of groundwater for extraction and a need to increase capacity of wastewater treatment plants and sewers;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding and a need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution;
- Health impacts, including increased risk of respiratory and cardiovascular illnesses during heatwaves, higher vulnerability among elderly and low-income populations, and mental health impacts associated with extreme weather events;
- Effects on the significance of designated and non-designated heritage assets;
- Increased demand for air-conditioning; and
- Heat stress related issues with infrastructure due to increased temperature.

4. Communities and quality of life baseline

The communities and quality of life chapter focuses on the core study area (see **Figure 2-2** in the **Scoping Report: Main Body**).

4.1. Current baseline

4.1.1. It is worth also noting that an Equality Impact Assessment (EqIA) and a Health Impact Analysis (HIAn) are also being undertaken alongside the AoS. These assessments will examine distributional, equalities-related and health-specific effects in greater depth, complementing the strategic focus of the AoS and ensuring that key population groups and health outcomes are considered through a proportionate and coordinated assessment framework.

Population and community characteristics

Population growth and demographics

4.1.2. General trends indicate a growing local population in the Heathrow area. For example, ONS data suggests that the population of the London Borough of Hillingdon increased by 11.7% between 2011 and 2021 (from 273,900 to 305,900). This was higher than the population growth rates for both London (7.7%) and England (6.6%) over the same period. Similar trends are experienced in other neighbouring authorities.

4.1.3. Population growth in the local area will increase demand for housing, community facilities, health services, and access to green space in the area surrounding Heathrow.

Community identity and local cohesion

4.1.4. Several long-established settlements lie within or adjacent to the core study area including Harmondsworth, Longford and Sipson. These communities have strong local identity, heritage assets, and established social networks. Any loss or fragmentation of these communities would represent a significant impact on community cohesion and continuity.

Local housing and potential displacement

Housing stock and residential areas

4.1.5. The Heathrow expansion would likely require the demolition of a significant number of dwellings, including the significant losses in the villages of Harmondsworth and Longford, and potentially parts of Sipson. This represents a substantial displacement impact on residents and established neighbourhoods.

Local housing need

4.1.6. Across the authorities surrounding Heathrow (including London boroughs such as Hillingdon and Hounslow, as well as neighbouring areas such as Slough and Spelthorne) housing need is consistently high and local capacity to meet that need is constrained. For example, the London Plan (2021) identifies a requirement for substantial new housing delivery across London, with individual borough targets based on limited land availability rather than underlying demand. Similar pressures apply in adjacent non-London authorities, where population growth and constrained land supply drive continued demand for new homes.

4.1.7. In this context, the loss of existing housing due to Heathrow expansion would occur in an area where additional housing is already required, rather than removed, increasing potential community sensitivity to displacement and land-use change.

Community facilities, amenities and local services

Potential loss of facilities and services

4.1.8. The core study area footprint contains numerous community, employment and service assets that would potentially be affected or permanently lost, including:

- Employment land and local businesses;
- Waste management facilities (e.g. Biffa, Grundon);
- Schools (including in Harmondsworth and Sipson);
- Heritage assets and listed buildings (see **Chapter 7**); and
- Local recreational routes and green infrastructure.

Access to services and potential severance

4.1.9. Heathrow Airport and associated transport infrastructure already create physical and perceptual severance between communities. Further expansion may alter:

- Access to schools;
- Journey times to healthcare;
- Connectivity between neighbouring communities;
- Pedestrian and cycling routes; and
- Access to town centres and local facilities.

Potential benefits

4.1.10. In addition to the potential constraints identified within this theme, airport expansion could also generate a number of benefits for local communities and the wider region. These may include increased employment opportunities during both construction and operation, with potential knock-on effects for skills development and household income (see **Chapter 6** for more detail). Expansion may also support improved connectivity by providing greater choice and availability of international travel, which can enhance business links, family connections and access to global destinations.

Social groups and vulnerable users

4.1.11. Although detailed equalities and health distributional impacts will be assessed through the EqIA and HIAn, the AoS recognises that certain groups (such as children, older people, low-income households, minority ethnic groups, and residents experiencing multiple deprivation) may be more sensitive to the effects of airport expansion. These groups may face disproportionate impacts from displacement, severance, changes in access to services, and environmental pressures. Identifying these sensitivities at a strategic level ensures the assessment remains inclusive and responsive to differential community needs.

Health & wellbeing

General health indicators

4.1.12. Using Hillingdon as an illustrative example, Census 2021 data indicates the following:

- 47.4% of residents described their health as ‘very good’ (up from 43.8% in 2011);
- 35.2% described their health as ‘good’;
- 3.6% described their health as ‘bad’ (down from 4.3% in 2011); and
- 1.1% described their health as ‘very bad’.

4.1.13. These figures indicate generally improving health across the local population closest to the Heathrow expansion site, yet they also highlight that a notable minority continues to experience poorer health outcomes. These patterns shape how different population groups may experience environmental change, particularly where baseline health is already below average or where cumulative environmental pressures are present.

Existing environmental stressors

4.1.14. Communities around Heathrow are subject to a number of long-standing environmental factors that influence overall wellbeing. These include consistent exposure to aviation noise, road traffic noise, poorer air quality in certain hotspots, high levels of local congestion, and relatively limited access to quiet or open recreational areas.

4.1.15. These existing conditions form part of the wider context in which further changes associated with airport expansion would be experienced. Communities already exposed to multiple environmental pressures, or those with less favourable health outcomes, may have different levels of sensitivity to additional change than communities with fewer such constraints.

Green infrastructure and open spaces

4.1.16. Improving access to greenspace is increasingly being recognised as an important asset for supporting health and wellbeing. This 'natural capital' can help local authorities address local issues that they face, including improving health and wellbeing, managing health and social care costs, reducing health inequalities, improving social cohesion and taking positive action to address climate change.

4.1.17. The Heathrow expansion development has the potential to result in the permanent loss of several green spaces, including:

- Harmondsworth Moor;
- Recreational walking routes and publicly accessible open space; and
- Informal areas of greenspace used for leisure and wellbeing.

4.1.18. Loss of these green assets would reduce access to open space for local communities.

Index of Multiple Deprivation (2025)

Introduction to IMD

4.1.19. The Index of Multiple Deprivation 2025 (IMD) is an overall relative measure of deprivation, combining seven different domains. These domains will be explored in this Scoping Report (see also **Chapter 5**). Of particular relevance to the Communities and Quality of Life AoS theme are:

- **Living Environment**: the quality of the local environment, categorised into 'indoors living environment' to measure the quality of housing and 'outdoors living environment' to measure indicators like air quality and road traffic accidents; and
- **Health Deprivation and Disability**: the risk of premature death and the impairment of quality of life through poor physical or mental health.

4.1.20. Lower Super Output Areas (LSOAs) are designed to improve the reporting of small-area statistics in England and Wales. These are standardised geographic units intended to be as consistent as possible, with each LSOA typically containing between 1,000 and 1,500 people. In relation to the 2025 IMD, LSOAs are ranked out of 33,755 in England, with a rank of 1 indicating the most deprived area.

Living environment domain

4.1.21. As shown in **Figure 6-1** of the **Scoping Report: Main Body**, the areas surrounding Heathrow Airport predominantly fall within the lower-ranked 50% of LSOAs in England for the Living Environment domain. Some of the most deprived pockets in the immediate vicinity include the LSOAs adjacent to the airport boundary, as well as parts of west Hounslow and south Hillingdon.

4.1.22. The LSOAs covering the core study area are themselves comparatively deprived for the Living Environment domain, ranking within the 66%-81% most deprived nationally. These sit alongside neighbouring LSOAs with relatively low levels of deprivation (within the 40%–50% least deprived nationally). This localised contrast indicates that airport expansion has the potential to affect communities with differing levels of resilience and vulnerability.

Health deprivation and disability domain

4.1.23. In relation to the Health Deprivation and Disability domain (see **Figure 6-2** in the **Scoping Report: Main Body**), the areas around Heathrow Airport generally perform more favourably than for the Living Environment domain. However, pockets of health-related deprivation remain, particularly in parts of south-west Hounslow, north Spelthorne, and south Hillingdon.

4.1.24. The LSOAs covering the core study area, along with most adjacent LSOAs, are ranked within the 50% least deprived nationally on this domain, suggesting comparatively better health outcomes in this immediate area. Nonetheless, variations across the wider area imply that certain communities may still be more sensitive to changes associated with airport expansion.

4.2. Future baseline

4.2.1. Across both London boroughs and neighbouring authorities such as Slough and Spelthorne, population growth is expected to continue, sustaining strong demand for housing. Local plans already identify capacity constraints, and pressures on affordability and availability are likely to persist. Without additional development, unmet housing need in the wider area is expected to increase.

4.2.2. Growth in population and households is expected to increase demand for health care, education, and other essential services. Without new provision, capacity pressures may intensify, particularly in areas already experiencing high demand. Planned local authority-led improvements to community infrastructure may progress but are unlikely to fully address longer-term pressures.

4.2.3. General health indicators are expected to follow wider regional trends of gradual improvement. However, variations between communities (particularly those facing socio-economic disadvantage) are likely to persist. The wider determinants of health, such as access to green space, air quality, and active travel networks, are not expected to change significantly without major investment.

4.2.4. Existing environmental stressors around Heathrow (such as aviation noise, road traffic noise, localised air quality issues, congestion, and limited access to recreational open space) are expected to continue. Incremental changes may arise from local transport schemes, electrification of vehicles, and air quality initiatives, although improvements are likely to be gradual.

4.2.5. Spatial patterns of deprivation, including those associated with living environment and health outcomes, are expected to remain broadly similar. While some local regeneration initiatives may help address disparities, overall socio-economic patterns across west London and adjoining areas are unlikely to shift markedly in the short to medium term.

5. Economy baseline

The economy chapter focuses on the core study area (see **Figure 2-2** in the **Scoping Report: Main Body**).

5.1. Current baseline

Tourism

5.1.1. Heathrow plays an important role in supporting tourism at the national, regional, and local level. ONS data suggests that the UK received 42.6 million inbound visits in 2024, with spending of £32.5 billion by overseas visitors. Heathrow's Annual Report notes that the airport handled 83.9 million passengers in 2024, of which 94% were international travellers, underscoring its role as the UK's principal gateway for inbound tourism. Given this significance, any airport expansion has the potential to enhance inbound tourism further by increasing capacity, improving connectivity, and supporting growth in visitor-related economic activity.

5.1.2. Regionally, Heathrow strengthens London's status as the UK's primary tourism destination. Record travel demand saw the airport surpass 8 million passengers in a single month (August 2025), helping to drive the recovery of London's visitor economy and supporting hospitality, retail, and cultural sectors across the capital and South East. Expansion could amplify these benefits by supporting a larger visitor economy, increasing demand for accommodation and services, and attracting new long-haul routes.

5.1.3. Overall, Heathrow is a key driver of inbound tourism flows and associated economic activity at all scales, and changes to airport capacity are likely to have proportionate implications for UK tourism performance.

Freight

5.1.4. Heathrow plays a nationally significant role in freight and trade connectivity. It handles more cargo by weight than all other UK airports combined, reflecting its position as the UK's principal gateway for high-value international trade. DfT's report on the economic benefits of the northwest runway expansion notes that around 95% of freight is transported in the hold of passenger aircraft, meaning that passenger growth directly supports freight capacity.

Employment

5.1.5. Heathrow is one of the UK's most important employment hubs, generating jobs directly on the airport site and supporting wider employment across the region through its supply chain. The concentration of employment opportunities supports local labour markets and provides a significant source of accessible jobs, including for lower-income households and those without advanced qualifications. Expansion would be expected to generate additional construction-phase employment as well as long-term operational roles, reinforcing Heathrow's role as an economic anchor for surrounding communities.

5.1.6. According to an Oxford Economics study, Heathrow directly generated £6.36 billion in Gross Value Added (GVA) (a standard measure of the value an organisation contributes to the economy through its goods and services) and employed 83,400 workers in 2023, with an additional 10,800 indirect (supply chain) jobs supported across the Heathrow Catchment Area (comprising nice local authority areas). This reflects the airport's role as a major national employer and contributor to UK labour productivity in aviation, transport, retail, logistics, and related services.

5.1.7. Future expansion would be expected to increase these direct and indirect employment effects, and may also strengthen job creation as more firms are attracted to locate near a globally connected hub. National analysis undertaken in 2016 for the Airports Commission indicates that Heathrow expansion could ultimately support substantial employment growth, with estimates of up to 77,000 additional local jobs by 2030.

5.1.8. At the local scale, it is also noted that the core study area includes several existing employment sites and employment land allocations within local plans; as such, potential expansion could lead to some localised loss or displacement of employment land, which would need to be managed to minimise adverse impacts on local businesses and jobs.

Local unemployment rates

5.1.9. Despite the scale of employment opportunities associated with Heathrow Airport, unemployment remains a challenge in the surrounding area. For example, in Hillingdon, ONS data records that the unemployment rate at the end of 2023 was 7.0%, which is an increase from 4.3% the previous year. For the purpose of these statistics, 'unemployed' is defined as '*those without jobs who are actively seeking work and available to take up a job'*. This rise highlights that expansion alone may not guarantee reduced unemployment; local barriers to employment must be addressed if communities are to benefit from new job opportunities.

5.1.10. Similarly, the claimant count (an experimental statistic that measures the number of people who are claiming unemployment-related benefits) has increased. ONS data from March 2024 records that the claimant count in Hillingdon was 8,970 - an increase from 7,920 in March 2023.

5.1.11. The rise in claimant numbers reinforces the pattern of growing unemployment and highlights that access to airport-related jobs does not fully offset wider socio-economic challenges facing the local population. Future expansion must therefore be accompanied by targeted skills, training, and employability initiatives to ensure local residents can access new employment opportunities.

Index of Multiple Deprivation 2025

Introduction to IMD

5.1.12. The Index of Multiple Deprivation 2025 (IMD) is an overall relative measure of deprivation, combining seven different domains. These domains will be explored in this Scoping Report (see also **Chapter 4**). Of particular relevance to the Economy AoS theme are:

- **Education and skills:** the lack of attainment and skills in the population;
- **Employment**: the proportion of the working-age population involuntarily excluded from the labour market, including those who want to work but cannot; and
- **Income**: the proportion of the population experiencing a deprivation relating to low income.

Income domain

5.1.13. The areas surrounding Heathrow Airport predominantly fall within the more deprived LSOAs in England for the Income domain (see **Figure 7-1** of the **Scoping Report: Main Body)**. For wider context, the London Borough of Hillingdon is considered to be more deprived than 77% of local authorities in England for this domain.

5.1.14. Low-income levels mean that many local households may remain economically vulnerable despite the presence of a major employer nearby; without deliberate inclusion strategies, expansion may not translate into improvements in living standards for these communities.

Employment domain

5.1.15. The areas surrounding Heathrow Airport are a mix of more and less deprived LSOAs in England in relation to this domain (see **Figure 7-2** of the **Scoping Report: Main Body**). For wider context, the London Borough of Hillingdon is considered to be less deprived than 52% of the local authorities across England.

5.1.16. This variation suggests that while some communities may be well positioned to benefit from airport-related job growth, others already further from the labour market may not automatically see improvements. Localised barriers such as childcare, transport, or health constraints may limit take-up.

Education and skills domain

5.1.17. As shown in **Figure 7-3** of the **Scoping Report: Main Body**, the areas surrounding Heathrow Airport predominantly fall within the more deprived LSOAs in England for the Education and skills domain. For wider context, the London Borough of Hillingdon is considered to be more deprived than 55% of local authorities across England.

5.1.18. This indicates a local skills gap that may limit residents' ability to access higher-value employment opportunities generated by the airport, including roles created through any future expansion. Without targeted skills development, existing inequalities may persist or widen.

5.2. Future baseline

5.2.1. The future economic baseline around Heathrow is expected to continue reflecting strong national and regional demand for international connectivity. Passenger numbers are forecast to remain high, sustaining demand for aviation-related employment and supporting sectors such as tourism, logistics, and business services. The Department for Transport's Updated Appraisal Report (2017) indicates that London's airports are expected to be full by the mid-2030s, reinforcing the likelihood of continued capacity pressure at the airport. It is worth noting, however, that this report does not account for the approved expansions at Luton Airport or Gatwick Airport. The forecasts are being updated as part of the ANPS review, and the updated forecasts will inform the main AoS report, which will be published alongside any draft HENPS in summer 2026.

5.2.2. Economic activity in the surrounding area is likely to remain closely tied to Heathrow's operational scale. Continued growth in passenger demand, retail spending, cargo throughput, and aviation services is expected to drive employment opportunities, maintaining the airport's role as a major regional economic anchor.

5.2.3. At the national level, the UK aviation sector is entering a period of renewed expansion and investment. Both Gatwick and Luton Airports are progressing major capacity-enhancement programmes, with the Government approving Gatwick's northern runway scheme in September 2025 and Luton advancing its own expansion plans to increase passenger capacity. Gatwick's £2.2 billion project will enable dual-runway operations, increasing capacity from around 280,000 to 389,000 flights annually and supporting up to 14,000 new jobs and £1 billion in economic activity per year, while Luton's growth ambitions similarly reflect a sector-wide trajectory of increased demand and infrastructure investment.

5.2.4. The approval of Gatwick's expansion, alongside Luton's planned capacity increases, represents a significant shift in the UK's competitive airport landscape. Additional capacity at these airports may influence the distribution of future passenger demand, investment, airline route strategies, and employment patterns across the South East. While Heathrow is expected to retain its position as the UK's primary hub airport, competition for airlines, workforce, and associated economic activity may intensify, with potential implications for future growth trajectories in the surrounding labour market.

5.2.5. Looking ahead, broader economic drivers (including changes in international travel demand, evolving airline networks, carbon-reduction policies, and technological developments such as sustainable aviation fuels) will shape Heathrow's economic context.

6. Historic environment baseline

The historic environment chapter focuses on the core study area (see **Figure 2-2** in the **Scoping Report: Main Body**).

6.1. Current baseline

Designated sites

6.1.1. Within this sub-section, different study distances have been applied for different categories of designated heritage assets to reflect their sensitivity and the nature of potential impact pathways, in line with established assessment practice. More sensitive assets with wider settings, such as World Heritage Sites (WHS), have been considered within a broader 10 km study area, reflecting their outstanding universal value and potential sensitivity to indirect effects including noise and changes to setting. Nationally designated assets (including listed buildings, scheduled monuments and registered parks and gardens) have been considered within a 5 km study area, reflecting the scale at which direct physical and setting effects are most likely to arise.

6.1.2. WHS are designated by UNESCO for their outstanding universal value and are protected through the World Heritage Convention. There is one WHS within 10 km of the core study area: the Royal Botanic Gardens, Kew, with its buffer zone and core area located approximately 6.4 km and 7.3 km, respectively from the current Heathrow site. Set amongst a series of parks and estates along the River Thames' south-western reaches, Kew Gardens' historic landscape garden includes work by internationally renowned landscape architects Bridgeman, Kent, Chambers, Capability Brown and Nesfield illustrating significant periods in garden design from the 18th to the 20th centuries. The gardens house extensive botanic collections (conserved plants, living plants and documents) that have been considerably enriched through the centuries. Since their creation in 1759, the gardens have made a significant and uninterrupted contribution to the study of plant diversity, plant systematics and economic botany

6.1.3. Listed buildings are designated heritage assets, of national importance, which are protected through the Planning (Listed Buildings and Conservation Areas) Act 1990. A search on the DEFRA's Magic mapping website indicates that there are 2,769 listed buildings located within 5 km of the core study area, comprising 40 Grade I, 1,127 Grade II*, and 1,602 Grade II buildings. Many of these fall within the core study area; therefore, there is potential for direct effects on these important heritage assets.

6.1.4. Scheduled monuments are nationally important archaeological sites or historic buildings that are identified and assessed by Historic England, which advises the Secretary of State on their designation under the Ancient Monuments and Archaeological Areas Act 1979. There are 29 scheduled monuments within 5 km of core study area. They range from prehistoric features, such as Neolithic causewayed enclosures and Bronze Age settlement sites, to Romano-British remains, and later historic structures including a 17th-century schoolhouse and an 18th-century garden pavilion.

6.1.5. Registered parks and gardens are designated areas of special historic interest in the UK, recognised for their significant landscape design, historical associations, or horticultural value. These sites are listed on the Register of Historic Parks and Gardens, maintained by Historic England, to ensure their preservation and protection for future generations. There are 25 registered parks and gardens within 5 km of core study area: six Grade I (all associated with the Royal Windsor Estate); six Grade II*; and 13 Grade II.

6.1.6. The WHS, listed buildings, scheduled monuments, and registered parks and gardens are shown in **Figures 8-1 to 8-3** in the **Scoping Report: Main Body**.

6.1.7. The abundance of designated sites near Heathrow Airport reflects the area's rich historic environment, which contributes significantly to local character and cultural heritage. This concentration of nationally important assets means that any airport expansion could have notable implications for heritage significance and setting, a key consideration under the draft HENPS, which requires robust assessment and mitigation of such impacts.

Conservation areas

6.1.8. Conservation areas (CA) are places of historical or architectural importance protected under the Planning (Listed Buildings and Conservation Areas) Act 1990. Stricter planning rules apply, requiring permission for demolitions, significant alterations, or new developments to preserve their character. These areas often contain clusters of listed buildings, historic streetscapes, and landscapes that contribute to the distinctive character of the wider setting.

6.1.9. There are numerous conservation areas in proximity to Heathrow Airport, with 16 located within 3 km of the existing airport boundary (and many more within the wider area):

- Longford Village CA (London Borough of Hillingdon)
- Harlington Village CA (London Borough of Hillingdon)
- Harmondsworth Village CA (London Borough of Hillingdon)
- Cranford Park CA (London Borough of Hillingdon)
- Bulls Bridge CA (London Borough of Hillingdon)
- Botwell: Nestles CA (London Borough of Hillingdon)
- Botwell: Thorn EMI CA (London Borough of Hillingdon)
- West Drayton Green CA (London Borough of Hillingdon)
- Canalside CA (London Borough of Hounslow)
- St Paul's Church (London Borough of Hounslow)
- Hounslow Cavalry Barracks (London Borough of Hounslow)
- Feltham Town Centre (London Borough of Hounslow)
- St Dunstan's (London Borough of Hounslow)
- Bedfont Green (London Borough of Hounslow)
- Stanwell CA (Spelthorne District)
- Colnbrook CA (Slough Borough)

6.1.10. Information on these designated areas is available on the respective Authority's website, including boundary maps, character area maps, and character appraisals.

6.1.11. The presence of multiple CAs close to Heathrow means that airport expansion could affect their character and setting through increased development pressure, changes in traffic patterns, and visual or noise impacts.

Heritage at risk

6.1.12. The Heritage at Risk Register, maintained by Historic England, identifies designated heritage assets that are vulnerable due to neglect, decay, or inappropriate development. Some of the CAs and designated assets within 5 km of Heathrow Airport may be included on this register, indicating they are considered 'at risk'. The status of these assets will be examined in detail during the Environmental Report stage to assess potential impacts and inform appropriate mitigation measures.

Locally important heritage features

6.1.13. Not all historic environment features within the Heathrow area are subject to statutory designations. Despite this, non-designated heritage assets remain important elements of local character and identity, valued by communities across Hillingdon and the wider area.

6.1.14. The London Borough of Hillingdon maintains a local list of non-designated heritage assets, including buildings, structures, and features of local historic or architectural interest. These are often identified through conservation area appraisals, community engagement, and planning processes.

6.1.15. Neighbouring London boroughs such as Hounslow, as well as non-London authorities including Spelthorne, also maintain similar local lists. These may include assets within the wider airport influence area, which could be sensitive to development.

6.1.16. The presence of these locally valued assets means that Heathrow expansion could affect features that contribute strongly to community identity and sense of place.

6.1.17. The Greater London Historic Environment Record (HER), along with local registers maintained by Hillingdon and neighbouring authorities, will be reviewed in detail during the Environmental Report stage to identify non-designated heritage assets and assess potential impacts arising from the proposed development.

Archaeological significance

6.1.18. In 2025 an Archaeological Desk Based Assessment was conducted in the Heathrow area by RPSGroup. It notes that the Airport (and large parts of the core study area lie) within an area of high archaeological potential, with evidence of human activity spanning thousands of years. The airport footprint and its immediate surroundings (including northern parts of the core study area) are designated as an Archaeological Priority Zone (APZ), reflecting the likelihood of significant buried heritage. Excavations and assessments have revealed remains from the Neolithic, Bronze Age, and Iron Age, as well as significant Roman and Saxon occupation. Previous investigations during airport development have uncovered settlement features, burial sites, and artefacts, indicating that the landscape was intensively used throughout prehistory and early historic periods. The scale of past discoveries suggests that undisturbed areas around the airport boundary may still contain important archaeological deposits.

6.1.19. Beyond the airport boundary, Hillingdon contains several other Archaeological Priority Areas (APAs), including Harmondsworth and Harlington, which have produced important prehistoric and historic finds. Neighbouring authorities (such as Hounslow, Spelthorne, and Slough, and South Bucks) also have areas of archaeological interest. During the Environmental Report stage, the Greater London Historic Environment Record (GLHER) and local APA mapping will be reviewed in detail to identify sensitive areas and inform appropriate mitigation.

6.1.20. Given Heathrow's location within an APA and its proven archaeological richness, expansion could result in the loss or disturbance of irreplaceable heritage assets, making early and robust archaeological assessment essential under the draft HENPS.

Historic England advice on potential expansion impacts

6.1.21. Historic England has highlighted the scale of potential impacts associated with a north-west runway at Heathrow. In its 2018 consultation response on the expansion proposals, Historic England noted that this option would be '*the most damaging in terms of the historic environment*', potentially resulting in the loss of 21 designated heritage assets, including the total loss of Longford Village Conservation Area and the loss of a substantial part of Harmondsworth Village Conservation Area. It also identified that approximately 220 additional designated heritage assets (including The Great Barn - Grade I) will experience effects upon their setting.

6.1.22. Historic England also emphasised the importance of considering cumulative effects, noting that impacts on villages such as Harmondsworth may arise not only from the runway land-take but also from associated road realignments, displaced land uses and supporting infrastructure. These cumulative changes could together lead to substantial harm to the significance of conservation areas and their constituent listed buildings, and should therefore be addressed explicitly in scheme design and assessment.

6.1.23. The consultation response further highlighted the exceptional archaeological sensitivity of the Heathrow area, describing it as a '*highly significant multi-period archaeological landscape*', and recommended a robust, research-led approach to archaeological evaluation and mitigation, building on the successful model used for Terminal 5. Potential changes to hydrology, including river diversions, were noted as posing particular risks to buried archaeological remains.

6.2. Future baseline

6.2.1. Designated and non-designated heritage assets will continue to have some measure of protection under the National Planning Policy Framework (NPPF) and relevant Local Plans. However, future development associated with Heathrow expansion is likely to lead to loss of key features, increase pressure on historic character and settings, alter historic settlement patterns, and disrupt valued views. These changes could affect both nationally designated sites and locally important heritage features, making heritage management a critical consideration for the project.

6.2.2. Climate change adds further complexity, with extreme weather, increased rainfall, and higher humidity accelerating material decay and threatening archaeological deposits through waterlogging or erosion. While coastal sites face permanent loss, inland assets around Heathrow may require enhanced drainage and conservation measures. Digital documentation and sustainable management strategies will be essential to safeguard heritage in the long term.

6.2.3. Together, these factors mean that the future baseline to heritage assets near Heathrow will face cumulative pressures from expansion and environmental change.

7. Landscape baseline

The landscape chapter focuses on the core and (where relevant) extended study areas (see **Figure 2-2** in the **Scoping Report: Main Body**).

7.1. Current baseline

Protected landscapes

7.1.1. Whilst there are no nationally protected landscapes within immediate proximity of the core study area, it is recognised that two National Landscapes are within 25 km of core study area. This includes the Chilterns National Landscape to the north and north-west, and Surrey Hills National Landscape to the south. The former lies approximately 2 km from the northern reaches of the extended study area.

7.1.2. The Chilterns National Landscape is characterised by rolling hills, wooded valleys and steep chalk escarpments, which have been shaped by natural and human influences. It has a number of special qualities that are considered important on a national and international level, which include (but is not limited to):

- Panoramic views from and across the escarpment interwoven with intimate dip-slope valleys and rolling fields;
- Relative tranquillity and peace on the doorstep of ten million people, one of the most accessible protected landscapes in Europe; relatively dark skies, of great value to human and wildlife health; unspoilt countryside, secret corners and a surprising sense of remoteness;
- Numerous ancient routeways and sunken lanes including the Icknield Way, considered by many to be the oldest road in Britain; and
- Significant ancient hedgerows, hedgerow and field trees, orchards and parkland weaving across farmland that covers approximately 60% of the Chilterns.

7.1.3. The Surrey Hills National Landscape is characterised by a nature-rich landscape that is enjoyed and appreciated by all parts of society. It has a number of special qualities that are considered important. This includes (but is not limited to):

- Tranquillity and darker skies – many parts of the Surrey Hill still retain a feeling of remoteness, isolation and tranquillity, including dark skies at night;

- Routeways: country lanes and rights of way, which cross the designation and have considerable biodiversity and antiquity value; and

- Hills and views – panoramic views are obtained from the many vantage points spread through the designated landscape, the result of which is that Surrey Hills has views that may be considered amongst the best and most diverse in England.

National character areas

7.1.4. Natural England has produced national character area (NCA) profiles which outline the landscape character of different areas and explain how that character has arisen and is changing. The core and extended study areas are covered by one NCA – Thames Valley (115).

7.1.5. Key characteristics of the NCA includes:

- Flat and low-lying land, rising to low, river-terraced hills, which include the prominent local outcrop of chalk on which Windsor Castle sits. The underlying geology is dominated by the London Clay which, over much of the area, is overlain by river-lain sands and gravels;

- The numerous hydrological features provide unity to an area which otherwise lacks homogeny; these features include the River Thames and its tributaries, streams, lakes, canals and open waterbodies (the result of restored gravel workings). To the south, the open Thames flood plain dominates, with its associated flat grazing land, becoming characterised by a number of formal historic landscapes on higher ground. Between Hampton and Kew, the River Thames forms the focus of a series of designated landscapes. The river is closely associated with numerous historic places and cultural events, such as the signing of Magna Carta at Runnymede. Tourists from all over the world are drawn to the rich heritage of the area, flocking to attractions like Hampton Court Palace and Windsor Castle;

- Although densely populated and developed, pockets of woodland, open grassland, parkland, wetlands and intimate meadows provide escape and tranquillity, and include a variety of habitats supporting important populations of many species, notably invertebrates and wildfowl. Woodlands characterise the north-western area, with the wooded character extending up to the southern edges of the Chiltern Hills. There are small but biologically important areas of lowland heathland – especially on higher sandy ground in the north – and a small area to the south falls within the Thames Basin Heaths Special Protection Area buffer zone;

- Farming is limited. Where it survives, grazed pasture is the major land use within a generally open, flat and featureless landscape. The field pattern is medium-scale and irregular, with smaller fields to the west. Localised areas of species-rich hay meadows provide a splash of colour in summer;

- Towards London in the east, the natural character of the area is overtaken by urban influences: a dense network of roads (including the M25 corridor), Heathrow Airport, railway lines, golf courses, pylon lines, reservoirs, extensive mineral extraction and numerous flooded gravel pits;

- The area has an urban character, and there are very few villages of more traditional character, although almost half of the area is greenbelt land and development has been restricted in areas like Crown Estate land and Eton College grounds; and

- The area is important for recreation, both for residents and visitors. Historic parkland and commons provide access to green space, the Thames Path National Trail runs the length of the NCA, and a variety of activities are enjoyed on the river and other waterbodies.

Local landscape designations

7.1.6. In addition to national landscape designations, the core and extended study areas overlap with several local landscape designations. For example, the Hillingdon Townscape Character Study demonstrates that there are multiple landscape and townscape character types within the borough (and the study area). The Study identifies Heathrow Airport as being of the gravel terrace infrastructure landscape character type. Other landscape character types within proximity include floodplain and open gravel terrace. It is recognised that several townscape character types are also within proximity: commercial airport, historic core, and inter-war suburb / metroland. The special characteristics of these landscape and townscape character types will be a useful evidence base for the SA. Local landscape assessments have also been produced for Three Rivers, Spelthorne, and Buckinghamshire.

Tree preservation orders

7.1.7. A Tree Preservation Order (TPO) is a legal measure used by local planning authorities to protect specific trees, groups of trees, or woodlands from being cut down, topped, lopped, uprooted, or otherwise damaged without prior consent. TPOs are typically placed on trees that offer significant amenity value to the local environment. Similar protections are afforded to trees within designated conservation areas.

7.1.8. Both Hillingdon Council and Slough Council provide interactive tree maps showing that TPOs are distributed throughout the core study area, and within the adjacent areas. Furthermore, mapping provided by Spelthorne Borough Council demonstrates there are TPOs to the south of the airport. TPOs data is currently unavailable for the London Borough of Hounslow, which is located adjacent to the south-east of Heathrow. During the subsequent stages of the AoS process, the TPO mapping shall be explored in further detail to consider the potential impacts associated with the Local Plan proposals on these assets.

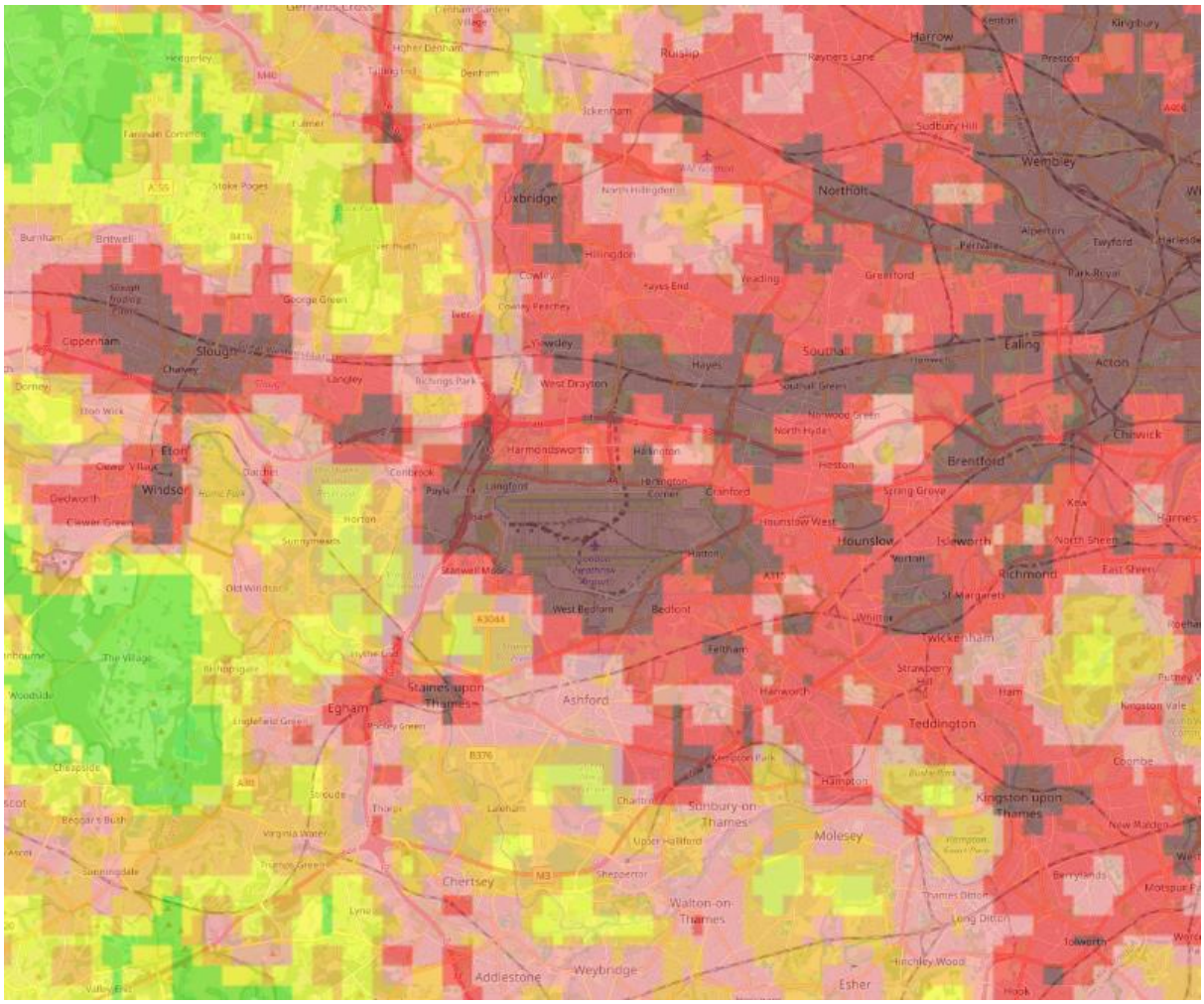
Dark skies and tranquillity

7.1.9. Tranquillity is an established component of landscape character, recognised in planning guidance and case law as contributing to the quality and enjoyment of landscapes. Tranquil areas typically exhibit low levels of visual intrusion, artificial lighting, and noise, supporting biodiversity, recreation, and cultural heritage. Dark skies are similarly valued for their ecological benefits and contribution to sense of place, with national guidance encouraging minimisation of light pollution.

7.1.10. In 2016, CPRE produced an interactive map depicting the level of light pollution and dark skies in Britain. The map shows that Heathrow Airport and the areas in immediate proximity have a minimum of 8 nanowatts/cm^2/sr – and the airport itself has the brightest lighting level of >32 nanowatts/cm^2/sr. Whilst bright light continues eastwards, lighting gets darker to the north and west of the core study area. This is likely associated with proximity to the Chilterns National Landscape.

7.1.11. A further study conducted by CPRE in 2023 suggests that areas of ‘very severe’ and ‘severe’ light pollution have been documented in London (see **Figure 7-1**), based on the number of stars visible to the naked eye in the night sky. Whilst the study does not discuss results on a local scale, it does conclude that around 75% of people living in the UK have an obscured view of the night sky.

Figure 7-1: Light Pollution and Dark Skies Around the Core Study Area (CPRE)



Night Lights

(NanoWatts / cm^2/sr)

- >32 (Brightest)
- 16 - 32
- 8 - 16
- 4 - 8
- 2 - 4 (Brighter)
- 1 - 2
- 0.5 - 1
- 0.25 - 0.5
- < 0.25 (Darkest)

Each pixel shows the level of radiance (night lights) shining up into the night sky. These have been categorised into colour bands to distinguish between different light levels.

Green belt

7.1.12. The London Area Green Belt is 486,000 ha, and includes parts of outer London boroughs, as well as large areas of Hertfordshire, Essex, Kent, Surrey, Berkshire, Buckinghamshire and Bedfordshire.

7.1.13. Benefits of the London Area Green Belt include:

- Prevention of the high costs of urban sprawl. With urban sprawl comes increased car use and travel costs, more expensive road construction and maintenance, decreased economic vitality of urban centres, higher air pollution and health-care costs, and the loss of productive land for farming and tourism;
- Safeguarding of agricultural use, local food production and its proximity to potential markets in the city;
- Promotion of recreation and sport, including country parks and playing fields;
- Enhancement of health and reduction of stress by providing peaceful, natural breathing spaces and 9,899 km of public rights of way around the capital; and
- Eco-system advantages including urban cooling, improved air quality, flood mitigation and carbon absorption (especially woodland areas).

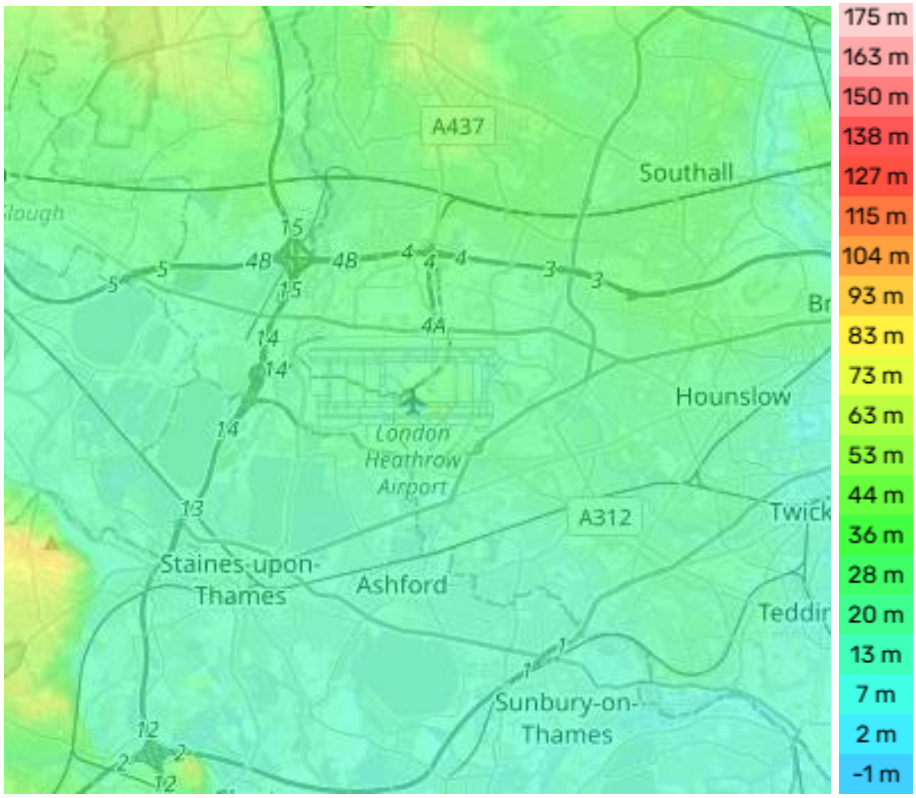
7.1.14. The London Area Green Belt surrounds Heathrow Airport, extending northwards through Hillingdon, southwards through Spelthorne and Hounslow, and westwards through South Bucks and Windsor and Maidenhead. It protects against the coalescence of settlements within the London Borough of Hillingdon and within proximity, though it is recognised that it is fragmented in the southern extent around the airport.

7.1.15. The recent update to the NPPF has introduced the concept of the ‘grey belt’, which refers to previously developed or lower-value land within the Green Belt that could be considered for redevelopment. This change seeks to strike a balance between conservation and the need for more housing by prioritising underused sites rather than untouched countryside. This may result in changes to the area surrounding Heathrow Airport if available grey belt land is released for developed.

Topography

7.1.16. According to the Hillingdon Townscape Character Study, the topography of the core study area is predominantly flat and relatively low lying, with elevation gentle rising to the north (also see the topographic map in **Figure 7-2**). This relative lack of undulation may reduce the potential adverse landscape impacts of a development in that area.

Figure 7-2: Topography in the Core Study Area



7.2. Future baseline

7.2.1. Whilst the area around Heathrow Airport is largely built out, development has the potential to lead to incremental changes in the visual character and quality of the local landscape and townscape. For example, this includes potential visual disruptions to the local landscape and townscape character types that are within proximity to the airport.

7.2.2. More widely, development has the potential to disrupt the tranquillity of two landscape designations – given that tranquillity is noted to be a contributing factor to the special characters and qualities of the Chilterns and the Surrey Hills National Landscapes. This is linked to the potential for long distance views to be adversely affected through development, as well as the potential for changes to flight paths, and the associated impacts associated with additional air traffic travelling over these designated landscapes.

7.2.3. Currently the London Area Green Belt works to separate Heathrow Airport from nearby residential areas, especially to the west. However, it is recognised that the green belt is fragmented around the airport. Given the recent updates to the NPPF, this fragmentation could lend to these parcels being identified as grey belt, and redeveloped, including to the south in Hounslow. This could lead to cumulative effects if neighbouring local planning authorities also identify grey belt land suitable for redevelopment, or release green belt parcels for growth.

7.2.4. Climate change has the potential to impact upon landscape character, including through direct impacts including flooding events, which could alter the visual amenity of landscapes. Although some climate change effects are unlikely to impact upon landscape directly, it could change how the landscape is used – which could have an adverse effect on landscape character. For example, this could include changes to important habitats that contribute to the National Character Area.

8. Noise baseline

The noise chapter focuses on the core study area (see **Figure 2-2** in the **Scoping Report: Main Body**).

8.1. Current baseline

Activity at Heathrow Airport

8.1.1. The noise environment around Heathrow is dominated by aviation activity, including aircraft arrivals, departures and ground operations. Aircraft noise currently forms one of the most significant environmental pressures on surrounding communities, reflecting Heathrow's status as the UK's busiest airport. Noise exposure varies according to runway usage, wind direction and aircraft type, with flight paths extending across a wide area of West London and neighbouring authorities.

8.1.2. Noise contours, as shown in the UK Civil Aviation Authority's ERCD Report 2501, show that significant populations in the London Boroughs of Hillingdon, Hounslow, Richmond upon Thames and Ealing, as well as communities in Spelthorne, Slough and Windsor and Maidenhead, experience elevated levels of aircraft noise. Some communities beneath arrival and departure routes are exposed to regular overflight, with particular sensitivities associated with periods of runway alternation and night-time operations.

8.1.3. The ERCD Report 2501 provides the most recent noise-monitoring results for the Heathrow area. For the 2024 average summer day (LAeq,16h), the 54 dB (the lowest noise level that causes annoyance, used as the threshold) contour area was 129.3 km^2, enclosing 400,900 people - a 2% increase in population exposure compared with 2023. Aircraft movements increased slightly, and changes in runway usage and population growth within affected areas contributed to the rise in population exposure.

8.1.4. For the 2024 average summer night (LAeq,8h), the 48 dB contour area expanded to 94.1 km^2, with 372,400 people living within this contour. This represents a 14% increase in population exposure from 2023. Night movements rose by 6% year-on-year, contributing to these changes.

8.1.5. Annual results for Lden (a 24-hour averaged noise metric that applies additional weighting to evening and night-time noise to reflect greater sensitivity during these periods) also show upward pressure on noise exposure. The 55 dB Lden contour area increased by 3% in 2024 to 148.4 km^2, and the population within this contour increased by 10% to 561,600 people.

8.1.6. Although year-on-year variability reflects operational and demographic changes, long-term trends since 2006 show reductions in contour areas across most noise metrics due to significant fleet modernisation. However, recent population growth within affected areas has increased the number of people exposed at key contour levels.

Ground noise sources

8.1.7. In addition to airborne noise, there are several sources of ground noise associated with activity at Heathrow. These include aircraft taxiing, engine run-ups, auxiliary power unit (APU) use, ground handling equipment, construction and maintenance activities, and noise from service yards and logistics areas. Ground noise can contribute to overall noise exposure for communities located close to the airport perimeter, particularly in parts of Longford, Harmondsworth, Sipson, Stanwell Moor and Cranford.

Existing noise management measures

8.1.8. As outlined in Heathrow's Noise Action Plan (2024-2028), the airport operates a range of established noise-management measures, including:

- Runway alternation during westerly operations to provide predictable periods of respite;
- Night-time operating restrictions;
- Government-set Night Flight Restrictions under the Night Flights Regime;
- Voluntary commitments intended to minimise late-running and early-morning flights; and
- A suite of noise-abatement procedures such as:
  - Noise Preferential Routes (NPRs);
  - Continuous Descent Approaches
  - Minimum climb gradients; and
  - limits on reverse thrust at night.

8.1.9. The Plan also identifies controls on ground-based noise sources through Operational Safety Instructions, including restrictions on engine ground runs and the management of Auxiliary Power Unit (APU) use, with a commitment to implement a new Ground Noise Management Plan during this Action Plan period.

8.1.10. Heathrow additionally provides noise insulation and mitigation schemes for eligible homes, schools and community buildings, and maintains formal mechanisms for ongoing community engagement, information provision, and complaint handling. These measures form part of the airport's current noise-management framework; however, the Noise Action Plan acknowledges that aircraft and ground operations continue to result in noise impacts for communities living around the airport.

Noise impact areas

8.1.11. Transport-related noise also forms part of the existing baseline. Major road corridors such as the M4, M25, A4 and A30 contribute to elevated traffic noise, alongside increasing freight and logistics activity associated with the airport. Rail noise associated with the Elizabeth Line, Heathrow Express and Piccadilly Line further contributes to the acoustic environment, particularly around stations and rail alignments near the airport.

8.1.12. Many Noise Important Areas (NIAs) are designated in the vicinity of Heathrow, reflecting the concentration of major road and rail corridors and the high population density of surrounding urban areas. As shown in **Figure 8-1**, NIAs extend across Heathrow's surrounding communities. These NIAs form an important part of the baseline, indicating where communities already experience elevated transport-related noise before any changes associated with airport expansion are considered.

Figure 8-1: Noise Impact Areas Around the Core Study Area (Roads in red; railways in blue)

Sensitive receptors

8.1.13. A range of noise-sensitive receptors lie within areas currently exposed to these noise sources. These include extensive residential communities, schools, hospitals, care homes, places of worship and publicly accessible open spaces. Areas valued for quiet and tranquillity (such as parts of the Colne Valley Regional Park and several local parks) are also affected by overflight and transport noise.

8.1.14. Exposure to aircraft and transport noise is associated with a range of effects on human health and wellbeing, including annoyance, sleep disturbance and potential impacts on education performance for children in schools located under flight paths (see **Chapter 5** for more detail).

8.2. Future baseline

8.2.1. In the absence of expansion, noise conditions around Heathrow would continue to be shaped by the airport's existing operational limits, including the current movement cap and two-runway configuration. Although Heathrow is operating close to capacity, incremental changes may occur through adjustments to aircraft scheduling, airline fleet renewal and the gradual uptake of quieter, more modern aircraft types. These factors may lead to modest reductions in noise from individual aircraft, although overall noise exposure will remain strongly influenced by underlying demand patterns and the constraints of current runway infrastructure.

8.2.2. The ongoing implementation of the UK Airspace Modernisation Strategy (AMS) is expected to introduce changes to flight paths, air traffic management practices and the design of arrival and departure routes. While the final configuration of flightpath changes remains undetermined, airspace modernisation may alter the distribution of noise around Heathrow, with some communities experiencing reduced exposure and others potentially experiencing increases.

8.2.3. National aviation capacity is likely to evolve over the coming years, including redevelopment or expansion at other UK airports. Both Gatwick and Luton Airports are progressing major capacity-enhancement schemes: Gatwick through its approved northern runway project (September 2025), enabling around 100,000 additional flights per year and incorporating noise-mitigation measures such as enhanced residential insulation; and Luton through its ongoing plans to increase passenger and aircraft capacity. These developments form part of a broader trend of rising aviation activity in the South East.

8.2.4. Background environmental noise levels within the wider Heathrow area may continue to increase gradually due to growth in road traffic, freight movements and public transport use associated with the West London economy. Over the longer term, wider policy shifts (such as increased uptake of electric vehicles, expansion of rail capacity and investment in active travel) may partially offset these increases. However, traffic-related noise from major roads and rail corridors is likely to remain a persistent component of the baseline acoustic environment.

9. Resources and waste baseline

The resources and waste chapter focuses on the core study area (see **Figure 2-2** in the **Scoping Report: Main Body**).

9.1. Current baseline

Mineral resources

9.1.1. Government guidance defines mineral resources as natural concentrations of minerals or bodies of rock that have the potential to be of economic interest in the present or the future due to their inherent properties. As minerals are a non-renewable resource, minerals safeguarding is deployed as the process through which it is ensured that non-minerals development does not needlessly prevent the future extraction of mineral resources.

9.1.2. The London Plan 2021 identifies four Minerals Planning Authorities in London (Havering, Redbridge, Hillingdon and Hounslow) which must maintain London's five million tonne landbank up to 2041. Hillingdon's landbank apportionment is at least 1.75 million tonnes.

9.1.3. GLA data presents that there are four Mineral Safeguarding Areas (MSAs) in Hillingdon. In accordance with the NPPF, local planning authorities should not normally permit other development proposals in MSAs if it might constrain potential future use for mineral working.

9.1.4. Mineral safeguarding in Slough is guided by the 1997 Minerals Local Plan, the policies of which have been saved and remain in force. Policy 11 of the Minerals Plan establishes a strong presumption against sharp sand and gravel extraction across large parts of eastern Slough.

9.1.5. Mineral safeguarding in Spelthorne is led by the Surrey Minerals Plan which aims to protect important mineral resources from being sterilised by non-mineral development.

9.1.6. There are several MSAs that lie within the core study area, indicating the need to consider potential sterilisation risks in relation to future non-mineral development.

Geological sites

9.1.7. Regionally Important Geological/Geomorphological Site (RIGS) are the most important non-statutory designated sites for geology and geomorphology, representing important sites with educational, historical and recreational value. The other geological designations comprise of Locally Important Geological/Geomorphological Site (LIGS), Sites of Geological Interest, and geological SSSI.

9.1.8. There are three designated geological sites within the core study area:

- Sites of Geological Interest (SGI) 41 Harmondsworth Great Barn, Harmondsworth;
- Greater London Area (GLA) 62 Sipson Lane Complex; and
- GLA 68 Bedfont Lakes.

Waste

9.1.9. **Table 9-1** shows government data for the management of all local authority collected waste in both London and the South East of England. Both are relatively small contributors to landfill waste in comparison to other English regions. However, London sent the largest proportion of their waste to incineration out of all English regions and had the lowest recycling rate. Additionally, despite London Plan objectives for increased self-sufficiency, London remains a net exporter of waste, particularly construction and demolition waste and residual municipal waste, placing reliance on management capacity beyond the capital.

9.1.10. As of 2024, the South East managed the largest tonnage of all local authority waste in England and had one of the highest recycling rates out of all English regions.

Table 9-1: Management of all local authority collected waste in London and the South East 2023/24 (thousand tonnes)

	Landfill	Incineration	Recycling	Total
London	2	2,315	1,017	**3,334**
South East	85	2,005	1,827	**3,917**

9.1.11. The destinations for Heathrow Airport's waste are not fully known. However, it is expected that the Airport will make use of a number of facilities within London or the South East.

9.1.12. Heathrow Airport generates a wide range of waste associated with airport operations, activities and construction. Heathrow currently operates a waste management system that priorities segregation at source, on-site consolidation and off-site treatment. Since 2021, Heathrow has not sent any operational waste to landfill.

9.1.13. There are strict legal requirements concerning the management of aircraft cabin waste, particularly in relation to international flights carrying catering waste. This type of waste is considered to be high risk and is incinerated immediately to mediate potential biosecurity risks. In 2024, 5.165 tonnes of aircraft cabin cleaning waste was generated by airlines operating from Heathrow, which amounted to 23% of total operation waste.

9.1.14. Non-recyclable general waste and recycling are treated at separate facilities in Colnbrook, which is located close to Heathrow in Slough. The non-recyclable waste collected from Heathrow, local authorities and other business contributes towards energy production, and produces enough power to provide electricity to 56,000 homes.

9.1.15. **Table 9-2** shows Heathrow Airport data on total waste generation from airport operations and passenger numbers from 2019 to 2024. Total waste numbers in 2019 are slightly higher than in 2024 despite fewer total passenger numbers. Heathrow attributes this decrease to digitising of passenger journeys and efforts to removed liquid waste prior to security lanes. Recycling performance has also improved since 2019, with around 58% of total waste recycled at Heathrow in 2024.

Table 9-2: Airport operations waste data and passenger numbers (2019-2024)

	2019	2020	2021	2022	2023	2024
Total waste (tonnes)	23,934	9,023	8,009	17,270	21,687	22,054
Passenger numbers (millions)	80.8	22.1	19.4	61.6	79.2	83.9

9.1.16. Waste from construction activities such as refurbishment, new infrastructure and asset management is the primary source of waste from the airport. In 2024, 124,050 tonnes of construction, demolition and excavation waste was generated. Across major projects, 82% was recycled, 14% was recovered as refuse derived fuel and less than 4% was landfilled.

9.1.17. Waste management practices at the airport are guided by Heathrow's Resources and Waste Strategy, which seeks to reduce waste generation, increase reuse and recycling, use more sustainable materials and decouple waste growth from passenger growth.

9.1.18. The West London Waste Plan provides the planning framework for managing waste across the West London Boroughs up to 2031, identifying sufficient sites and capacity to manage waste sustainably in line with the London Plan and national waste policy. The plan identifies the need for additional waste management facilities in West London during the Plan period up to 2031 to manage future waste disposal needs.

9.1.19. It is worth noting that the core study area overlaps with existing waste processing facilities (such as the Biffa and Grundon sites off Colnbrook By-Pass). The expansion could, therefore, result in the relocation of these facilities.

9.2. Future baseline

9.2.1. Regarding minerals, demand is likely to grow alongside population growth and infrastructure development. Provisions within national planning policy are likely to continue to ensure that extraction of mineral resources is maintained at a sustainable rate. The capacity of existing mineral resources will need to be monitored to ensure that they can cope with rising demand.

9.2.2. Regarding waste, demand for processing is likely to grow alongside population increases and urban expansion. The capacity of existing waste management infrastructure will need to be regularly assessed to ensure it can cope with the increasing demand. When identifying potential sites for new waste facilities, it will be important to assess any potential impacts these facilities might have on nearby communities, as well as any associated environmental risks such as emissions or leachate.

9.2.3. In the absence of the draft HENPS, waste generation from Heathrow would likely continue to decrease as more sustainable and efficient waste management practices are implemented. Furthermore, given that Heathrow is operating close to capacity, it is unlikely that total waste generated from airlines or airport operations would substantially increase.

9.2.4. The Environmental Targets (Residual Waste) (England) Regulations 2023 set a statutory target to ensure that the total mass of all residual waste (excluding major mineral wastes) does not exceed 287 kg per person in 2042. This would be a 50% reduction from 2019 levels.

10. Soils baseline

The soils chapter focuses on the core and (where appropriate) extended study areas (see **Figure 2-2** in the **Scoping Report: Main Body**).

10.1. Current baseline

Soils

10.1.1. Natural England's Summary of evidence: Soils report highlights the importance of soils as a fundamental component of the environment. Soils are formed from mineral and organic matter, water and air, through interactions between climate, organisms, parent material and topography over long timescales. They provide essential functions that underpin ecosystem services, including nutrient cycling, water regulation, carbon storage and biodiversity.

10.1.2. England's soils are highly diverse, reflecting variations in geology, landform and land management. This diversity influences landscape character and habitat potential. Soils also act as major carbon stores, with peaty soils being particularly significant. However, soils are vulnerable to degradation through erosion, compaction, contamination and loss of organic matter, which can reduce their ability to deliver these functions.

10.1.3. Development can have a significant impact on soils, reducing their capacity to fulfil important functions. Soil loss and sealing are largely irreversible and diminish the ability of soils to provide ecosystem services. Careful planning and soil management during construction can reduce degradation and associated costs. Measures such as maintaining soil organic matter, reducing disturbance and using sustainable drainage systems can help retain soil functions.

10.1.4. Climate change is expected to increase risks of soil erosion, drought and flooding, and influence soil biological processes. Protecting soils and improving their resilience will be important for adaptation strategies.

Agricultural land

10.1.5. The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 are of poorer quality.

10.1.6. The core and extended study areas are primarily underlain by land in non-agricultural and urban use; however, they also lie on significant zones of Grade 1 (Excellent) agricultural land, particularly in the core study area.

The Grade 1 land is found to in the northern and southern extents of the existing airport site, while patches of Grade 3 (Good to Moderate) land are found to the west.

Brownfield sites

10.1.7. Brownfield land, defined as previously developed land no longer in active use, forms part of the land resource within and around Heathrow. Re-use of brownfield land can help reduce pressure on undeveloped areas, make efficient use of existing infrastructure, and support regeneration objectives.

10.1.8. There are several brownfield sites that lie within the core study area. For example, a high-level review of the London Borough of Hillingdon's Brownfield Register (2020) identifies two previously developed sites in the borough within the study area, namely:

- Duval House, High Street UB7 0BT (17762/APP/2019/3373); and
- The Elements, 450 Bath Road, Longford UB7 0EB (26418/APP/2017/2653).

10.1.9. Brownfield sites can present risks associated with contaminated land, particularly where historic industrial, commercial or transport-related uses have occurred. Redevelopment can disturb contaminated soils and potentially mobilise pollutants that pose risks to groundwater, surface water and human health. Any development enabled under the draft HENPS would therefore need to be supported by appropriate site investigation, risk assessment and remediation, in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance and its Approach to Groundwater Protection. This will help ensure that soil and groundwater quality are safeguarded during construction and operation.

10.1.10. As noted in **Chapter 8**, much of the land within the core study area also lies within the London Green Belt. While opportunities exist to utilise brownfield land, the availability and scale of such sites are limited relative to the overall footprint likely to be required for expansion.

Historic landfill sites

10.1.11. Historic landfill sites (HLS), once used for waste disposal, can create challenges for development due to potential contamination from harmful gases and leachate. Development sites near to HLS must conduct site assessments to check for environmental risks, which may require remediation efforts like soil removal or gas monitoring.

10.1.12. The core study area overlies several HLS and is located adjacent to a number of others. The proximity of these sites means that future

development associated with the draft HENPS could intersect with areas of potential contamination risk, requiring careful ground investigation, risk assessment and management during construction and operation.

Geology

10.1.13. Data from the British Geological Society shows that Heathrow Airport is located to the west of London within the London Basin, and its geology has been shaped by the long-term deposition of sediments associated with the River Thames and its tributaries. The underlying geology beneath the airport is entirely made up of the London Clay Formation. This clay deposit is widespread across Greater London and provides a uniform geological foundation beneath the airport.

10.1.14. The London Clay Formation occurs at shallow depths beneath Heathrow and often extends for more than 50 m. Situated above the London Clay, superficial deposits of river terrace gravels and alluvial deposits are present across the core and extended study areas. The thickness and extent of these deposits vary across the area but are generally between three and six metres in depth. According to a Heathrow water quality and hydro-ecology assessment, these deposits are typically more permeable than the underlying London Clay and have an influence on local groundwater conditions.

10.1.15. The assessment also notes that the combination of clay bedrock overlayed by river deposits have been shaped by the historic mineral extraction and land restoration within the wider Colne Valley and previous construction work at the airport. As a result, ground conditions in and around Heathrow have been subject to detailed investigation to inform existing airport infrastructure and to support future development proposals.

10.2. Future baseline

10.2.1. In the absence of the draft HENPS, baseline conditions for soils around Heathrow are expected to continue to reflect existing land use patterns, including a mix of urban development, airport-related infrastructure, and areas of agricultural land. Parts of the wider Heathrow area contain BMV agricultural land. Future development not linked to the draft HENPS could result in incremental loss of BMV land or other soil resources.

10.2.2. In addition, proposed reforms to national planning policy (particularly the introduction of the ‘Grey Belt’ designation within the revised NPPF) may increase the likelihood that certain lower-performing areas of Green Belt around Heathrow are brought forward for development. While the precise implications for the Heathrow area are uncertain, these reforms could change long-term development pressures on soils within the local Green Belt.

10.2.3. Climate change is expected to place increasing stress on soils in the Heathrow area. Rising temperatures and changes in seasonal rainfall patterns may increase the frequency of drought, waterlogging and localised flooding, with associated impacts on soil moisture, structure and organic matter content. More frequent extreme weather events may elevate the risk of soil erosion, particularly on exposed land or during construction activity. These changes could affect agricultural productivity where farmland persists, and may also influence soil stability, compaction risk and wider environmental processes such as water quality and carbon storage.

11. Water baseline

The water chapter focuses on the core and extended study area (see **Figure 2-2** in the **Scoping Report: Main Body**).

11.1. Current baseline

Water quality

11.1.1. The core and extended study areas are located within the Thames River Basin District, specifically, within the London, Colne, Maidenhead and Sunbury Management Catchments.

11.1.2. Within the London Management Catchment, the study areas are within the Crane Rivers and Lakes Operational Catchment. Within the Colne Management Catchment, the study areas sit within the Colne Operational Catchment. Finally, within the Maidenhead and Sunbury Management Catchments, the study area sits within the Thames Lower Operational Catchment.

11.1.3. The study areas also fall within the following nine Water Framework Directive water body areas:

- Colne (Confluence with Chess to River Thames) Water Body;
- Colne Brook Water Body;
- Crane Water Body;
- Datchet Common Brook;
- Thames (Cookham to Egham);
- Portlane Brook;
- Misbourne;
- Horton Brook Water Body; and
- Surrey Ash Water Body.

11.1.4. All of these water body areas recorded moderate ecological status in the latest survey year (2022). Furthermore, they all failed the latest chemical status assessment (2019), primarily due to the presence of polybrominated diphenyl ethers (PBDE) and Perfluorooctane sulphonate (PFOS). Additional chemical failures were recorded in the Crane Water Body due to the presence of benzo(g,h,i)perylene.

11.1.5. The 2022 River Basin Management Plan (RBMP) for the Thames River Basin District sets out environmental objectives and information to help the development of long-term statutory plans. The plan identifies key pressures to water bodies in this basin such as pollution from sewage and agriculture, over-abstraction, habitat modification and climate change. It includes measures to combat these pressures and reports on progress since 2015.

11.1.6. The core and extended study areas extend across several local authority areas, including: London Borough of Hillingdon; London Borough of Hounslow, London Borough of Richmond upon Thames; London Borough of Ealing; London Borough of Hillingdon; Spelthorne Borough; Three Rivers District; and Slough Borough. Many of the relevant councils have adopted planning policies that are aligned with enhancing and maintaining water quality. Hillingdon council in particular is committed to the positive enhancement of strategic river and canal corridors in line with the RBMP for the Thames River Basin District.

11.1.7. Within the core study area, large sections of Heathrow Airport are comprised of impermeable materials. As a result, surface water runoff has the potential to adversely affect the local water environment. At present, Heathrow operates a managed surface water Pollution Control System designed to store and treat runoff so that discharges comply with permitted limits before entering local watercourses. During winter operations, de-icing of runways, taxiways and aircraft is required. Heathrow's Connecting People and Planet report notes that the Airport works to maximise the recovery of glycol-based de-icers to ensure that they do not infiltrate the local water environment.

11.1.8. Nitrate Vulnerable Zones (NVZs) represent areas at risk from agricultural nitrate pollution, identifying rules in relation to the use of fertilisers and manures as well as a requirement to prevent water pollution from farming areas. While the existing Heathrow site is not located within an NVZ, there are several NVZs within 10 km of the core and extended study areas.

Water resources

Watercourses

11.1.9. In England, watercourses can be designated as 'main rivers'. These are usually larger rivers and streams and are managed by The Environment Agency. The designated main rivers overlapping the core and extended study areas include:

- Fray's River;
- Yeading Brook;

- River Crane;
- Poyle Channel;
- Horton Brook;
- Duke of Northumberland's River;
- Longford River;
- River Colne;
- Colne Brook; and
- Wraysbury River.

11.1.10. Modifications to these watercourses are likely to require additional consents and permits from the relevant Risk Management Authorities.

11.1.11. Rivers that are not designated as main rivers are known as 'ordinary watercourses', and are instead managed by lead local flood authorities, district councils and internal drainage boards. There are many ordinary watercourses within and surrounding the core and extended study area, which are smaller streams, tributaries, and drainage channels that contribute to the local water network. It is also worth noting that the Grand Union Canal is located adjacent to northern parts of the core study area.

11.1.12. There are several lakes located within the core and extended study areas (including lakes in Colne Valley Regional Park, Thorney Country Park, and Harmondsworth Moor). There are also several lakes located in proximity to the core study area, most notably Wraysbury Reservoir, King George VI Reservoir, Stains Reservoir North and South, which are designated as internationally important biodiversity sites (see **Chapter 2** for more detail).

Water supply

11.1.13. In relation to water resources, the existing Heathrow site and the core and extended study areas are served by Affinity Water and Thames Water. The Environment Agency have published a document entitled 'Water Stressed Areas – 2021 classification' which included a map of England, identifying areas of relative water stress. In this regard, the whole of Affinity Water and Thames Water's supply areas are shown as areas of 'Serious' water stress, based upon the amount of water available per person both now and in the future.

11.1.14. Within their Water Resource Management Plans (WRMPs) water companies refer to their Water Resource Zones (WRZs). WRZs are the largest possible zone in which all resources, including external transfers, can be shared and hence the zone in which all customers experience the same risk of supply failure from a resource failure. In this respect, Heathrow Airport falls within the WRZ4 Pinn, which experiences pressures due to population growth, sustainable abstraction, climate change, infrastructure constraints and environmental needs.

Cross-boundary considerations

11.1.15. Water resources and flood risk management extend beyond administrative boundaries. The respective councils for Hillingdon, Hounslow, Richmond upon Thames, Ealing, Buckinghamshire, and Slough are designated as Lead Local Flood Authorities, as such, they play a key role in managing ordinary watercourses and surface water flooding in the study areas.

11.1.16. Furthermore, Thames Water and Affinity water's water supply areas span multiple authorities, and the WRZ4 Pinn faces significant pressures that require coordinated action. Consequently, Heathrow must consider cross-boundary impacts and work collaboratively with Slough and Hillingdon Council's and other stakeholders to ensure sustainable water resource management and flood resilience. This includes alignment with relevant Local Flood Risk Management Strategies and water companies' WRMPs, supporting a catchment-based approach to planning and climate adaptation.

Groundwater

11.1.17. Groundwater plays an important role in the water resource system, contributing to both water supply and ecological health. Heathrow sits upon aquifers, which are vulnerable to pollution, over-abstraction, and changes in infiltration patterns due to urban development.

11.1.18. All development through the draft HENPS must be consistent with the Environment Agency's Approach to Groundwater Protection, which sets out principles for safeguarding groundwater from contamination and unsustainable use. This includes:

- Preventing pollution from hazardous substances and contaminated land;
- Ensuring infiltration-based drainage systems (for example, SuDS) do not compromise groundwater quality or increase flood risk; and
- Conducting site-specific groundwater risk assessments where development may affect aquifers or involve subsurface works.

11.1.19. This also includes careful consideration of works affecting watercourses, including any new or modified culverts, to avoid unnecessary enclosure, alteration of flow regimes or adverse impacts on water quality and ecological function.

11.1.20. Groundwater protection is also important for maintaining long-term water availability, especially in an area identified as being within a seriously water-stressed area. Sustainable water management should therefore include:

- Minimising demand on groundwater through water-efficient design and technologies;
- Protecting recharge zones and avoiding development that could reduce infiltration in appropriate areas; and
- Remediating contaminated sites prior to development to prevent leaching into groundwater.

11.1.21. Drinking Water Safeguard Zones (DWSZ) are areas that have been identified as being 'at risk' of failing the drinking water protection objectives of the Water Environment Regulations 2017. There are two groundwater DWSZs within the northern extent of the extended study area (Tolpits Lane and Eastbury). Additionally, the majority of the core and extended study area to the north, south and west of the existing Heathrow Airport site is currently designated as a surface water DWSZ.

11.1.22. Source Protection Zones (SPZs) are defined by the Environment Agency to protect groundwater sources used for public drinking water, including wells, boreholes and springs. SPZs indicate how vulnerable a groundwater source is to potential contamination, with Zone 1 representing the highest risk (inner protection zone), Zone 2 the outer zone, and Zone 3 the total catchment.

11.1.23. Within the study area, parts of both the core and extended areas fall within SPZs. The northern extent of the extended study area lies within a Zone 1 SPZ, indicating proximity to and rapid travel time toward a public abstraction point. Conversely, the southern extent of the core study area lies within a Zone 3 SPZ, representing the wider groundwater catchment feeding the source.

11.2. Future baseline

11.2.1. Future development has the potential to affect water quality through increased consumption, diffuse pollution, waste-water discharges, water run-off, and modification.

11.2.2. Emerging national planning policy, including proposed changes to the NPPF, places increased emphasis on avoiding the enclosure of existing watercourses unless there are compelling reasons to do so. This reflects the importance of maintaining natural watercourse function, water quality, flood risk management and ecological value.

11.2.3. Affinity Water and Thames Water are likely to maintain adequate water services over the draft HENPS period; therefore, it will be important for new development to avoid negative impacts on water quality, and instead contribute to reducing consumption and improving efficiency.

11.2.4. The requirements of the Water Framework Directive, as transposed into national legislation, will continue to apply in the absence of a draft HENPS. These requirements include the objective of preventing deterioration in the status of water bodies and supporting their progression towards achieving ‘good’ ecological and chemical status or potential, where not already met.

11.2.5. Increased water efficiency in new developments enables growth to be realised without placing additional pressure on water resources. Heathrow is encouraged to incorporate or improve its existing water-efficient technologies, fixtures, and fittings (such as low-flow taps and toilets, rainwater harvesting systems, and greywater recycling).

11.2.6. Climate change is expected to have significant implications for water resources in and around Heathrow, exacerbating existing pressures on both water availability and quality. Rising temperatures and changing rainfall patterns could lead to more frequent droughts, reducing river flows and increasing competition for already scarce water supplies in the area. More intense rainfall events may also result in increased surface water runoff, heightening the risk of pollution in local watercourses.

Part 2: Plans, policies and strategies review

12. Plans, policies and strategies review

12.1.1. This plans, policies, and strategies (PPS) review comprises a review of PPS relevant to the AoS process for the draft HENPS. This is with the aim of informing the aspects the AoS needs to focus on in terms of the legislative and policy context.

12.1.2. The review has been presented through a series of concise summaries which discuss the central objectives of relevant international, national and local/regional PPS.

12.1.3. The following overview presents the international, UK-Wide, English and regional/local PPS of relevance to the draft HENPS AoS process, organised by AoS topic. Accompanying each policy/plan/programme is a summary of the key overarching aims of the document.

12.2. Overarching PPS

Table 12-1: Overarching plans, policies and strategies

Document title	Date	Relevance to the draft HENPS
International		
Espoo Convention on Environmental Impact Assessment in a Transboundary Context	1991	The Espoo Convention (in force since 2007) sets out obligations for Parties, including the UK, to assess the environmental impacts of certain activities at an early stage of planning, and to consult other Parties where projects may have significant transboundary environmental effects. A 2004 amendment introduced the expectation that affected Parties may participate in scoping. The Protocol on Strategic Environmental Assessment (Kiev, 2003) strengthens this framework by requiring assessment of the environmental effects of plans and programmes and promoting extensive public participation. The UK has signed, but not ratified, the Protocol; the EU implements it through the SEA Directive, which is transposed into UK law. The draft HENPS should ensure that environmental impacts of airport expansion are considered early and that any potential transboundary environmental effects (across all environmental topics) are assessed with appropriate consultation in line with established EIA/SEA principles.
UK-Wide		
Environment Act 2021	2021	The Environment Act 2021 provides the framework for long-term environmental governance in the UK. It enables the Secretary of State to set legally binding targets in four priority areas: air quality, water, biodiversity, and resource efficiency and waste reduction. It mandates statutory targets including the PM2.5 concentration limit and a species abundance target to halt the decline in biodiversity by 2030.

Document title	Date	Relevance to the draft HENPS
		The Act also requires the preparation of Environmental Improvement Plans (EIPs), each covering at least a 15-year period, and establishes new environmental governance mechanisms such as the Office for Environmental Protection (OEP). The Act also introduces a mandatory requirement for Biodiversity Net Gain (BNG) for most developments, requiring measurable improvements in biodiversity to be secured relative to a pre-development baseline. It is anticipated that the Environment Act 2021 will be updated from May 2026 to include the need for Nationally Significant Infrastructure Projects (NSIPs) to implement biodiversity net gain, following consultation in 2025. The draft HENPS should ensure that airport expansion proposals are compatible with statutory environmental targets across air quality, biodiversity, water, resource use, and environmental recovery, as set out under the Act.
The Environmental Assessment of Plans and Programmes Regulations 2004	2004	These Regulations transpose the Strategic Environmental Assessment (SEA) Directive into UK law. Where a plan or programme is likely to have significant environmental effects, an SEA is required. This applies across environmental topics including air quality, biodiversity, human health, soil, water, climatic factors, cultural heritage, and landscape. The draft HENPS is subject to these requirements and must ensure that the environmental effects of airport expansion options are assessed transparently and comprehensively across all relevant SEA topics.
Environmental Improvement Plan	2025	The Government's Environmental Improvement Plan 2025 is the statutory plan required under the Environment Act. It sets out updated commitments and measurable actions across all major environmental themes, including air quality, water, thriving wildlife, climate change mitigation and adaptation, reducing environmental hazards, resource efficiency, and access to nature. The 2025

Document title	Date	Relevance to the draft HENPS
		Plan replaces the Environmental Improvement Plan 2023 and provides a revised roadmap for meeting England's long-term Environment Act targets. The draft HENPS should ensure that airport expansion supports delivery of the EIP25 across all topics, including biodiversity recovery, climate resilience, air pollution reduction, resource efficiency, and natural capital enhancement.
Levelling Up & Regeneration Act	2023	The Act sets out a wide programme of planning reform in England, including: • A new role for Local Planning Authorities • Introduction of National Development Management Policies (NDMPs) • Reforms to the Local Plan-making process • Introduction of an environmental outcomes–based approach to environmental assessment These changes affect how environmental, social, and economic considerations are embedded into strategic decision-making. The draft HENPS should reflect these reforms, supporting consistent national policy application and ensuring that environmental outcomes (including those relating to communities, heritage, biodiversity, climate, and landscape) are properly integrated.
Planning and Infrastructure Act 2025	2025	The Act is designed to reduce delays and costs, and accelerate construction and development by removing perceived barriers in the planning process. There are five overarching objectives: • Delivering a faster and more certain consenting process for critical infrastructure • Introducing a more strategic approach to nature recovery • Improving certainty and decision-making in the planning system

Document title	Date	Relevance to the draft HENPS
		• Unlocking land and securing public value for large scale investment • Introducing effective new mechanisms for cross-boundary strategic planning The Act has implications for how environmental considerations, including nature recovery and mitigation, are integrated into strategic decision-making for infrastructure projects. The draft HENPS should reflect the objectives of the Planning and Infrastructure Act 2025 by supporting timely and efficient delivery of airport infrastructure while ensuring that environmental protection, nature recovery and cross-boundary impacts are appropriately considered within the decision-making framework.
Nationally Significant Infrastructure: Action plan for reforms to the planning process	2023	This Action Plan sets out a series of reforms to improve the NSIP consenting regime, including: • Clear strategic direction through updated NPSs • Operational reforms for faster and more proportionate examinations • Improved environmental outcomes, including the move toward Environmental Outcomes Reports • Strengthened engagement of local authorities and communities • Improved system capacity and capability The Action Plan provides contextual background on the evolving approach to consenting nationally significant infrastructure, including expectations around proportionality, engagement and environmental outcomes, which is relevant to the methodological approach taken by the AoS. The draft HENPS should have regard to these reforms insofar as they support a clear, proportionate and robust policy framework, while ensuring that environmental assessment remains comprehensive and effective.

Document title	Date	Relevance to the draft HENPS
Planning Act 2008	2008	The Planning Act 2008 establishes the framework for Nationally Significant Infrastructure Projects (NSIPs) and creates the system of National Policy Statements. NPSs must address: • Contribution to sustainable development • Integration with wider Government policies • Capacity and demand • Safety and technology considerations • Managing adverse impacts • Identifying locations where appropriate These requirements extend across all environmental topics, including air quality, biodiversity, heritage, landscape, water, noise, carbon, and socio-economic factors. The draft HENPS must therefore comply with the Act and provide clear policy direction for airport expansion as an NSIP.
Aviation Policy Framework (APF)	2013	The APF sets the Government's overarching policy for aviation, supporting the sector's economic role while addressing environmental and community impacts. It establishes expectations for airport operations, airspace management, local engagement, and minimisation of adverse environmental effects, and provides the baseline policy context for national aviation planning. The draft HENPS should reflect the APF's strategic objectives when setting national policy for future airport development, including principles relating to growth, environmental performance, and engagement with communities.
UK Air Navigation Guidance	2023	The UK Air Navigation Guidance provides direction from the Secretary of State to the Civil Aviation Authority (CAA) on carrying out its air navigation functions, including expectations relating to

Document title	Date	Relevance to the draft HENPS
		environmental considerations, airspace design, consultation requirements and regulatory decision-making. The 2023 update incorporates changes related to airspace modernisation and environmental integration. The draft HENPS should ensure that any expansion-related airspace implications remain consistent with the principles and regulatory expectations set out in the Air Navigation Guidance.
Airspace Modernisation Strategy	2018 (ongoing)	The Airspace Modernisation Strategy is the national framework for redesigning UK airspace to improve efficiency, resilience, integration of new airspace users and environmental performance. It sets long-term objectives and delivery steps required of airports, National Air Traffic Service (NATS) and the CAA as co-sponsors. The draft HENPS should ensure that any airport expansion proposals are compatible with ongoing airspace modernisation work and future airspace architecture.
English		
National Planning Policy Framework (NPPF)	2024	The NPPF sets out the overarching planning policy for England, including principles relating to: • Sustainable development • Climate change mitigation and adaptation • Local environmental protection • Heritage conservation • Community well-being • Transport and connectivity

Document title	Date	Relevance to the draft HENPS
		• Effective use of land and landscape protection • High-quality design and the creation of well-designed places The NPPF is supported by Planning Practice Guidance, including guidance on air quality and Environmental Impact Assessment, which informs how environmental matters should be addressed in planning decisions. The draft HENPS should take account of the NPPF to ensure that airport expansion aligns with national planning principles across environment, communities, economy, transport, heritage and climate. It is recognised that the UK Government is revising the NPPF; consultation is running on these planning reforms until 10th March 2026.
The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018	2018	These Regulations amend the 2017 EIA Regulations to ensure clarity and coherence in EIA processes for NSIPs. They ensure that environmental considerations (including biodiversity, population and health, water, soil, climate, cultural heritage, landscapes, and air quality) are integrated with development proposals. The draft HENPS should ensure that airport expansion proposals comply fully with EIA requirements and that impacts across all relevant environmental topics are robustly assessed.
Regional & Local		
London Environment Strategy	2018	The Mayor of London's London Environment Strategy is London's first integrated environmental strategy. It sets policies across air quality, green infrastructure, climate change mitigation and adaptation, waste, ambient noise, and the circular economy. The Strategy identifies toxic air as

Document title	Date	Relevance to the draft HENPS
		one of London's most significant environmental challenges and establishes actions to reduce emissions from transport and other sources. It also integrates policy across environment, health, noise, green spaces, climate, and waste. The draft HENPS should consider the strategic environmental context set by the London Environment Strategy, particularly in relation to the Mayor's objectives for air quality, climate resilience, noise reduction, and protection of vulnerable communities.
The London Plan	2021	The London Plan is the statutory spatial development strategy for Greater London. It sets out strategic policies across housing, economy, transport, climate change, the environment, design, infrastructure, heritage, and spatial development. Key themes include sustainable growth, good design, protection of the natural and historic environment, carbon reduction, circular economy principles, green infrastructure, and improving health and well-being. The draft HENPS should note that the London Plan provides the wider spatial and environmental context for Heathrow, including policy directions on growth, land use, climate, health, transport, green infrastructure, and environmental protection, which are relevant to multiple AoS topics.
Environmental Permitting Guidance and London Plan Waste Policy (including Policy SI 8)		Environmental permitting guidance and London Plan Policy SI 8 set requirements for the management of waste facilities, including controls to minimise emissions to air and impacts on local amenity. In London, this includes expectations that certain waste operations, such as waste transfer activities, are enclosed within buildings to reduce dust, odour and pollutant emissions. The draft HENPS should ensure that airport-related development has regard to strategic waste and air quality objectives, with waste management activities designed to minimise emissions and adverse effects on communities and the environment.

Document title	Date	Relevance to the draft HENPS
Local Plans	Various	Local Plans prepared by authorities around Heathrow set out locally specific policies on matters including land use, biodiversity, green infrastructure, air quality, noise, transport, climate resilience, heritage, flood risk, water quality and community wellbeing. Although the draft HENPS is a national policy document, airport-related expansion options at Heathrow may interact with local growth objectives and associated environmental constraints, particularly through land take, surface access, air quality, noise, and community or ecological impacts. Relevant local plans include, but are not limited to: London Borough of Hillingdon; London Borough of Hounslow; London Borough of Ealing; Slough Borough; Buckinghamshire district; Windsor and Maidenhead Borough; Spelthorne District; and Runnymede District.

12.3. Air Quality

Table 12-2: Plans, policies and programmes related to the air quality AoS topic

Document title	Date	Relevance to the draft HENPS
International		
UNECE Convention on Long-Range Transboundary Air Pollution (CLRTAP) and the Gothenburg Protocol 1979 / 1999 (as amended 2012 and under revision 2023–2026)	1979 / 1999	The Convention on Long-Range Transboundary Air Pollution (CLRTAP) provides the international framework for reducing transboundary air pollution across Europe and North America. Its Gothenburg Protocol sets national emission reduction commitments for NOx, SO2, NMVOCs, NH3 and PM2.5, which the UK reports against annually. The Protocol is currently being updated to further strengthen commitments, including addressing black carbon and methane. The draft HENPS should ensure that airport expansion does not compromise the UK's national emission reduction commitments under CLRTAP/Gothenburg.
Ambient Air Quality and Cleaner Air for Europe Directive (2008/50/EC)	2008	The Ambient Air Quality and Cleaner Air for Europe Directive (2008/50/EC) establishes limit values, target values and assessment requirements for key ambient air pollutants, with the objective of protecting human health and the environment. Although the UK is no longer bound by EU law, the requirements of the Directive have been retained in domestic legislation and continue to underpin the UK's statutory air quality objectives and assessment framework. The draft HENPS should ensure that airport-related development supports continued compliance with UK air quality limit values derived from the Ambient Air Quality Directive and does not undermine efforts to improve local air quality, particularly in areas already experiencing exceedances.

WHO Global Air Quality Guidelines	2021	The World Health Organization (WHO) Global Air Quality Guidelines provide science-based recommendations on ambient concentrations of key air pollutants, including PM2.5, PM10, NO2, SO2, O3 and CO, aimed at protecting human health. The Guidelines are not legally binding, but they represent an internationally recognised public-health benchmark and are increasingly used to inform national policy development and assessment of health risks associated with air pollution. The UK Government has committed to progressively improving air quality, and alignment with the WHO Guidelines may become more relevant over the lifetime of the draft HENPS. The draft HENPS should have regard to the WHO Global Air Quality Guidelines as a contextual benchmark, alongside statutory UK air quality objectives, when assessing the potential air quality and health effects of airport-related development.
UK-Wide		
Air Quality Standards Regulation	2010	The Air Quality Standards Regulations 2010 establish legally binding limit values and target values for key air pollutants in ambient air across the UK, including nitrogen dioxide (NO2), particulate matter (PM10 and PM2.5), ozone, sulphur dioxide and carbon monoxide. The draft HENPS should ensure that an expansion is in compliance with statutory air quality limit values, meaning that options, mitigation measures, and surface access strategies must collectively avoid causing or worsening breaches of the Air Quality Standards Regulations 2010.
Clean Air Strategy 2019	2019	The Clean Air Strategy sets out how the UK Government plans to tackle all sources of air pollution and outlines a policy framework to drive reductions in harmful emissions, including those from transport. It integrates and reinforces a range of national policies and targets aimed at improving air quality. The Strategy's priorities include: • Protecting public health

		• Protecting the environment • Securing clean growth and innovation • Reducing emissions from transport, homes, farming, and industry • Leadership across all levels of Government It emphasises the role of robust local Air Quality Strategies and national initiatives to support emission reduction. The draft HENPS should ensure that proposals for airport expansion align with the Clean Air Strategy, particularly regarding minimising transport emissions and supporting national air quality improvements.
The Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations 2019	2019	These regulations retain legally binding limits for concentrations of major outdoor pollutants such as PM10, PM2.5 and NO2 following the UK's exit from the EU. They also incorporate the 4th Air Quality Daughter Directive dealing with heavy metals and polycyclic aromatic hydrocarbons in ambient air. The draft HENPS should ensure that airport expansion proposals comply fully with retained air quality limit values and targets contained in this legislation.
Air Pollution: Action in a Changing Climate	2010	The Air Pollution: Action in a Changing Climate strategy sets out the Government's approach to managing the interactions between air quality and climate change. It recognises that many sources of air pollutants and greenhouse gases are shared, and that coordinated action can deliver co-benefits for both air quality improvement and climate change mitigation, while unmanaged trade-offs could undermine progress in either area. The strategy emphasises the importance of integrated policy making across transport, energy, land use and industrial sectors, and highlights the need to consider how climate change may influence air pollutant concentrations and population exposure over time.

		The draft HENPS should ensure that airport-related development reflects an integrated approach to air quality and climate change, maximising opportunities for co-benefits and avoiding measures that could adversely affect air quality or climate outcomes over the lifetime of the policy.
National Emission Ceilings Regulations (NECR) 2018	2018	The NECR sets legally binding UK-wide emission reduction commitments for NOx, SO2, NMVOCs, NH3 and PM2.5 for the periods 2020-2029 and from 2030 onwards. These commitments align with the UK's obligations under the Gothenburg Protocol. Aviation-related emissions from domestic civil aviation and the landing and take-off cycle are included in national emission inventories submitted under the NECR. The draft HENPS should ensure that airport expansion does not jeopardise progress toward national emission reduction commitments under the NECR.
Environmental Protection Act 1990	1990	This Act introduces a system of integrated pollution control for the disposal of waste to land, water and air. It is divided into three parts: • Part I – establishes integrated pollution control and gives local authorities powers to control air pollution from a range of prescribed processes. • Part II – improves rules governing waste disposal. • Part III – covers statutory nuisances and clean air. The draft HENPS should ensure that proposals for airport expansion comply with the Environmental Protection Act, particularly in relation to air pollution control and the management of statutory nuisances.
English		
The Environmental	2023	These Regulations set a legally binding target for annual mean PM2.5 concentrations:

Targets (Fine Particulate Matter) (England) Regulations 2023		• By 2040, the annual mean PM2.5 level at all relevant monitoring stations must be 10 µg/m³ or lower (rounded to the nearest whole µg/m³). The draft HENPS should ensure that airport expansion proposals are compatible with the statutory PM2.5 target for 2040.
Air Quality Strategy for England 2023 And the Framework for Local Authority Delivery	2023	The Air Quality Strategy for England sets out the Government's approach to improving air quality and reducing exposure to air pollution, with a focus on protecting public health, improving quality of life, and reducing environmental harm. The Strategy builds on existing statutory air quality objectives and introduces strengthened ambitions, including action across transport, industry, agriculture and place-based interventions, alongside a greater emphasis on health outcomes and environmental justice. The draft HENPS should ensure that airport-related development supports the objectives and ambitions of the Air Quality Strategy for England, contributes to long-term improvements in air quality, and does not hinder progress towards reducing population exposure to air pollution.
The Environmental Permitting (England and Wales) Regulations 2016	2016	Regulates activities such as waste operations, discharges, emissions and industrial processes. The draft HENPS should ensure that airport-related development secures relevant permits and adheres to environmental standards.
The Smoke Control Areas (Authorised Fuels) England (No. 2) Regulations 2014	2014	These Regulations list fuels that may be legally used in smoke control areas, including: • Anthracite • Semi-anthracite • Electricity • Gas

		• Low volatile steam coals • Fuels listed in the Schedule Their purpose is to improve air quality by controlling smoke emissions. The draft HENPS should ensure that airport-related development complies with smoke control requirements where applicable.
Regional & Local		
Mayor's Transport Strategy	2018	Transport for London (TfL) implements a range of measures that directly affect air quality in the Heathrow area. These include: • the Ultra Low Emission Zone (ULEZ) • taxi and private-hire vehicle emissions controls • freight emissions reduction programmes • expansion of zero-emission buses and supporting infrastructure • promotion of walking and cycling to reduce vehicle emissions • support for the Mayor's ambition to achieve a zero-emission transport system over time These measures aim to reduce emissions of NOx, PM, and other harmful pollutants from London's transport network. The draft HENPS should consider that airport-related surface access interacts with London's transport-driven air quality policies, particularly as these measures determine the emissions baseline around Heathrow.
Local Air Quality Management	Ongoing (introduced	The Local Air Quality Management (LAQM) Framework provides the statutory system through which local authorities in England are required to assess and manage local air quality. Under

(LAQM) Framework	in 1997, updated guidance)	the framework, local authorities must review and assess air quality against national objectives, designate Air Quality Management Areas (AQMAs) where objectives are not met, and prepare Air Quality Action Plans to work towards compliance. The LAQM Framework emphasises the importance of addressing emissions from transport, development and other local sources, and of integrating air quality considerations into land-use planning, transport planning and public health decision-making. The draft HENPS should ensure that airport-related development supports the effective operation of the LAQM Framework, does not exacerbate existing air quality exceedances or undermine Air Quality Action Plans, and assists local authorities in progressing towards compliance with national air quality objectives.
Air Quality Action Plans (AQAPs)	Various	Under the Local Air Quality Management (LAQM) framework, all UK local authorities must review air quality, declare Air Quality Management Areas where national objectives are at risk, and produce Air Quality Action Plans (AQAPs) setting out measures to reduce pollution. Boroughs around Heathrow (including Hillingdon and Hounslow) have AQMAs affected by emissions from road traffic and airport-related sources. Their AQAPs typically include measures on transport emissions, planning controls, NRMM enforcement, and localised exposure reduction. The draft HENPS should note that Heathrow sits within an area covered by multiple AQAPs and ensure that airport expansion does not hinder local authorities' statutory duties to improve air quality.
Non-Road Mobile Machinery (NRMM) - GLA NRMM Emission Standards	Ongoing (introduced 2015, updated)	Non-Road Mobile Machinery (NRMM), including construction plant and equipment, is a recognised source of emissions of nitrogen oxides (NOx) and particulate matter, particularly during building and infrastructure construction. In London, the Greater London Authority (GLA) has established NRMM emission standards requiring the use of cleaner engine technology for construction, demolition and associated activities, with minimum emission standards based on EU engine stages and controls on particulate emissions.

	The GLA NRMM standards promote the adoption of low-emission and ultra-low-emission construction plant, the retrofitting or replacement of older machinery, and effective emissions management through monitoring and compliance. These standards are particularly relevant in areas of existing air quality exceedance and high population exposure. The draft HENPS should ensure that airport-related construction and enabling works adopt the principles of clean engine technology for non-road mobile machinery, are compatible with relevant NRMM emission standards, and minimise air quality impacts during construction, particularly in densely populated or AQMAs.

12.4. Biodiversity

Table 12-3: Plans, policies and programmes related to the biodiversity AoS topic

Document title	Date	Relevance to the draft HENPS
International		
Bern Convention on the Conservation of European Wildlife and Natural Habitats	1982	The principal aims of the Convention are to ensure conservation and protection of wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention); to increase cooperation between contracting parties; and to regulate the exploitation of those species (including migratory species) listed in Appendix III. The Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1,000 wild animal species. It is through the Wildlife and Countryside Act (1981 as amended) that the convention has been transposed into UK law. The draft HENPS should ensure that airport-related development, including any expansion at Heathrow and associated surface access improvements, does not harm species or habitats protected under the Bern Convention.
Bonn Convention	1983	The Convention on the Conservation of Migratory Species of Wild Animals (CMS) is an international agreement that aims to conserve migratory species across their ranges. It recognises the need for coordinated international action to protect migratory wildlife and their habitats. Article 2 sets out key principles, including the need to conserve migratory species, particularly those with an unfavourable conservation status. Parties shall endeavour to provide immediate protection for Appendix I species and to develop agreements for Appendix II species. The draft HENPS should ensure that airport expansion does not adversely affect migratory species, including through habitat loss, collision risk, and disturbance from noise, lighting or operational activities.

Document title	Date	Relevance to the draft HENPS
Convention on Biological Diversity	2010	This Convention establishes a global plan to protect biodiversity and sets out a framework for the fair and equitable sharing of the benefits of genetic resources. Its 2050 vision is for biodiversity to be valued, conserved, restored and wisely used, maintaining ecosystem services and supporting a healthy planet. The draft HENPS should ensure that airport expansion supports the objectives of biodiversity conservation and contributes to the protection, restoration and enhancement of biodiversity in line with the Convention.
Kunming-Montreal Global Biodiversity Framework (GBF)	2023	The GBF provides an ambitious plan to halt and reverse global biodiversity loss by 2030 and achieve a 2050 vision of living in harmony with nature. It builds on lessons from the Strategic Plan for Biodiversity 2011–2020 and sets out four long-term goals and 23 global targets. Goals include restoring ecosystems, preventing species extinction, ensuring sustainable use of biodiversity, equitable sharing of benefits from genetic resources, and securing adequate financial and technical capacity to deliver biodiversity outcomes. The draft HENPS should reflect the GBF's emphasis on halting biodiversity loss and enhancing ecosystems by ensuring that airport expansion avoids harm, delivers biodiversity enhancements, and supports ecosystem restoration where possible.
The Ramsar Convention on Wetlands	1971	The Ramsar Convention focuses on the conservation and wise use of wetlands. Its three main pillars are: • the designation of Ramsar Sites (wetlands of international importance); • the wise use of all wetlands; and • international cooperation on wetland conservation.

Document title	Date	Relevance to the draft HENPS
		The draft HENPS should ensure that airport expansion does not adversely affect Ramsar Sites or other wetland areas, including through land take, hydrological changes, pollution or disturbance.
UK-Wide		
The Conservation of Habitats and Species Regulations 2017	2017	These Regulations transpose the EU Habitats Directive (92/43/EEC) into UK law. They protect European Protected Species (EPS), including the otter, dormouse and all bats, and provide the framework for designating and protecting European sites (SACs and SPAs). Section 43 provides protection for EPS listed on Schedule 2, including offences relating to damage, disturbance or capture. The Regulations also include licensing provisions for activities that may affect EPS or European sites. The draft HENPS should ensure that airport-related development avoids impacts on European sites and EPS, and that any unavoidable effects are managed in accordance with the Regulations, including through licensing where required.
Countryside and Rights of Way Act	2000	This Act contains five Parts and 16 Schedules and provides for public access on foot to certain types of land, amends the law relating to public rights of way, increases measures for the management and protection of Sites of Special Scientific Interest (SSSIs), strengthens wildlife enforcement legislation, and provides for better management of Areas of Outstanding Natural Beauty (AONB) (now referred to as 'National Landscapes'). The Act is compliant with the provisions of the European Convention on Human Rights, requiring consultation where the rights of the individual may be affected. The draft HENPS should ensure that airport-related development adheres to the provisions of this Act.
The Economics of Biodiversity:	2021	Headline messages from the review include: • Humanity is part of nature, not separate from it.

Document title	Date	Relevance to the draft HENPS
The Dasgupta Review		• Global demands on nature exceed its ability to supply essential services. • This unsustainable relationship threatens the prosperity of current and future generations. • The root cause is deep-seated institutional failure. • Economies are embedded within nature. • A fundamental shift in how value, progress and decision-making are approached is required. The draft HENPS should ensure that airport-related development aligns with the principles and insights set out in the Dasgupta Review.
The Great Britain Invasive Non-native Species Strategy	2023	Invasive non-native species are a major driver of biodiversity loss. This strategy outlines collaborative aims for government, NGOs, researchers, businesses, and the public to guide coordinated action to 2030. The draft HENPS should ensure that airport-related development is consistent with this strategy, including preventing the introduction or spread of invasive species.
Independent Assessment of UK Climate Change Risk	2021	This assessment provides statutory advice on climate risks and priorities for national adaptation planning. It identifies over 60 risks and opportunities across the natural environment, infrastructure, health, homes and the economy. Eight priority risk areas requiring urgent action are also identified. The draft HENPS should ensure that airport-related development takes account of the relevant climate-related environmental risks identified in this assessment.
National Environment and Rural	2006	This Act established Natural England and set out responsibilities relating to nature conservation, wildlife, SSSIs, National Parks, rights of way and inland waterways. It also reconstituted the Joint Nature Conservation Committee.

Document title	Date	Relevance to the draft HENPS
Communities Act 2006		The draft HENPS should ensure that airport-related development aligns with this Act and supports the statutory purpose of conserving and enhancing England's natural environment.
National Pollinator Strategy	2014	The Strategy sets out the 2014-2024 approach for supporting pollinator populations and reversing declines to secure their role in pollinating crops, native plants and ecosystems. The draft HENPS should ensure that airport-related development supports the aims of this strategy, including through habitat protection and enhancement.
Planning Practice Guidance – Natural Environment	2025	Explains key issues in implementing policy to protect and enhance the natural environment. The draft HENPS should ensure that airport-related development is consistent with this guidance.
River Basin Management Plans	2022	These plans set out how organisations and communities will work together to protect and improve the water environment across whole river systems, including rivers, lakes, groundwater, estuaries and coastal waters. The draft HENPS should ensure that airport-related development is consistent with the relevant River Basin Management Plans.
Wildlife and Countryside Act 1981	1981	This Act provides protection for wild species, regulates methods of killing and taking animals, restricts the introduction of certain species, and strengthens nature conservation and rights of way legislation. The draft HENPS should ensure that airport-related development adheres to the requirements of this Act.

Document title	Date	Relevance to the draft HENPS
UK National Biodiversity Strategy and Action Plan (NBSAP)	2025	The NBSAP sets out how the UK will deliver all 23 targets of the Kunming–Montreal Global Biodiversity Framework by 2030, coordinating action across the four nations and the UK Overseas Territories and Crown Dependencies. It supersedes the former UK Post-2010 Biodiversity Framework and builds on earlier commitments, including those reflected in the Environmental Improvement Plan. The draft HENPS should ensure that airport-related development aligns with the NBSAP and supports UK efforts to halt and reverse biodiversity loss.
English		
DEFRA Policy Paper: Changes to the Habitat Regulations 2017	2021	This paper explains amendments made to the Conservation of Habitats and Species Regulations 2017 via the 2019 EU Exit Regulations. The Regulations transpose the Habitats Directive and elements of the Wild Birds Directive in England and Wales, including inshore waters up to 12 nm. The draft HENPS should ensure that airport-related development adheres to the updated policy framework.
The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019	2019	This consolidates amendments to the 1994 Habitats Regulations for England and Wales. It provides for the designation and protection of European sites, protection of European protected species, and adaptation of planning and other controls for their protection. Competent authorities must have regard to the Habitats Directive when exercising their functions. The draft HENPS should ensure that airport-related development adheres to these Regulations.

Document title	Date	Relevance to the draft HENPS
Delivering 30 by 30 on land in England	2020	The UK committed in 2020 to protect 30% of UK land by 2030. England's existing protected areas cover 26%, with an additional 4% (over 400,000 ha) required. Delivery will involve partnership between Government, devolved administrations, landowners and civil society, supported by programmes such as the Nature for Climate Fund and Environmental Land Management schemes. The draft HENPS should ensure that airport-related development supports this programme and does not hinder progress toward the 30x30 commitment.
England Trees Action Plan 2021 to 2024	2021	This plan sets out priorities for: • Nature recovery: improving and expanding woodland habitats, including ancient woodland; • A thriving forest economy: increasing demand for UK-grown timber and encouraging green finance; • Trees for water and soil: using tree planting to support water quality, flood management and soil protection; • Trees for people: improving access to woodland and enhancing urban tree cover; • Heritage and landscape: protecting historic landscapes and ensuring appropriate woodland management; • Trees outside woodland: supporting hedgerows, wood pastures, and scattered trees; • Resilience: reducing risks from pests, diseases, and climate change. The draft HENPS should ensure that airport-related development aligns with the principles and objectives of this plan.
Environmental Damage (Prevention and	2015	These Regulations require operators of certain activities to prevent and remediate environmental damage affecting protected species, habitats, SSSIs, water or land.

Document title	Date	Relevance to the draft HENPS
Remediation) (England) Regulations 2015 as amended by The Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019		The draft HENPS should ensure that airport-related development adheres to these Regulations.
The Environmental Targets (Biodiversity) (England) Regulations 2022	2022	These Regulations establish legally binding long-term biodiversity targets under the Environment Act 2021, including species abundance and habitat condition targets. The draft HENPS should ensure that airport-related development aligns with these biodiversity targets.
The Environmental Targets (Woodland and Trees Outside Woodland)	2023	These Regulations set a long-term target for woodland and tree cover in England: • at least 16.5% of land covered by woodland and trees outside woodland by 2050, assessed by the Forestry Commission. The draft HENPS should ensure that airport-related development adheres to this target where relevant.

Document title	Date	Relevance to the draft HENPS
(England) Regulations 2023		
Government Forestry and Woodlands Policy Statement	2013	This statement establishes priorities for the forestry sector: • Protecting forests from pests, diseases and climate impacts; • Improving resilience and maximising economic, environmental and social benefits; • Expanding woodland cover. The draft HENPS should ensure that airport-related development adheres to this policy.
Green Infrastructure Standards	2023	Part of the Green Infrastructure Framework, the Standards define the quality and quantity of green infrastructure required to deliver climate adaptation, net zero and wellbeing benefits. The five headline standards cover: • GI strategy; • accessible greenspace; • urban nature recovery; • urban greening factor; • urban tree canopy cover. The draft HENPS should ensure that airport-related development aligns with these standards.
The Invasive Alien Species (Enforcement	2019	This Order enforces EU Regulation 1143/2014 in England and Wales, designed to prevent, minimise or mitigate impacts from invasive alien species.

Document title	Date	Relevance to the draft HENPS
and Permitting) Order 2019		The draft HENPS should ensure that airport-related development adheres to this Order.
Natural Environment and Rural Communities Act 2006	2006	Section 40 places a duty on all public bodies to have regard to the conservation of biodiversity in exercising their functions. The duty aims to embed biodiversity into all public decision-making. The draft HENPS should ensure that airport-related development adheres to this duty.
The Nature Recovery Network	2020	A major commitment in the 25 Year Environment Plan, the NRN aims to: • enhance protected sites; • create or restore 500,000 ha of wildlife-rich habitat; • improve ecological connectivity; • recover threatened species; • increase woodland cover; • deliver wider benefits including carbon sequestration, clean water, flood management and recreation. The draft HENPS should ensure that airport-related development aligns with the NRN and contributes positively to nature recovery where possible.
Regional & Local		

Document title	Date	Relevance to the draft HENPS
Thames Basin Catchment Management / River Basin-related local strategies	Various	Local strategies supplement the statutory River Basin Management Plans with finer-grain flood-risk, water-quality and ecological management relevant to the Heathrow area. The draft HENPS should ensure that Heathrow options do not adversely affect local hydrology, water quality or habitats.
London Local Nature Recovery Strategy	2026	Local nature recovery strategies agree priorities for nature recovery and propose actions in the locations where it would make a particular contribution to achieving those priorities. There are 48 strategy areas that cover the whole of England; Heathrow Airport is located within the Greater London area, and the relevant strategy is the London Local Nature Recovery Strategy.

12.5. Climate change (mitigation)

Table 12-4: Plans, policies and programmes related to the climate change (mitigation) AoS topic

Document title	Date	Relevance to the draft HENPS
International		
UN Framework Convention on Climate Change (Kyoto Protocol, Paris Agreement etc.)	Various	These agreements set the global framework for reducing greenhouse gas emissions and for achieving long-term temperature goals. The UK must contribute to international mitigation efforts through legally binding international commitments. The draft HENPS should ensure Heathrow options support the UK's contribution to international climate obligations.
Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)	-	CORSIA is ICAO's global market-based measure designed to stabilise net CO2 emissions from international aviation at 2020 levels, with airlines required to offset growth above this baseline depending on the phase and participating states. The draft HENPS should ensure that aviation activity associated with Heathrow expansion is compatible with how the UK implements CORSIA.
UK-Wide		
The Climate Change Act 2008 (2050 Target Amendment) Order 2019	2019	The Act provides the statutory basis for UK climate policy, including: • A legally binding target of net-zero greenhouse gas emissions by 2050. • A system of five-year carbon budgets. • Establishment of the Climate Change Committee.

Document title	Date	Relevance to the draft HENPS
		• Requirements for regular Climate Change Risk Assessments and National Adaptation Programmes. The draft HENPS should ensure Heathrow-related carbon emissions are compatible with the UK's legislated carbon budgets and net-zero target.
Net Zero Strategy: Build Back Greener	2021	This strategy sets out the government's policies and proposals for decarbonising all sectors of the UK economy to meet the 2050 net-zero target, including the pathway for transport decarbonisation and the role of low-carbon fuels, hydrogen, CCUS, and greenhouse gas removals. The draft HENPS should ensure that aviation growth enabled by Heathrow expansion aligns with the strategic pathway for meeting the UK's net-zero goals.
Carbon Budgets (including Carbon Budget 6 to 2037)	2020	Carbon budgets place limits on the UK's total greenhouse gas emissions across set periods. The Climate Change Committee recommends including international aviation and shipping within the Sixth Carbon Budget. The draft HENPS should take account of Heathrow expansion's potential contribution to national emissions and its compatibility with carbon budget constraints.
Powering Up Britain: Net Zero Growth Plan (2023)		This plan updates the Net Zero Strategy and sets out measures across sectors to meet carbon budgets, including aviation-related decarbonisation through sustainable fuels and technology development. The draft HENPS should reflect the strengthened requirements on sectors (including aviation) to deliver emissions reductions consistent with statutory obligations.
Jet Zero Strategy (2022)		This is the UK Government's dedicated strategy for achieving net-zero aviation by 2050. It includes commitments on:

Document title	Date	Relevance to the draft HENPS
		• Improving aircraft fuel efficiency. • Scaling up sustainable aviation fuels (SAF). • Supporting zero-emission aircraft. • Modernising UK airspace. • Introducing a carbon price for aviation. The draft HENPS should align with the Jet Zero Strategy and ensure that any increase in capacity at Heathrow is compatible with the delivery of net-zero aviation.
Aviation Strategy / Flightpath to the Future (2022)		Flightpath to the Future is the UK Government's medium-term strategic framework for the aviation sector. It sets out a 10-point plan for supporting a modern, innovative, and sustainable aviation industry over the next decade. Published by the Department for Transport, the framework includes commitments to: • Recover and sustainably grow the aviation sector following the pandemic. • Enhance the UK's global aviation impact and leadership. • Support growth in airport capacity where justified, ensuring capacity is used in a way that delivers benefits for the UK. • Put the sector on course to achieve Jet Zero through innovation, decarbonisation measures, and technology development. • Improve consumer experience, strengthen workforce skills, and unlock local economic benefits. The draft HENPS should ensure that any Heathrow airport expansion options align with the Government's strategic approach to sustainable sector growth and aviation decarbonisation.

Document title	Date	Relevance to the draft HENPS
Airspace Modernisation Strategy 2023–2040 (CAA)	2023	The Airspace Modernisation Strategy sets out the CAA's long-term plan for redesigning and updating UK airspace to make aircraft operations more efficient. More direct, higher-precision flightpaths and modernised navigation systems reduce fuel burn and therefore carbon emissions. Modernisation is identified as a key national programme intended to deliver 'quicker… and environmentally cleaner journeys'. The draft HENPS should ensure Heathrow expansion is compatible with airspace changes that enable carbon-efficient operations.
SAF Mandate Policy	2024	Introduces requirements for a minimum proportion of sustainable aviation fuels in the UK aviation fuel mix, with increasing targets over time. The draft HENPS should take account of the role of SAF in mitigating carbon emissions from operations at an expanded Heathrow.
Clean Growth Strategy	2017	This strategy sets out how the UK aims to grow the economy while reducing emissions, including major commitments for the transport sector such as uptake of low-carbon vehicles and fuels. The draft HENPS should support the principle of clean growth by ensuring that airport-related carbon impacts do not hinder progress towards transport sector decarbonisation.
Decarbonising Transport: A Better, Greener Britain	2021	The plan outlines the pathway for decarbonising all transport modes, including aviation, with measures on alternative fuels, technology development, efficiency improvements, and increased use of low-carbon energy. The draft HENPS should ensure Heathrow-related aviation emissions are consistent with the national plan for decarbonising transport.

Document title	Date	Relevance to the draft HENPS
Industrial Decarbonisation Strategy	2021	Sets out how industry can reach net-zero while maintaining competitiveness, including building supply chains for hydrogen, CCUS, and low-carbon fuels. The draft HENPS should recognise the dependency of future aviation decarbonisation on industrial decarbonisation pathways such as hydrogen and CCUS.
UK Infrastructure: A 10 Year Strategy	2025	This strategy outlines long-term infrastructure goals to support economic recovery, net-zero emissions, and climate resilience. The draft HENPS should ensure Heathrow expansion supports national infrastructure goals for a low-carbon, climate-resilient transport system.
National Infrastructure Assessment	2018	Offers long-term recommendations for UK infrastructure needs, including decarbonising transport networks and reducing emissions. The draft HENPS should reflect relevant national recommendations for long-term low-carbon transport infrastructure.
Net Zero Innovation Portfolio	2021	A government programme supporting research and development into low-carbon technologies including hydrogen, CCUS, direct air capture, and energy system innovation. The draft HENPS should acknowledge the contribution of emerging technologies supported by this portfolio to long-term aviation decarbonisation.
The Ten Point Plan for a Green Industrial Revolution	2020	Sets out cross-sector actions to reduce emissions, including investment in low-carbon fuels, hydrogen, CCUS, and clean transport. The draft HENPS should ensure alignment with the broader programme of UK decarbonisation actions relevant to aviation.

English

Document title	Date	Relevance to the draft HENPS
Planning Practice Guidance – Climate Change	2019	Advises on how planning can address climate mitigation and adaptation through plan-making and development management. The draft HENPS should ensure that airport infrastructure and operations incorporate climate mitigation and resilience measures.
Regional & Local		
Local Authority Climate Action Plans	Various	Local authorities surrounding Heathrow have adopted Climate Emergency declarations and published climate action or net-zero plans. These set out area-wide commitments to reduce greenhouse gas emissions, promote sustainable and active travel, enhance energy efficiency, and support local low-carbon initiatives.

12.6. Climate change (adaptation)

Table 12-5: Plans, policies and programmes related to the climate change (adaptation) AoS topic

Document title	Date	Relevance to the draft HENPS
UK-Wide		
The Climate Change Act 2008 (2050 Target Amendment) Order 2019	2019	This legislation establishes the UK's statutory framework for addressing climate change, including a requirement for the Government to assess climate risks every five years and publish a National Adaptation Programme. It places duties on Government to plan for climate impacts affecting infrastructure, communities, and the economy. The draft HENPS should ensure airport-related development supports the UK's statutory adaptation objectives and reflects assessed climate risks.
Design Principles for National Infrastructure	2020	These principles, published by the National Infrastructure Commission, set out best-practice expectations for resilience, adaptability, sustainability, and long-term environmental integration in major infrastructure design. They aim to ensure that nationally significant infrastructure is planned to cope with future climatic, environmental and operational pressures. The draft HENPS should ensure airport development follows these design principles, embedding resilience to future climate impacts.
Flood Risk Management Plans 2021 to 2027	2022	These plans outline actions by risk management authorities to manage flooding from rivers, the sea, groundwater, surface water, and reservoirs. They cover significant Flood Risk Areas within each River Basin District and support delivery of the National Flood and Coastal Erosion Risk Management Strategy. The draft HENPS should ensure Heathrow options account for local and regional flood risk and incorporate appropriate adaptation and resilience measures.

Document title	Date	Relevance to the draft HENPS
Flood and Water Management Act 2010	2010	This Act establishes responsibilities for managing flood and coastal erosion risk, improving drainage systems, and safeguarding water supplies. It strengthens the role of local authorities and requires integrated approaches to managing water-related hazards. The draft HENPS should ensure airport development adheres to the Act's risk-management requirements and incorporates robust surface water and flood resilience.
The Floods and Water (Amendment etc.) (EU Exit) Regulations 2019	2019	These Regulations ensure that the UK's flood and water management regime continues to operate effectively after EU withdrawal, retaining existing protections and risk-management processes. The draft HENPS should ensure airport infrastructure continues to comply with the retained regulatory framework governing flood and water resilience.
Independent Assessment of UK Climate Change Risk	2021	This statutory assessment by the Climate Change Committee identifies over 60 climate-related risks to the UK's environment, infrastructure, health and economy, and highlights a widening gap between risk levels and current adaptation action. The report identifies eight areas needing urgent early-stage adaptation. The draft HENPS should ensure airport development responds to priority national climate risks, strengthening resilience to flooding, heat, infrastructure failure, and supply-chain disruption.
National Infrastructure Assessment	2018	This assessment outlines long-term infrastructure needs and includes recommendations for improving resilience to floods, heat, and other climate impacts. It stresses the importance of integrating adaptation into all major infrastructure planning. The draft HENPS should ensure the design and operation of airport infrastructure incorporates long-term climate resilience in line with national infrastructure recommendations.

Document title	Date	Relevance to the draft HENPS
UK Infrastructure: A 10 Year Strategy	2025	The Strategy sets out Government policy for delivering resilient national infrastructure that can withstand climate impacts. It promotes investment in infrastructure capable of handling future flood, heat and weather-related risks while supporting national climate adaptation objectives. The draft HENPS should ensure Heathrow expansion aligns with national ambitions for climate-resilient infrastructure systems.
The Ten Point Plan for a Green Industrial Revolution	2020	This plan includes commitments to build climate-resilient low-carbon infrastructure and enhance environmental protection. It recognises the need for infrastructure capable of withstanding changing climate conditions alongside decarbonisation. The draft HENPS should ensure that airport development supports the Plan's resilience goals and contributes to a climate-ready infrastructure system.
Third National Adaptation Programme (NAP3) and the Fourth Strategy for Climate Adaptation Reporting	2023	NAP3 sets out the Government's statutory plan for adapting the UK to climate change from 2023–2028, covering infrastructure, the natural environment, health, communities and supply chains. The Adaptation Reporting Power establishes a framework for key organisations to report on climate risks and adaptation progress. The draft HENPS should ensure airport development aligns with national adaptation priorities and supports improved reporting and preparedness for climate impacts.
UK Climate Change Risk Assessment 2022	2022	The third UK Risk Assessment (CCRA3) identifies 61 priority climate risks (including flooding, overheating, water scarcity, infrastructure disruption, and supply-chain risks) and highlights the need for stronger adaptation action across sectors. It emphasises the importance of climate-informed planning for long-lived infrastructure. The next Climate Change Risk Assessment (CCRA4) is due in 2027, and future policy and decision-making should take account of the most up-to-date evidence as it becomes available.

Document title	Date	Relevance to the draft HENPS
		The draft HENPS should ensure Heathrow-related development incorporates future climate projections and avoids locking in poorly designed responses to climate risks.
Airspace Modernisation Strategy 2023–2040 (CAA)	2023	The Airspace Modernisation Strategy (AMS), led by the UK Civil Aviation Authority (CAA), sets the long-term plan for redesigning and updating UK airspace to ensure the system is resilient, efficient and able to accommodate future challenges. The strategy aims to modernise airspace structures, navigation technology and operational practices through coordinated "delivery elements" running to 2040. Modernisation is a key national infrastructure programme co-sponsored by the CAA and Department for Transport, intended to make UK aviation more efficient, safer and more resilient to weather-related disruption by improving the way airspace is used and accommodating new and emerging aviation technologies. The programme explicitly identifies the need to improve resilience of flight operations under increasing traffic and climatic pressures. The draft HENPS should ensure that any Heathrow expansion aligns with the Airspace Modernisation Strategy, including adaptation measures that strengthen operational resilience to future climate impacts such as increased turbulence, extreme weather, and capacity constraints.
English		
Planning Practice Guidance – Climate Change	2019	This guidance sets out how planning should identify and implement mitigation and adaptation measures, including flood resilience, heat risk preparation, and climate-responsive design. The draft HENPS should ensure airport development in England incorporates adaptation measures in line with UK planning guidance.
Climate Change Adaptation Manual	2020	Produced by Natural England and the Environment Agency, the Manual provides principles for climate-resilient management of natural and built environments. It prioritises flexible, ecosystem-based approaches that avoid maladaptation and support long-term resilience.

Document title	Date	Relevance to the draft HENPS
		The draft HENPS should ensure airport development follows adaptation principles that enhance resilience while avoiding adverse environmental impacts.
Flood and coastal erosion risk management: policy statement	2020	This policy outlines the Government's ambition to create a nation more resilient to flooding and coastal change, including upgraded defences, nature-based solutions, and community preparedness. The draft HENPS should ensure airport-related proposals support national flood and erosion resilience objectives.
National Flood and Coastal Erosion Risk Management Strategy for England	2020	This Strategy details actions required to manage future flood and coastal erosion risks, focusing on climate-resilient places, climate-ready infrastructure, and enhanced public awareness. The draft HENPS should ensure Heathrow expansion contributes to resilient local infrastructure and accounts for future climate-driven flood risks.
Natural England's climate change risk assessment and adaptation plan	2021	The plan sets out themes for integrating climate adaptation with nature recovery, natural capital, habitat resilience, and ecosystem-based responses. It identifies risks to species, habitats, protected areas, and natural capital. The draft HENPS should ensure airport development supports ecosystem resilience and avoids exacerbating climate-related pressures on habitats and natural landscapes.
Regional & Local		
Local Authority Climate Adaptation and Resilience Plans	Various	Local authorities around Heathrow have adaptation or resilience strategies addressing flood risk, heat risk, green infrastructure, and climate resilience in community planning. These plans often form part of Climate Emergency action plans.

Document title	Date	Relevance to the draft HENPS
		The draft HENPS should ensure that Heathrow-related development is compatible with local authority climate resilience priorities and risk management measures.

12.7. Communities and quality of life

Table 12-6: Plans, policies and programmes related to the communities and quality of life AoS topic

Document title	Date	Relevance to the draft HENPS
International		
The Aarhus Convention	2001	The Aarhus Convention is a multilateral environmental agreement through which opportunities for citizens to access environmental information are increased, transparency is strengthened, and reliable regulatory procedures are secured. It encourages access to information, public participation and access to justice. The draft HENPS should ensure that airport-related development adheres to the principles of transparency, public participation and access to information set out in the Convention.
WHO Closing the Gap in a Generation	2008	This WHO report focuses on improving daily living conditions, addressing inequitable distribution of resources and power, and strengthening understanding of health inequalities. It informed the Marmot Review (Fair Society, Healthy Lives, 2010), which outlines key policy objectives based on the social determinants of health, including early life, education, employment, living standards, community environments and ill-health prevention. The draft HENPS should ensure that airport expansion considers potential impacts on health inequalities and supports healthier living conditions for affected communities.
WHO Guidelines for Community Noise	1999	These guidelines provide recommended internal and external noise levels for different building uses and outline potential health impacts associated with noise, including effects on speech, sleep and general wellbeing. The draft HENPS should ensure that airport development appropriately considers and minimises community exposure to noise in line with these guidelines.

Document title	Date	Relevance to the draft HENPS
UK-Wide		
Children's Environment and Health Action Plan (CEHAP)	2007	This plan summarises UK-wide initiatives addressing environmental and health issues affecting children and young people. It highlights long-standing national efforts to improve child health through cleaner and healthier environments. The draft HENPS should ensure that airport expansion considers potential effects on children's health and wellbeing in line with this plan.
Equality Act	2010	The Equality Act 2010 brings together previous anti-discrimination laws into a single framework and protects individuals from discrimination across nine protected characteristics. It includes the Public Sector Equality Duty (PSED), which requires public authorities to have due regard to eliminating discrimination, advancing equality of opportunity, and fostering good relations when making decisions or developing policies. The draft HENPS must demonstrate compliance with the PSED by assessing whether airport expansion could differentially or disproportionately affect people with protected characteristics and ensuring equality considerations inform policy decisions.
Health and Social Care Act	2012	The Health and Social Care Act 2012 restructured the health system in England. It created Clinical Commissioning Groups (CCGs), established Health and Wellbeing Boards, and transferred key public health responsibilities to local authorities, including duties to improve population health and reduce health inequalities. The draft HENPS must consider how airport expansion may influence local public health outcomes (such as noise, air quality, physical activity, and access to services) in line with local authorities' statutory duties to improve health and reduce inequalities.

Document title	Date	Relevance to the draft HENPS
Countryside and Rights of Way Act	2000	This Act provides for public access on foot to certain types of land, amends legislation relating to public rights of way, strengthens protections for Sites of Special Scientific Interest (SSSIs), and improves management of Areas of Outstanding Natural Beauty (now National Landscapes). It aligns with the European Convention on Human Rights. The draft HENPS should ensure that airport development respects public access rights, designated landscape protections and the rights of affected individuals.
Design Principles for National Infrastructure	2020	These principles guide the planning and delivery of major infrastructure projects across sectors including transport, energy, water and digital communications. They emphasise resilience, sustainability, integration and high-quality design. The draft HENPS should ensure that airport expansion is guided by these nationally recognised design principles.
English		
England Trees Action Plan 2021 to 2024	2021	This plan supports woodland protection, nature recovery, a thriving forest economy, the role of trees in water and soil management, urban tree planting, heritage landscapes and climate resilience. The draft HENPS should ensure that airport development protects existing woodland, supports woodland resilience and contributes positively to tree cover where relevant.
England Tree Strategy Consultation	2020	The consultation explored policy options to increase tree planting, improve woodland management, enhance public access to woodlands and expand the use of sustainable timber, contributing to climate and biodiversity objectives. The draft HENPS should consider opportunities for tree retention, enhancement and planting in and around airport development, consistent with national tree and habitat ambitions.

Document title	Date	Relevance to the draft HENPS
Green Infrastructure Standards	2023	These standards define quality and quantity expectations for green infrastructure to support climate adaptation, net zero, nature recovery and community wellbeing. They cover greenspace accessibility, urban greening, nature recovery and tree canopy cover. The draft HENPS should seek to incorporate and protect green infrastructure, especially in urban areas affected by airport expansion.
The Nature Recovery Network (NRN)	2020	The NRN is a national initiative aimed at restoring wildlife-rich habitats, improving resilience to climate change, enhancing cultural landscapes and strengthening people's connection with nature. The draft HENPS should ensure that airport development avoids habitat fragmentation, supports nature recovery where possible and aligns with long-term biodiversity objectives.
Planning for the Future: A guide to working with National Highways on planning matters	2023	This guidance describes how National Highways engages with local authorities and developers on planning proposals affecting the Strategic Road Network. The draft HENPS should ensure that airport expansion appropriately considers impacts on the Strategic Road Network and engages with National Highways where required.

12.8. Economy

Table 12-7: Plans, policies and programmes related to the economy AoS topic

Document title	Date	Relevance to the draft HENPS
International		
International Civil Aviation Organization (ICAO) – Economic Development of Air Transport Framework		ICAO policies promote air connectivity as a driver of economic development, encourage efficient and competitive markets, and support sustainable growth of international aviation. The draft HENPS should ensure that airport expansion supports global aviation economic connectivity, competition and efficient air transport markets.
UK-Wide		
UK Government Update on Airport Expansion (2025)	2025	The UK Government confirms that aviation is critical to national economic growth, supporting the UK services sector, trade, innovation and tourism. In 2023: • Air freight accounted for 57% of the UK's non-EU exports by value. • Overseas residents spent £31 billion during visits to the UK. • The air transport sector contributed £14 billion to UK GDP, supporting 140,000+ direct jobs. • The update also identifies capacity constraints at Heathrow as a direct economic risk affecting delays, competition, fares and the UK's hub status. The draft HENPS should align with Government policy recognising airport expansion as fundamental to national competitiveness, exports, productivity and global connectivity

Document title	Date	Relevance to the draft HENPS
Environmental Audit Committee – Airport Expansion & Climate and Nature Targets (2025)	2025	Government policy frames airport expansion as a driver of economic growth, but the Committee notes a lack of fully evidenced economic justification, particularly in light of Net Zero policy shifts. It identifies gaps in the draft HENPS due to outdated assumptions compared to new climate legislation. The draft HENPS should incorporate up-to-date economic assessments reflecting decarbonisation constraints, cumulative schemes, and modern economic evidence requirements.
Jet Zero Strategy (2022)	2022	The Jet Zero Strategy sets out the UK Government's approach to achieving net-zero aviation by 2050 while maintaining the economic benefits of a globally connected aviation sector. It emphasises innovation, sustainable aviation fuels (SAF), improvements in aircraft efficiency, and cleaner airport operations. It also supports the development of new green industries, supply chains, and skills linked to decarbonisation technologies, helping to maintain the UK's competitiveness in a transitioning global market. The Jet Zero Strategy is therefore closely aligned with the objectives of the draft HENPS, which highlights the need for additional aviation capacity to support national economic growth.
UK Infrastructure: A 10 Year Strategy	2025	The Government's national infrastructure policy emphasises: • Supporting sustainable economic growth • Long-term competitiveness • Connecting UK regions The draft HENPS should situate airport capacity within wider national infrastructure goals, including productivity, regional equality and trade.

Document title	Date	Relevance to the draft HENPS
Industrial Strategy	2025	The UK's Modern Industrial Strategy (2025) sets out a long-term framework to increase business investment, accelerate growth in emerging sectors, and provide stability for firms making major capital decisions. It establishes missions around "grand challenges," expands sector-specific plans (e.g. advanced manufacturing, digital, life sciences), and aims to modernise UK economic institutions, markets, innovation diffusion, skills and public procurement. The Industrial Strategy is economically relevant because airports function as critical enablers of trade, innovation and connectivity, supporting productivity, supply chains, inward investment and global competitiveness. The draft HENPS should ensure that airport expansion aligns with the Industrial Strategy's focus on boosting productivity, improving UK competitiveness, supporting strategic sectors (e.g. services, digital, creative industries) and enabling long-term investment conditions.
Tourism Recovery Plan	2021	The Tourism Recovery Plan provides the UK Government's framework for assisting and accelerating the tourism sector's recovery from the COVID-19 pandemic. The Plan replaces the 2019 Tourism Sector Deal and establishes both short-term and long-term measures to restore domestic and international tourism. It recognises that tourism was one of the hardest-hit sectors, with inbound flight arrivals falling by 90% year-on-year in 2020 and prolonged closures across accommodation, attractions and travel services. Airport expansion directly influences the UK's ability to restore inbound visitor numbers, support regional tourism economies, enable business events, and enhance international connectivity. The draft HENPS should therefore ensure that aviation infrastructure decisions support the objectives of the Tourism Recovery Plan, particularly around boosting inbound tourism, strengthening accessibility, and promoting sustainable, resilient growth across the visitor economy.

12.9. Historic environment

Table 12-8: Plans, policies and programmes related to the historic environment AoS topic

Document title	Date	Relevance to the draft HENPS
International		
Convention on the Protection of the Archaeological Heritage of Europe (The Valetta Convention)	1992	This Convention establishes legal standards for protecting archaeological heritage and integrates archaeological conservation into spatial and urban planning. It promotes coordinated working between planners and archaeologists to safeguard heritage during development. The draft HENPS should ensure that airport-related development incorporates these principles and protects archaeological assets through early assessment and integrated planning.
The World Heritage Convention	1972	This Convention recognises that cultural and natural heritage is increasingly threatened by social and economic pressures and that any deterioration of such heritage constitutes an irreversible loss to humanity. The draft HENPS should ensure that airport expansion avoids adverse impacts on World Heritage Sites and their settings and upholds obligations to protect globally significant heritage assets.
UK-Wide		
Ancient Monuments and Archaeological Areas Act 1979	1979	This Act protects scheduled monuments from disturbance or works without consent. Historic England advises on applications and decisions must ensure works benefit or protect long-term sustainability of sites. The draft HENPS should ensure that airport-related development avoids harm to scheduled monuments and complies with consent requirements.

Document title	Date	Relevance to the draft HENPS
The Heritage Statement 2017	2017	This statement sets out how government supports the heritage sector to maximise social and economic benefits while ensuring protection of heritage assets. The draft HENPS should ensure that airport expansion protects and enhances the historic environment and supports wider heritage value.
Historic Buildings and Ancient Monuments Act 1953	1953	This Act provides for the preservation and acquisition of buildings of outstanding architectural or historic interest and related property. The draft HENPS should ensure airport development respects the integrity and setting of such buildings and avoids harmful change.
Planning (Listed Buildings and Conservation Areas) Act 1990	1990	This Act governs controls over works affecting listed buildings or conservation areas. Consent is required for alteration, demolition or extension affecting special interest. The draft HENPS should ensure airport-related development safeguards listed buildings and conservation areas and follows statutory consent processes.
English		
National Policy Statement for National Networks (NPSNN)	2014 (updated 2024)	The NPSNN sets out policy for assessing and mitigating impacts from nationally significant road and rail projects, including a dedicated section on the Historic Environment, which requires applicants to identify heritage assets, assess significance, evaluate impacts, and avoid or minimise harm. Its heritage tests closely mirror the NPPF, including setting, conservation, significance and the requirement for proportionate assessment. Although focused on road/rail NSIPs, these principles are routinely used as cross-sector precedents for cultural heritage assessment in NSIP examinations.

Document title	Date	Relevance to the draft HENPS
		The draft HENPS should ensure airport-related development reflects NPSNN expectations on identifying affected heritage assets, assessing significance, managing impacts on setting, and securing mitigation.
England Trees Action Plan 2021 to 2024	2021	This plan focuses on protecting ancient woodlands, heritage landscapes and veteran trees, promoting landscape-scale planning and conservation of natural heritage. The draft HENPS should ensure airport expansion avoids loss or harm to ancient woodland, heritage landscapes and veteran trees and supports long-term resilience of these historic landscape features.
Historic England Good Practice Advice (GPA) Notes (GPA1, GPA2, and GPA3) and Advice Note 8	Various	Historic England's GPA series provides nationally recognised best-practice guidance for implementing heritage policy under the NPPF: GPA1 (Historic Environment in Local Plans), GPA2 (Managing Significance in Decision-Taking), and GPA3 (The Setting of Heritage Assets). GPA2 outlines assessing significance, using expertise, cumulative effects, and proportionate information. GPA3 provides structured, staged guidance for assessing setting and views, with strong relevance to airports due to potential visual, noise and movement impacts on heritage settings. Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment provides specific guidance on the effective consideration of the historic environment within Sustainability Appraisal and Strategic Environmental Assessment processes. It emphasises the importance of proportionate assessment, early scoping of heritage issues, the consideration of cumulative and indirect effects, and the potential for both adverse and beneficial effects on the historic environment. The draft HENPS should ensure assessment of airport expansion follows GPA methodologies for identifying significance, evaluating setting impacts, and exploring mitigation
Conservation Principles, Policies	2008	This document sets out the overarching principles that underpin all of Historic England's decision-making, establishing a transparent, values-based framework for understanding

Document title	Date	Relevance to the draft HENPS
and Guidance (Historic England)		significance, assessing heritage values, and managing change to historic places. It provides the foundation for interpreting heritage significance and determining acceptable levels of change across all sectors. The draft HENPS should ensure that airport-related development uses Conservation Principles to structure the assessment of significance, manage change sustainably, and ensure decisions are informed, transparent and proportionate.

12.10. Landscape

Table 12-9: Plans, policies and programmes related to the landscape AoS topic

Document title	Date	Relevance to the draft HENPS
International		
The European Landscape Convention (The Florence Convention)	2000	The Convention recognises that landscapes form a key part of Europe's natural and cultural heritage, contribute to wellbeing and identity, and are being rapidly transformed by changes in land use, economic activity, infrastructure, tourism and planning. It promotes landscape protection, management and planning, and cooperation between countries. The draft HENPS should ensure that airport-related development is in line with this Convention and takes full account of impacts on landscape character and landscape change.
UK-Wide		
Countryside and Rights of Way Act	2000	This Act provides for public access to certain types of land, strengthens protection for SSSIs, enhances wildlife enforcement, and improves management of Areas of Outstanding Natural Beauty (now National Landscapes). The draft HENPS should ensure that airport-related development adheres to this Act, particularly regarding effects on public access, designated landscapes and protected habitats.
English		
National Policy Statement for National Networks (NPSNN)	2014 (updated 2024)	The NPSNN sets out policy for assessing and mitigating landscape and visual impacts arising from nationally significant road and rail projects. It includes a dedicated section on Landscape and Visual Impact, which requires applicants to: • identify landscape receptors and key views;

Document title	Date	Relevance to the draft HENPS
		• assess landscape character, scenic quality, tranquillity and dark skies; • evaluate the scale and nature of visual effects; • avoid, reduce and mitigate adverse landscape and visual impacts through design, siting and screening; and • give particular protection to National Parks, National Landscapes (AONBs), Heritage Coasts and their settings. Although focused on road and rail NSIPs, the NPSNN's landscape principles are routinely used as cross-sector precedents in NSIP examinations due to their clarity on character assessment, setting, views, and mitigation expectations. The draft HENPS should ensure airport-related development reflects NPSNN expectations on identifying affected landscape receptors, assessing landscape character and visual effects, managing impacts on designated and locally valued landscapes, and securing appropriate mitigation.
Delivering 30 by 30 on land in England	2020	The Government aims to protect 30% of land for nature by 2030, expanding protected areas beyond the existing 26% by safeguarding an additional c.400,000 ha. New investment through Nature for Climate Fund and Environmental Land Management (ELM) schemes supports this. The draft HENPS should ensure airport-related development supports the 30x30 ambition and does not undermine the protection or recovery of England's valued landscapes.
England Trees Action Plan 2021 to 2024	2021	This plan focuses on nature recovery, ancient woodland protection, landscape-scale tree planning, improved soils, urban greening, woodland access, heritage and landscape considerations, climate resilience and a thriving forest economy.

Document title	Date	Relevance to the draft HENPS
		The draft HENPS should ensure airport-related development respects and protects woodland landscapes, ancient and veteran trees, and contributes positively to landscape-scale planning.
England Tree Strategy Consultation	2020	Consultation on expanding tree planting, improving management, enhancing access, protecting ancient woodlands, increasing sustainable timber use, and supporting the Nature Recovery Network. The draft HENPS should ensure airport-related development aligns with national woodland and treescape objectives, particularly where landscape character, woodland settings or ancient trees may be affected.
The Environmental Targets (Woodland and Trees Outside Woodland) (England) Regulations 2023	2023	These regulations set a long-term statutory target for 16.5% woodland and tree cover by 2050, with Forestry Commission monitoring. The draft HENPS should ensure airport-related development supports the achievement of long-term woodland cover targets and avoids unnecessary loss of trees or woodland resources.
Government Forestry and Woodlands Policy Statement	2013	This statement -provides policy direction for protecting, improving and expanding woodland resources, increasing resilience, supporting economic growth, and addressing risks such as pests, disease and climate change. The draft HENPS should ensure airport-related development supports these policy aims and avoids undermining woodland resilience or the quality of landscape features.

Document title	Date	Relevance to the draft HENPS
Green Infrastructure Standards	2023	These Standards define what “good” green infrastructure looks like, covering strategy, accessible greenspace, urban nature recovery, urban greening and canopy cover. They aim to support climate adaptation, nature recovery, net-zero, and wellbeing. The draft HENPS should ensure airport-related development incorporates high-quality green infrastructure that protects and enhances landscape value.
The Town and Country Planning (Trees Preservation) (England) Regulations 2012	2012	These Regulations govern applications for works to trees protected by Tree Preservation Orders (TPOs), requiring detailed written submissions and evidence. The draft HENPS should ensure airport-related development complies with TPO requirements and protects important landscape trees.

12.11. Noise

Table 12-10: Plans, policies and programmes related to the noise AoS topic

Document title	Date	Relevance to the draft HENPS
International		
WHO Environmental noise guidelines for the European Region	2018	These guidelines provide evidence-based recommendations for protecting human health from exposure to environmental noise from major sources including aircraft, road traffic, railways, wind turbines and leisure noise. They identify exposure thresholds at which adverse health effects occur and set out recommended limit values designed to inform public policy and noise regulation globally. The draft HENPS should ensure that airport-related development aligns with these WHO guidelines, minimising community exposure to harmful levels of environmental noise.
WHO Guidelines for Community Noise	1999	These guidelines set recommended internal and external noise levels for a wide range of building types and uses. They outline the potential health effects of environmental noise, including sleep disturbance, speech interference, and broader wellbeing impacts. The draft HENPS should ensure airport-related development minimises community and sensitive-receptor exposure to noise in accordance with WHO principles.
ICAO Balanced Approach to Aircraft Noise Management	2001	The ICAO Balanced Approach provides the internationally recognised framework for managing aircraft noise through four components: reduction at source, land-use planning, operational procedures and operating restrictions (as a last resort). It is embedded in UK aviation policy and informs regulatory processes. The draft HENPS should ensure that noise management expectations for airport development reflect the Balanced Approach, consistent with UK and international policy.

Document title	Date	Relevance to the draft HENPS
UK-Wide		
Overarching Aviation Noise Policy Statement	2023	The Overarching Aviation Noise Policy Statement sets out the Government's updated policy position on managing aviation noise across the UK. It provides guidance for airports, regulators and stakeholders on how noise management should balance environmental, operational and economic considerations, and informs the preparation of Noise Action Plans and night-noise objectives. The draft HENPS should take account of the national approach to aviation noise set out in this policy when defining requirements for future airport development.
Civil Aviation Act	1982	The Act provides the statutory framework for civil aviation regulation in the UK. Under Section 78, the Secretary of State sets night-flight restrictions at designated airports, including limits on night movements and noise quota counts at Heathrow. These legal powers underpin the current Night Flights Regime and the airport's statutory duties to manage and enforce night-time noise controls. Any proposals with implications for night operations must be consistent with the restrictions and statutory powers established under the Act.
Air Navigation Guidance (ANG)	2017	The Air Navigation Guidance 2017 provides statutory guidance to the Civil Aviation Authority (CAA) on the Government's environmental objectives when exercising its air navigation functions, including airspace design, noise management and environmental assessment. It establishes expectations for: • limiting and, where possible, reducing the number of people significantly affected by aircraft noise; • ensuring transparent, evidence-based assessment of airspace changes; • undertaking options appraisal and community engagement during airspace design processes; • interpreting noise impacts in terms of health and quality of life, consistent with national policy.

Document title	Date	Relevance to the draft HENPS
		ANG 2017 is a core aviation noise policy document and directly influences how flightpaths, altitudes and operational procedures are designed and evaluated. The draft HENPS should ensure that airport-related development aligns with ANG 2017, particularly in relation to noise minimisation, airspace change, community impacts and transparent assessment.
England		
The Environmental Noise (England) Regulations 2006	2006	These Regulations implement the Environmental Noise Directive (END) in England, requiring strategic noise mapping and the preparation of Noise Action Plans for major sources of environmental noise, including airports. They provide the framework for assessing population exposure and identifying "Important Areas" for noise mitigation. The draft HENPS should ensure that airport-related development complies with these Regulations, including strategic noise mapping and incorporation of action plan measures.
Noise Policy Statement for England (NPSE)	2010	The NPSE sets out the national noise policy framework, introducing the key concepts of: • NOEL – No Observed Effect Level • LOAEL – Lowest Observed Adverse Effect Level • SOAEL – Significant Observed Adverse Effect Level The NPSE requires that where noise falls between LOAEL and SOAEL, all reasonable steps must be taken to mitigate and minimise adverse effects while taking account of sustainable development principles. Above SOAEL, noise effects become unacceptable. The draft HENPS should ensure that airport-related development adheres to the NPSE, applying LOAEL/SOAEL principles to protect health and quality of life.

12.12. Resources and waste

Table 12-11: Plans, policies and programmes related to the resources and waste AoS topic

Document title	Date	Relevance to the draft HENPS
UK-Wide		
Agriculture Act 2020	2020	This Act contains provisions relating to land management payments, environmental protection and resilience of primary production systems. The draft HENPS should ensure that airport-related development supports sustainable land and resource use in line with this Act.
Design Principles for National Infrastructure	2020	This guidance sets out four overarching design principles that apply across infrastructure sectors, including waste and resource systems. The draft HENPS should ensure that airport-related development adopts these principles, particularly around sustainable material use and minimising waste.
Environmental Protection Act 1990	1990	This Act covers pollution control, waste disposal and statutory nuisance provisions. The draft HENPS should ensure that airport-related development manages waste and pollution in compliance with this legislation.
Independent Assessment of UK Climate Change Risk	2021	This report highlights vulnerabilities in UK infrastructure, supply chains and waste systems, and notes risks to critical resources. The draft HENPS should ensure that airport-related development builds resilience into resource supply and waste management systems.
Circular Economy Package (CEP)	2019	These Regulations transpose the EU's 2020 Circular Economy Package (CEP) into UK law. They amend existing domestic legislation implementing the Waste Framework Directive, Landfill

Document title	Date	Relevance to the draft HENPS
		Directive, and Packaging Waste Directive, and introduce updated definitions, strengthened requirements on waste prevention, separate collection, material recovery, and treatment of hazardous waste. The Regulations form part of the UK's transition towards a more circular economic model by improving recycling systems, reducing landfill, and requiring clearer waste-hierarchy compliance. The draft HENPS should ensure that airport-related development aligns with CEP principles by prioritising waste prevention, maximising reuse and recycling, and avoiding disposal except where environmentally justified.
English		
Environmental Damage (Prevention and Remediation) (England) Regulations 2015 as amended by The Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019	2015	These regulations require operators to prevent or remediate environmental damage, including land and water contamination arising from waste activities. The draft HENPS should ensure that airport-related development prevents damage associated with waste management activities.
The Environmental Permitting (England	2016	Regulates activities such as waste operations, discharges, emissions and industrial processes.

Document title	Date	Relevance to the draft HENPS
and Wales) Regulations 2016		The draft HENPS should ensure that airport-related development secures relevant permits and adheres to environmental standards.
The Environmental Targets (Residual Waste) (England) Regulations 2023	2023	These regulations set a statutory long-term target for reducing residual waste to 287 kg/person/year by 2042. The draft HENPS should ensure that airport-related development contributes to achieving national residual-waste reduction targets.
Government Review of Waste Policy in England 2011	2011	This policy emphasises the waste hierarchy, sustainable material use and improved services for households and businesses. The draft HENPS should ensure that airport-related development applies the waste hierarchy to minimise waste.
National Planning Policy for Waste	2014	This policy provides detailed waste-planning policy to support sustainable waste infrastructure and guide decision-making. The draft HENPS should ensure that airport-related development aligns with national waste-planning policy.
Resource and Waste Strategy for England	2018	This strategy sets out how material resources will be preserved by minimising waste, promoting resource efficiency and moving towards a circular economy in England. It combines actions the Government will take now with firm commitments for the coming years and gives a clear longer-term policy direction in line with our 25-Year Environment Plan. It sets out to double resource productivity and eliminate avoidable waste of all kinds (including plastic waste) by 2050, minimise the damage caused to our natural environment by reducing and managing waste safely and carefully and deal with waste crime. A more circular economy (re-use, remanufacture, repair, recycle) will keep resources in use for as long as possible. It will allow the Government to extract

Document title	Date	Relevance to the draft HENPS
		maximum value from them, then recover and regenerate products and materials at the end of their lifespan. The draft HENPS should ensure that airport-related development maximises resource efficiency and supports circular-economy outcomes.
Waste Management Plan for England 2021	2021	This plan consolidates existing waste policy into a national plan and sets the framework for waste management. The draft HENPS should ensure that airport-related development supports national waste-management objectives.
Waste Prevention Programme for England	2013	This Programme sets out the government's view of the key roles and actions which should be taken to move towards a more resource efficient economy. As well as describing the actions the government is taking to support this move, it also highlights actions businesses, the wider public sector, the civil society and consumers can take to benefit from preventing waste. The draft HENPS should ensure that airport-related development prioritises waste prevention.
Waste (England and Wales) Regulations 2011 as amended by The Waste (England and Wales) (Amendment) Regulations 2014	2014	These regulations implement the revised EU Waste Framework Directive 2008/98 which sets requirements for the collection, transport, recovery and disposal of waste. It outlines that it is a requirement for businesses to confirm that they have applied the waste management hierarchy when transferring waste and include a declaration to this effect on their waste transfer note or consignment note. The regulations apply to businesses that: • Produce waste; • Import or export waste; • Carry or transport waste;

Document title	Date	Relevance to the draft HENPS
		• Keep or store waste; • Treat waste; • Dispose of waste; and • Operate as waste brokers or dealers. The draft HENPS should ensure that airport-related development complies with the waste hierarchy and maintains proper waste controls.
Regional & Local		
Local Authority Waste Management Strategy	Various	Local authorities are responsible for managing municipal waste streams and preparing Waste Management Strategies that set out local approaches to waste reduction, recycling, reuse, residual-waste treatment, and provision of waste infrastructure and collection systems. These strategies typically include local recycling targets, service-design requirements (e.g., separate food waste collections), waste-handling capacity considerations, and circular-economy ambitions. The draft HENPS should ensure that airport-related development aligns with local waste-management approaches, does not place undue pressure on local waste infrastructure capacity, and supports local objectives for waste minimisation, recycling and sustainable waste handling.
Minerals & Waste Local Plans	Various	Each county, unitary authority, or combined planning authority is required to prepare a Minerals & Waste Local Plan, forming part of its statutory development plan. MWLPs set out planning policies for: • provision, safeguarding and location of waste-management infrastructure, • policies on construction, demolition and excavation waste,

Document title	Date	Relevance to the draft HENPS
		• requirements for hazardous-waste handling, • landfill diversion and recovery obligations, • the waste hierarchy and circular-economy principles, • protection of land and environmental receptors (including soils and water) from waste-related impacts. These plans act as the primary decision-making framework for local waste-facility planning. The draft HENPS should ensure that airport-related development adheres to relevant Minerals & Waste Local Plan policies, supports sustainable waste management across construction and operation, and avoids conflict with safeguarded waste sites or planned local waste-infrastructure provision.

12.13. Soil

Table 12-12: Plans, policies and programmes related to the soil AoS topic

Document title	Date	Relevance to the draft HENPS
UK-Wide		
Agriculture Act 2020	2020	This Act introduces a new land management system based on paying for "public goods," including environmental protection, soil conservation, access to the countryside and plant/animal health. The Act also includes obligations for reporting on how agricultural product standards under free trade agreements align with UK protections. The draft HENPS should ensure that airport-related development respects soil conservation principles and supports sustainable land stewardship in line with this Act.
Design Principles for National Infrastructure	2020	This framework identifies four principles (climate, people, places and value) to guide major UK infrastructure design. It applies across all economic infrastructure sectors, including transport and waste. The draft HENPS should ensure that airport-related development incorporates these design principles, particularly with respect to soil protection, land function and minimising land degradation.
Environmental Protection Act 1990	1990	This Act provides the regulatory foundation for pollution control, waste disposal and statutory nuisances, including controls on pollution affecting soil. The draft HENPS should ensure that airport-related development prevents soil contamination and complies with statutory pollution-control requirements.
Independent Assessment of UK	2021	Identifies climate-related risks including: loss of soil health from flooding and drought, risks to natural carbon stores, and impacts to infrastructure from degraded soils.

Document title	Date	Relevance to the draft HENPS
Climate Change Risk		The draft HENPS should ensure that airport-related development considers climate-related soil risks and integrates soil resilience into land management and construction practices.
The Multifunctional Land Use Framework: The key to better land use decisions	2023	This Framework promotes making integrated, sustainable decisions about land that account for ecological, economic and social functions. Soil health is central to multifunctional land use outcomes. The draft HENPS should ensure that airport-related development supports multifunctional land use and avoids unnecessary soil loss or degradation.
English		
The Contaminated Land (England) Regulations 2006 as amended by The Contaminated Land (England) (Amendment) Regulations 2012	2012	These Regulations set the framework for identifying and remediating contaminated land to protect human health and the environment. The draft HENPS should ensure that airport-related development assesses land contamination risks and implements appropriate remediation where necessary.
Land Use Framework	2026	The Land Use Framework sets out the Government's strategic approach to managing competing demands on land in England, including development, nature recovery, climate mitigation and adaptation, food production, water management and infrastructure delivery. The framework seeks to support more integrated, evidence-led and spatially informed decision-making, recognising land as a finite resource and the need to balance economic growth with environmental sustainability. The Framework emphasises the importance of protecting and enhancing multifunctional land, supporting nature recovery and ecosystem services, and managing trade-offs between development

Document title	Date	Relevance to the draft HENPS
		and environmental objectives at national and regional scales. It also highlights the role of strategic infrastructure planning in shaping long-term land use outcomes. The draft HENPS should take account of the Land Use Framework by ensuring that airport-related development is considered within the context of wider land-use pressures, supports efficient and responsible use of land, and contributes to the balanced delivery of economic, environmental and climate objectives over the lifetime of the policy.
PFAS Plan: building a safer future together	2026	The PFAS Plan: Building a Safer Future Together sets out the Government's strategic approach to managing risks from per- and polyfluoroalkyl substances (PFAS), recognising their persistence, mobility and potential impacts on soils, groundwater, surface waters, ecosystems and human health. The Plan focuses on improving the evidence base, strengthening monitoring, addressing legacy contamination, and supporting proportionate risk management across relevant sectors. The Plan highlights the importance of considering PFAS risks in the context of land use change, redevelopment of previously used land, soil disturbance and changes to drainage regimes, particularly where these could mobilise or spread contamination. The draft HENPS should ensure that airport-related development takes account of the objectives of the PFAS Plan by avoiding the exacerbation of PFAS-related risks to soils and controlled waters, supporting the protection of soil quality, and recognising emerging contaminant risks over the lifetime of the policy, with detailed investigation, assessment and remediation addressed at project and permitting stages.
England Trees Action Plan 2021 to 2024	2021	This plan includes commitments to improve soil health, enhance woodland resilience and ensure appropriate soil management during tree establishment. The draft HENPS should ensure that airport-related development protects soil quality, avoids damaging soil-dependent habitats and follows best practice in soil handling.

Document title	Date	Relevance to the draft HENPS
Environmental Damage (Prevention and Remediation) (England) Regulations 2015 as amended by The Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019	2015	These regulations impose obligations on operators of certain activities requiring them to prevent or remediate environmental damage. They apply to damage to protected species, natural habitats, SSSIs, water and land. The draft HENPS should ensure that airport-related development prevents soil damage and undertakes remediation where required.
The Environmental Permitting (England and Wales) Regulations 2016	2016	These regulations control activities that may pollute land or affect soil quality, including waste operations, industrial emissions and discharges. The draft HENPS should ensure that airport-related development obtains and adheres to relevant land-protection permits.
Safeguarding our Soils: A Strategy for England	2009	This strategy sets out the national approach to protecting soil in order to ensure long-term productivity, carbon storage, resilience and pollution prevention. The draft HENPS should ensure that airport-related development maintains or enhances soil quality throughout construction and operation.

12.14. Water

Table 12-13: Plans, policies and programmes related to the water AoS topic

Document title	Date	Relevance to the draft HENPS
International		
UNECE Water Convention (Convention on the Protection and Use of Transboundary Watercourses and International Lakes)	1992	This Convention is a core global legal instrument that promotes the sustainable use and protection of transboundary water resources, with a focus on cooperation, pollution prevention, ecological restoration and integrated water-resource management. It supports sustainable development, water security and climate resilience. The draft HENPS should ensure airport-related development supports the Convention's principles, including protecting water bodies, preventing pollution, and promoting sustainable water management.
Protocol on Water and Health	1999	A legally binding protocol linking water management and human health, requiring Parties to prevent water-related disease, improve water supply, and protect the environment. It provides a framework for reducing water pollution, safeguarding drinking-water sources and building resilience to climate change. The draft HENPS should ensure airport-related development safeguards human health by protecting water quality, drinking-water sources and sanitation systems.
UK-Wide		
Design Principles for National Infrastructure	2020	Sets out four principles (climate, people, places, value) to guide the planning and delivery of major UK infrastructure. These principles apply across sectors, including water, flood management and drainage.

Document title	Date	Relevance to the draft HENPS
		The draft HENPS should ensure that airport-related development follows these principles, promoting resilient water management and integrating climate-adaptation and placemaking considerations.
Environmental Protection Act 1990	1990	This Act provides the framework for integrated pollution control and statutory nuisances, including those affecting water quality and water pollution prevention. The draft HENPS should ensure that airport-related development prevents water pollution and complies with relevant pollution-control obligations.
Independent Assessment of UK Climate Change Risk	2021	Identifies risks to water availability, flooding, ecosystem health, and the resilience of infrastructure due to climate change. The draft HENPS should ensure that airport-related development accounts for climate-related water risks and integrates resilience into water resource, drainage and flood-risk planning.
River Basin Management Plans	2022	These plans set out how organisations and stakeholders will work together to protect and improve the water environment. They apply to all surface waters, groundwater, estuarine and coastal bodies. The draft HENPS should ensure that airport-related development supports the objectives of the relevant RBMP, avoids deterioration of water bodies and contributes to water-environment improvements.
Water Act 2014	2014	This Act reforms water-industry regulation to improve resilience, promote innovation and strengthen management of drought and flood risks. The draft HENPS should ensure that airport-related development supports resilient water-supply arrangements and efficient water use.

Document title	Date	Relevance to the draft HENPS
The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017	2017	These regulations require protection and enhancement of the ecological and chemical status of water bodies, addressing issues such as diffuse pollution, hydromorphology, habitat condition and flow. The draft HENPS should ensure that airport-related development avoids harmful impacts on water-body status and supports Water Framework Directive objectives.
Water Resources Act 1991	1991	This Act aims to prevent and minimise pollution of water. The policing of this Act is the responsibility of the Environment Agency and Natural Resources Wales. Under the act it is an offence to cause or knowingly permit any poisonous, noxious or polluting material, or any solid waste to enter any controlled water. Silt and soil from eroded areas are included in the definition of polluting material. If eroded soil is found to be polluting a water body or watercourse, the Environment Agency may prevent or clear up the pollution and recover the damages from the landowner or responsible person. The draft HENPS should ensure that airport-related development prevents pollution incidents and implements best practice in surface-water and runoff management.
Flood and Water Management Act	2010	This Act establishes responsibilities for managing flood risk and surface water, including the roles of Lead Local Flood Authorities. It supports Sustainable Drainage Systems (SuDS), resilience planning and integrated water management. The draft HENPS should ensure that airport-related development aligns with flood-risk management duties and incorporates sustainable drainage solutions.
English		
Environmental Damage	2015	These regulations requires prevention and remediation of environmental damage affecting water bodies, habitats and protected sites.

Document title	Date	Relevance to the draft HENPS
(Prevention and Remediation) (England) Regulations 2015 as amended by The Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019		The draft HENPS should ensure that airport-related development avoids water-environment damage and provides remediation where necessary.
Contaminated Land (England) Regulations	2006	The Contaminated Land (England) Regulations 2006 provide the legal framework for the identification, assessment and remediation of contaminated land where there is a significant risk of harm to human health or the water environment. The Regulations are particularly relevant to the protection of controlled waters, including groundwater and surface waters, and require risks arising from contamination to be investigated and addressed in a proportionate manner. In areas of historic or current industrial activity, including airports, legacy contamination can pose risks to groundwater quality and connected surface water bodies. The Regulations support a risk-based approach to preventing pollution, avoiding the mobilisation of contaminants, and protecting water resources from deterioration. The draft HENPS should ensure that airport-related development takes account of contaminated land risks to groundwater and surface waters, and supports compliance with the Contaminated Land Regulations through appropriate investigation, remediation and prevention of pollution at subsequent stages.

Document title	Date	Relevance to the draft HENPS
PFAS Plan: building a safer future together	2026	The PFAS Plan: Building a Safer Future Together sets out the Government's strategic approach to managing risks from per- and polyfluoroalkyl substances (PFAS), recognising their persistence, mobility and potential impacts on groundwater, surface waters, ecosystems and human health. The Plan focuses on improving the evidence base, strengthening monitoring, addressing legacy contamination, and supporting proportionate risk management across relevant sectors. The Plan highlights that existing and former airports and airfields are recognised sources of potential legacy PFAS contamination, with particular risks to groundwater and connected surface waters where there is hydraulic continuity. It emphasises the importance of avoiding actions that could mobilise contaminants, contribute to the deterioration of water quality, or hinder the achievement of Water Framework Directive objectives. The draft HENPS should ensure that airport-related development takes account of the objectives of the PFAS Plan by protecting groundwater and surface water quality, supporting the identification and management of legacy contamination risks, avoiding mobilisation of PFAS where groundwater-surface water interactions are present, and ensuring that development does not lead to deterioration in the status of water bodies, with detailed investigation, assessment and remediation addressed at project and permitting stages.
Plan for Water: Our integrated plan for delivering clean and plentiful water	2023	This plan sets out measures to improve water quality, reduce pollution, strengthen regulation, expand monitoring and increase investment in water supply and resilience. The draft HENPS should ensure that airport-related development aligns with national objectives for clean, resilient and well-managed water systems.
Regional & Local		

Document title	Date	Relevance to the draft HENPS
Water Resource Management Plans (WRMPs)	Various	Water companies prepare WRMPs setting out long-term strategies to balance supply and demand, manage drought risk and ensure secure water services. The draft HENPS should ensure that airport-related development is consistent with relevant WRMPs, supports regional water-supply resilience and avoids undue pressure on water resources
Drainage and Wastewater Management Plans (DWMPs)	Various	Prepared by wastewater undertakers, DWMPs identify risks and investment needs for drainage networks, wastewater capacity, storm overflows and sewer-flooding resilience. The draft HENPS should ensure that airport-related development integrates with DWMP objectives and does not increase pressure on local wastewater networks.

Appendix A : Record of scoping consultation and amendments to the AoS scoping report

Natural England	Question / Section	Comment	Amendments made:
From: S.W., Strategy and Government Advice – Planning and Infrastructure **Response received on**: 27.03.26	Question 1: Are the objectives and deliverables of the AoS clear?	The AoS should influence the development of the ANPS by shaping emerging policies within the policy statement, and we advise this should be stated clearly as part of its purpose in paragraphs 2.1.3 and 2.1.4. We are pleased to see that stage 2 in figure 2-1 does include developing and refining alternatives for elements of the AoS through the Environmental Assessment. Figure 2-1 clearly lists the deliverables for each stage.	N/A
	Question 2: Do you consider that all appropriate and relevant policies, plans, strategies (PPSs) have been identified (Scoping Report: Technical Annex)? Are there any other issues that have not been identified within the review of the PPSs that should be considered within the AoS?	• We query the relevance to the AoS of the 2023 ‘Nationally Significant Infrastructure: Action plan for reforms to the planning process’ document.	Retained, but amended the text to clarify relevance
	Chapter 12: Technical Annex	• We request clarity on which local plans will be within scope, considering the zone of influence of the NPS.	Included relevant Local Plans
	Chapter 12: Technical Annex	• The Levelling Up and Regeneration Act 2023 introduced a duty for relevant authorities to further the purposes of National Parks and	Added text to 9.4.2 MR and updated a

		National Landscapes, and we advise that this should be within the scope of the AoS.	supporting question
	Chapter 12: Technical Annex	• The Bern Convention on the Conservation of European Wildlife and Natural Habitats (https://www.coe.int/en/web/bern-convention) should be dated 1982, not 1886; and it is through the Wildlife and Countryside Act (1981 as amended) that the convention has been transposed into UK law.	Amended
	Chapter 12: Technical Annex	The Conservation of Habitats and Species Regulations 2017 should be listed as national rather than international.	Moved
	Chapter 12: Technical Annex	• The Planning Practice Guidance for the Natural Environment was updated in June 2025.	Amended
	Chapter 12: Technical Annex	• The London Local Nature Recovery Strategy has now been published (Local Nature Recovery Strategy | London City Hall)	Amended
	Chapter 12: Technical Annex	• We query why the Nature for Climate Peatland Grant Scheme has been listed without reference to the England Peat Action Plan.	Removed
	Chapter 12: Technical Annex	• The 2020 National Infrastructure Strategy has been superseded by the UK Infrastructure: A 10 Year Strategy, published in 2025.	Amended
	Question 3: Do you consider that all appropriate and relevant baseline information has been identified (including that set out in the Scoping Report: Technical Annex)? Are there any other issues that have not been identified within the review of the baseline data in that should be considered within the AoS?	• Natural England considers the geographic scope of the air quality baseline information to be too restricted. We advise that this should be expanded to reflect the zone of influence of the updated Airports NPS. We understand that detailed air quality modelling is currently being undertaken by the Heathrow expansion DCO project team and consider that these results could provide a more robust, evidence-led basis for defining zones of influence, including from the affected road network. The study area for biodiversity impacts should also be amended to account for protected sites within the air quality zone of influence.	A detailed air quality study is being undertaken for the ANPS. The air quality study has used the TAG screening criteria of 1000 Annual Average Daily Traffic (AADT) for defining the

			Zone of Influence- and not a distance criteria/band. The 1,000 AADT figure is a key screening threshold used in UK TAG and air quality management to determine if further environmental impact analysis is required for projects, particularly near ecologically sensitive sites. This will be used to inform the AoS report assessment.
	Air Quality	• The future baseline section makes reference to sustainable surface access strategies contributing to improved air quality. We would like to see further detail of what these would involve and how effective they would be across the affected road network.	This will be explored more in the AoS report at the next stage

	Air Quality	• In relation to the future baseline and the uptake of ultra-low emissions vehicles, we advise that there should be recognition that uptake of such vehicles may not be as rapid as predicted, and also that ammonia emissions should be considered for vehicles that are not fully electric.	Added extra text 1.2.4 -1.2.5 (Technical Annex, TA)
	Air Quality	• The future baseline text for air quality mentions that emissions of NOx may increase as a result of increased airport activity. We advise that ammonia concentrations and nitrogen deposition may also increase and should be considered.	Amended text 1.2.1-1.2.2 (TA)
	Air Quality / Biodiversity	• Natural England advises that air pollution can significantly affect the condition of habitats (including in protected sites), yet this is not reflected in the baseline information either for the air quality topic or for the biodiversity topic.	Added text to 2.1.11 (TA)
	Air Quality	• Background air quality data held on the Air Pollution Information System (APIS) should be considered.	Added extra text (1.1.8.)
	Biodiversity	• The biodiversity baseline field survey data is from 2017. Natural England does not consider this to be up to date. It is likely that the baseline conditions will have changed in the intervening nine years.	Rewrote 2.1.18 (TA)
	Biodiversity	• Natural England recommends that information from the relevant Local Nature Recovery Strategy or strategies should be included.	Added new subtitle 'Local Nature Recovery Strategies'
	Biodiversity	It appears that irreplaceable habitats have not been identified.	Added text to 2.1.14
	Biodiversity	• While ancient woodland has been considered, ancient and veteran trees should also be included.	Added text to 2.1.14
	Biodiversity	• Natural England agrees with the 30km study area for SACs protected for bats. However, while this is stated in the technical appendix, it appears to be missing from the scoping report (paragraphs 4.3.3 and 4.4.1)	Included

	Question 4: Do you agree with the proposed AoS Framework presented? Biodiversity	• Natural England agrees that the assessment questions for biodiversity should include consideration of the effects of noise, air pollution and water pollution. We advise that this list should also include effects arising from changes in water quantity, particularly for water-dependent habitats.	Added
	Climate change	• We recommend that the assessment questions for climate change should include the potential use of nature-based solutions.	Added
	Landscape	• We advise that the assessment questions for landscape should include consideration of the duty to further the purposes of protected landscapes, in line with the Levelling Up and Regeneration Act. This policy change should also be reflected in paragraph 9.4.2.	Added both
	Question 5: Is there anything else that needs to be taken into account in the AoS or do you have any other comments on the Scoping Report?	The Airports NPS will be unique in being specific to one site. Natural England requests clarity on the definition of an airports NSIP; whether an airport development project somewhere other than Heathrow could be considered to be an NSIP; and what the policy context would be in such a case. It would be helpful if this could be set out in the AoS and the NPS. For the AoS to be effective, the Heathrow third runway proposals will need to be in accordance with the updated NPS, with that NPS shaped by the findings of the AoS. Natural England requests clear and appropriate sequencing of policy decisions and project decisions, so that the best environmental outcomes can be achieved. This comment is made in the context of the Heathrow third runway NSIP already being in the pre-application stage.	Noted. Airport expansion (and other alternative approaches) were considered during the development of the adopted ANPS.
From: A.R., Senior Policy Advisor (National Planning) **Response received on**: 08.04.26		Given Historic England's previous engagement with the Heathrow Airport expansion scheme, the effects of expansion on the historic environment and to the significance of individual heritage assets as a result are now well understood. It remains important that these effects are properly assessed in order to avoid harm to signficance of heritage assets wherever possible and to mitigate against harm if not. We note the AoS process for the ANPS is largely iterative in that it is intended that it updates the evidence and findings relating to the	Noted

		adopted National Policy Statement (NPS) from 2018. Our comments, which are set out below, are relatively limited as a result.	
	8.1.2	Chapter 8 Historic Environment, para 8.1.2. (main report, page 45) states the chapter focusses on '..the local (Heathrow) baseline because effects on heritage assets (including their physical fabric and setting) are highly location-specific and typically confined to the immediate area around the airport'. Given the scale of the airport expansion project, including the proposed watercourse diversions and changes to roads infrastructure such as the M25, we would contend that this statement is not necessarily accurate. Furthermore, the potential noise effects consequent to a third runway and the significant increase in flights (on a different flight path to currently) could have impacts on a wide range of heritage assets some distance from the airport itself. We suggest this paragraph is amended to reflect these wider issues.	Adjusted the scope to regional
	8.2	We welcome the helpful context in relation to managing effects on the historic environment set out at section 8.2, including the emphasis on the National Planning Policy Framework (NPPF). Para 203d of the current NPPF indicates 'the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation'. In the draft NPPF version of the NPPF (December 2025) para 203d is effectively replaced by Policy HE1. In our response (pages 52-54) to Policy HE1 we suggested that plans should '..facilitate heritage conservation (including the use of	Added more text to 8.2

		assets consistent with their conservation) and promote opportunities where heritage assets can be used to support sustainable growth..' Whilst the new NPPF will not be finalised for some time it is worth ensuring that the AoS retains this emphasis on the potential positive role of the historic environment.	
	8.3	3. In relation to section 8.3 of the Current and Future Baseline Overview, we note that there are a number of different boundaries in relation to the core study area set out at para 8.3.1 when considering types of assets. While we would not fundamentally disagree with an approach that differentiates between asset types, it would be helpful to clarify how these distances have been arrived at and whether the AoS itself will adopt the same approach. Again, there are likely to be some designated assets particularly sensitive to noise that are not in close proximity to the expanded airport.	Included a new 6.1.1 (TA) to explain the distances
	8.4.1	Overall, we welcome the five Key Issues identified in para 8.4.1 and the specific mention of Kew Gardens World Heritage Site.	Noted
	8.4.1	As noted previously, the scale of the project and the way it will affect the historic environment in a number of different ways – physically in some cases, through effects on setting (including noise impacts) in others – may mean that the continued viable use of some heritage assets, for example pubs and churches, may be jeopardised. This would then increase the risk of such assets being placed on Historic England's or local authorities' heritage at risk registers. We consider this issue should be better reflected in the Scoping Report and the technical appendix. This could be achieved by amending the final bullet point in section 8.4.1 of the main report: • Heritage assets in the area face cumulative pressures from both	Amended key issue text and added two new framework supporting questions

		airport expansion and associated infrastructure construction, further development pressure in the wider airport area and climate change, which together increase the risk of vacancy, deterioration, and loss of significance. This should then be followed by a further question in 8.5 AoS Objective at section 8.5.2: • ' …increase the risk to the continued viable use of heritage assets with consequent loss of their significance?' A further question could be added as follows • '….effectively investigate, record and disseminate information about heritage assets affected by development? Such recording should be proportionate, professionally undertaken, be deposited in the Historic Environment Record, and made publicly available.'	
	12.2	• We suggest that the design chapter of the NPPF should be referenced at page 69 given its relevance to the likely impacts of airport expansion to places such as Harmondsworth.	Included 'High-quality design and the creation of well-designed places' as a key principle for the NPPF
	p71	• Reference is made (page 71) to the London Plan which includes '..policy directions on growth..' which are seen as '..relevant to multiple AoS topics'. Arguably the same could apply to policies supporting growth in local plans. Including these could provide a greater understanding of the relationship of the airport to the wider area in both economic and environmental terms.	Added some text to the Local Plans entry
	p109	• We note and welcome the inclusion of Historic England guidance and advice at page 109. We would suggest that our Advice Note 8 Sustainability Appraisal and Strategic Environmental Assessment could also be usefully be included here (please see Sustainability Appraisal and Strategic Environmental Assessment - Historic England Advice Note 8 | Historic England).	Added

	Soil 12.5.1 and 12.5.2	We do not consider that the text preceding Policy 12.5 is sufficient to ensure that Objective 12.5.1.1 will support the effective remediation of contaminated land. Nor does it clearly create opportunities to enhance soil health, restore degraded soils, or avoid disturbance of historic landfill sites, or, where disturbance is unavoidable, ensure appropriate mitigation to prevent adverse effects. There is an opportunity to strengthen the policy by setting out clearer expectations for improving soil health, including improving soil structure to support water management and carbon sequestration. We recommend that remediation focuses on reducing contaminant mass and that materials are reused where practicable. The proposed runway crosses multiple landfill sites, ranging from historic, unpermitted landfills to sites currently regulated under the Environmental Permitting Regulations. These will require a considered, site-specific remediation and mitigation strategy. Given the heterogeneous nature of landfill sites, there are no generic remediation solutions, and this should be clearly recognised in the policy approach.	Added two key issues and added extra text to 12.3.1
	Water13.5.1 and 13.5.2	This section needs to consider: https://www.gov.uk/government/publications/pfas-plan/pfas-plan-building-a-safer-future-together Existing and former airports and airfields are recognised sources of legacy PFAS contamination, posing risks to groundwater and connected surface waters. An extra bullet point should therefore support the identification, monitoring and remediation of contaminated groundwater from such sites. This is important to ensure that remediation measures prevent further deterioration of groundwater quality and avoid the mobilisation of contaminants where there is hydraulic continuity with surface water courses.	Extra supporting question added (SR 13.5.2)

	Technical Annex 12.13 Soil	This section needs to reference: https://www.gov.uk/government/publications/pfas-plan/pfas-plan-building-a-safer-future-together https://www.gov.uk/government/publications/land-use-framework	Added both
	Technical Annex 12.14 Water	This section needs to reference: The Contaminated Land (England) Regulations 2006 and https://www.gov.uk/government/publications/pfas-plan/pfas-plan-building-a-safer-future-together	Added both
	Water 13.5.2	Sustainable drainage systems (SuDs) are not formal water quality treatment facilities. If it is suspected the drainage system could be conveying contaminated water, it should not be directed to SuDs. A discharge permit may be required for the discharge of contaminated water alongside treatment. Ref: National standards for sustainable drainage systems (SuDS) - GOV.UK	Amended supporting question
	Water Section 13	Related guidance to refer to: Pollution prevention for businesses - GOV.UK A discharge permit may be required for the discharge of contaminated water alongside treatment. Ref: National standards for sustainable drainage systems (SuDS) - GOV.UK	Included references to pollution prevention / SuDS etc
	Resource and Waste	11.4.1 – We agree with key issues but would like to see early quantification/type of potentially sterilised mineral reserves, and quantities of former waste sites to be relocated/treated. Characterisation and pretreatment might be required in some cases, which would raise the issue of a need for permits and analytical capacity.	Added two new key issues

	No specific section	There are several issues that are closely related, especially around soil, contaminated land, and brownfield remediation, and with climate change mitigation and adaptation. It would be good to see these links and dependencies/opportunities, etc. highlighted.	Links have been included within the text for each relevant AoS topic. In-combination effects will also be addressed in detail in the AoS report.
	No specific section	The scoping report should explicitly include the **Natural Environment** as a theme. This should cover considerations such as contributing to the delivery of multi-functional Green Infrastructure, which also has implications beyond biodiversity across a range of themes, including climate change, air quality, water quality and so on.	The AoS retains the topic structure used for the adopted ANPS to maintain consistency, while considerations relating to the natural environment and multi-functional green infrastructure are addressed across existing topics (including biodiversity, climate change,

			air quality and water), which together fully satisfy legislative and sustainability assessment requirements. However, a sub-section on 'multi-functional green infrastructure' has been included in the biodiversity chapter (TA).

Historic England	**Question / Section**	**Comment**	**Amendments made:**
From: A.R., Senior Policy Advisor (National Planning) **Response received on**: 08.04.26		Given Historic England's previous engagement with the Heathrow Airport expansion scheme, the effects of expansion on the historic environment and to the significance of individual heritage assets as a result are now well understood. It remains important that these effects are properly assessed in order to avoid harm to signficance of heritage assets wherever possible and to mitigate against harm if not. We note the AoS process for the ANPS is largely iterative in that it is	Noted

		intended that it updates the evidence and findings relating to the adopted National Policy Statement (NPS) from 2018. Our comments, which are set out below, are relatively limited as a result.	
	8.1.2	Chapter 8 Historic Environment, para 8.1.2. (main report, page 45) states the chapter focusses on '..the local (Heathrow) baseline because effects on heritage assets (including their physical fabric and setting) are highly location-specific and typically confined to the immediate area around the airport'. Given the scale of the airport expansion project, including the proposed watercourse diversions and changes to roads infrastructure such as the M25, we would contend that this statement is not necessarily accurate. Furthermore, the potential noise effects consequent to a third runway and the significant increase in flights (on a different flight path to currently) could have impacts on a wide range of heritage assets some distance from the airport itself. We suggest this paragraph is amended to reflect these wider issues.	Adjusted the scope to regional
	8.2	We welcome the helpful context in relation to managing effects on the historic environment set out at section 8.2, including the emphasis on the National Planning Policy Framework (NPPF). Para 203d of the current NPPF indicates 'the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation'. In the draft NPPF version of the NPPF (December 2025) para 203d is effectively replaced by Policy HE1. In our response (pages 52-54) to Policy HE1 we suggested that plans should '..facilitate heritage conservation (including the use of	Added more text to 8.2

		assets consistent with their conservation) and promote opportunities where heritage assets can be used to support sustainable growth..' Whilst the new NPPF will not be finalised for some time it is worth ensuring that the AoS retains this emphasis on the potential positive role of the historic environment.	
	8.3	3. In relation to section 8.3 of the Current and Future Baseline Overview, we note that there are a number of different boundaries in relation to the core study area set out at para 8.3.1 when considering types of assets. While we would not fundamentally disagree with an approach that differentiates between asset types, it would be helpful to clarify how these distances have been arrived at and whether the AoS itself will adopt the same approach. Again, there are likely to be some designated assets particularly sensitive to noise that are not in close proximity to the expanded airport.	Included a new 6.1.1 (TA) to explain the distances
	8.4.1	Overall, we welcome the five Key Issues identified in para 8.4.1 and the specific mention of Kew Gardens World Heritage Site.	Noted
	8.4.1	As noted previously, the scale of the project and the way it will affect the historic environment in a number of different ways – physically in some cases, through effects on setting (including noise impacts) in others – may mean that the continued viable use of some heritage assets, for example pubs and churches, may be jeopardised. This would then increase the risk of such assets being placed on Historic England's or local authorities' heritage at risk registers. We consider this issue should be better reflected in the Scoping Report and the technical appendix. This could be achieved by amending the final bullet point in section 8.4.1 of the main report: • Heritage assets in the area face cumulative pressures from both	Amended key issue text and added two new framework supporting questions

		airport expansion and associated infrastructure construction, further development pressure in the wider airport area and climate change, which together increase the risk of vacancy, deterioration, and loss of significance. This should then be followed by a further question in 8.5 AoS Objective at section 8.5.2: • ' …increase the risk to the continued viable use of heritage assets with consequent loss of their significance?' A further question could be added as follows • '….effectively investigate, record and disseminate information about heritage assets affected by development? Such recording should be proportionate, professionally undertaken, be deposited in the Historic Environment Record, and made publicly available.'	
	12.2	• We suggest that the design chapter of the NPPF should be referenced at page 69 given its relevance to the likely impacts of airport expansion to places such as Harmondsworth.	Included 'High-quality design and the creation of well-designed places' as a key principle for the NPPF
	p71	• Reference is made (page 71) to the London Plan which includes '..policy directions on growth..' which are seen as '..relevant to multiple AoS topics'. Arguably the same could apply to policies supporting growth in local plans. Including these could provide a greater understanding of the relationship of the airport to the wider area in both economic and environmental terms.	Added some text to the Local Plans entry
	p109	• We note and welcome the inclusion of Historic England guidance and advice at page 109. We would suggest that our Advice Note 8 Sustainability Appraisal and Strategic Environmental Assessment could also be usefully be included here (please see Sustainability Appraisal and Strategic Environmental Assessment - Historic England Advice Note 8 | Historic England).	Added

Environment Agency	Question / Section	Comment	Amendments made:
From: Y.B., Planning Advisor, Planning Advice Team **Response received on**: 07.04.26	Question 1: Are the objectives and deliverables of the AoS clear? Biodiversity 4.2.2	'The Act also requires the preparation of Environmental Improvement Plans (EIPs) and is anticipated to be updated to ensure biodiversity net gains (BNGs) are secured through Nationally Significant Infrastructure Projects (NSIPs).'	Amended text
	Biodiversity 4.5.1 and 4.5.2	We welcome the inclusion of BNG as an AoS objective. 4.5.2 Should include: 'has a measurably positive impact on delivery of the London LNRS.'	Amended supporting question
	Air Quality	The objective is simple and technically accurate, but it is very broad and does not clearly define the airport's responsibility. Achieving air quality objectives in the Heathrow area will depend on multiple stakeholders, including surrounding boroughs. This creates uncertainty about how the airport is expected to meet the objective if others do not. It is also unclear what happens if the overall targets are not met, for example, whether the airport is still expected to continue limiting its own contributions. We suggest refining the wording to clearly set out the airport's role and distinguish between what is within its control and what depends on wider actions. This would improve clarity and remove ambiguity around responsibility and deliverability.	Objective and supporting questions amended
	Climate change (Flood Risk)	The wording in the NPPF is slightly different to 5.4.1 in terms of flood risk. We suggest where possible they use the wording from the NPPF. The wording could be: 5.4.1 (2) - 'To minimise risks to development from all sources of flooding risk and ensure resilience to climate change.'	Amended objective

	Q2: Do you consider that all appropriate and relevant policies, plans, strategies (PPSs) have been identified (Scoping Report: Technical Annex)? Are there any other issues that have not been identified within the review of the PPSs that should be considered within the AoS? Air Quality	WHO Global Air Quality Guidelines – Not legally binding, but an important benchmark. The UK is gradually moving towards these standards, and they may become more relevant over the life of a medium-term project.	Added
	(International)	We recommend reference and consideration of the Ambient Air Quality and Cleaner Air for Europe Directive 2008/50/EC	Added
	Air Quality (National)	Environmental Permitting Regulations 2016- for all regulated waste and some industrial activities- Emission limit values and emission control (Environment Assessment Levels).	Added
	Air Quality (National)	Please replace The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) with the latest version - The Air Quality Strategy for England (2023)	Amended
	Air Quality (National)	Air Pollution: Action in a Changing Climate (2010)	Added
	Air quality (regional/ local)	Air Quality Strategy: Framework for Local Authority Delivery (England)	Added
	Air quality (regional/ local)	Local Air Quality Management (LAQM) Framework .	Added
	Air quality (regional/ local)	Non-Road Moveable Machinery (NRMM). We recommend adoption of the principles of clean engine technology for building and construction. See Greater London Authority (GLA) NRMM standards for construction: Non-Road Mobile Machinery (NRMM) | London City Hall	Added
	Air quality (regional/ local)	Waste site enclosure- all new waste sites (of a certain type) should be enclosed in a building, i.e. waste transfer stations etc. Please refer to Environment Agency guidance and London Plan references: Environmental permits - GOV.UK and Policy SI 8 Waste capacity and net waste self-sufficiency of the GLA Local Plan the_london_plan_2021.pdf	Added

	Air quality (regional/ local)	- Air Quality positive- new development design and planning: Air Quality Positive (AQP) guidance | London City Hall	Added
	Air quality (regional/ local)	- National 'agent of change' policy in NPPF (para 200) and the Draft NPPF (Policy P4).	NPPF already included
	Air quality (regional/ local)	- Planning and infrastructure Act 2025- Air quality design standards for new homes.	PIA 2025 already included
	Soil	As well as the EIP, the PFAS Plan 2026 needs to be considered: https://www.gov.uk/government/publications/pfas-plan/pfas-plan-building-a-safer-future-together and https://www.gov.uk/government/publications/land-use-framework	Added both
	Resources & Waste	11.2.1 – This section mentions the NPPF in relation to minerals safeguarding. Safeguarding of waste handling and treatment capacity may also be included in waste/minerals & waste local plans, so this is worth referencing. For example: Policy SI 9 Safeguarded waste sites in the GLA Local Plan.	Text added
	Resources & Waste	11.2.3 – This section should Include reference to National Planning Policy for Waste.	Text added
	Q3: Do you consider that all appropriate and relevant baseline information has been identified (including that set out in the Scoping Report: Technical Annex)? Are there any other issues that have not been identified within the review of the baseline data in that should be considered within the AoS?Air Quality 1.1.8	There is a need to add 'hot water generation/ boiler use' to the list of industrial and operational emissions of the technical annex.	Text added

	Flood risk	We agree with the scope to include a core and extended study to account for the integrated nature of flood risk.	Noted
	5.3.2 & 5.3.5	Consideration also needs to be given to tidal flood risk.	Added extra text (para 3.1.18+19)
	Resources & Waste	9.2.3 – We challenge the assertion that Heathrow expansion would not substantially increase waste generation, even if compliant with its own waste strategy. The expansion would nearly double passenger numbers and, at a minimum, should be supported by robust, reviewed modelling of projected waste. Without this, there is a risk that other plans will lack critical data at the point of review.	This is the future baseline (i.e. without the ANPS / Heathrow expansion). No changes made.
	Resources & Waste	11.3.1 – Alongside safeguarding mineral sites, there should be a presumption in favour of using secondary aggregates, in line with circular economy principles. Given that London and the South East are major construction hubs, there is significant opportunity to support this approach.	Added text to 11.3.1. (MR)
	Resources & Waste	It should also be noted that, despite the London Plan target of 85% self-sufficiency, London remains a net exporter of waste, particularly construction and demolition waste and residual municipal solid waste.	Added text to 11.3.2. (MR) and 9.1.9. (TA). Also added extra key issue.
	Resources & Waste	11.3.2 – It should be made clearer that London remains a net exporter of waste; the Technical Annex could usefully include data on key waste streams to evidence this. This has the potential to place additional burdens on planned capacity.	Added text to 11.3.2. (MR) and 9.1.9. (TA). Also added extra key issue.
	Resources & Waste	The Technical Annex also notes that sites for managing future waste streams have not yet been identified. Experience indicates that early identification of required capacity, sites, and associated permits is critical to effective plan delivery.	Added text to 11.3.2. (MR) and 9.1.9. (TA). Also added extra key issue.

	Q4: Do you agree with the proposed AoS Framework presented? Figure 14-1: Proposed AoS Framework	As per the above comment concerning AoS objectives regarding biodiversity, the AoS should say 'has a measurably positive impact on delivery of the London LNRS.'	Amended
	Q5: Is there anything else that needs to be taken into account in the AoS or do you have any other comments on the Scoping Report? 13.5 Water / flood risk	This section should be read in conjunction with 13.5.2 which considers whether options "…result in the modification of watercourses". We understand this to include the consideration of new/modified culverts. In the draft NPPF consultation, it is proposed as part of policy F8(3) to ensure "proposals should not enclose existing watercourses…, unless there are compelling reasons to do do…" This could have a significant bearing on any proposals that require new culverts.	added new text to TA (11.1.18 and 11.2.2)
	Technical Annex 3.1.16 & 3.1.20	Consideration needs to be given to tidal flood risk, accounting for the effects of climate change. Please note that the EA's scoping response to an EIA here indicated some watercourses in the study area had a tidal influence.	Added text (3.1.17.)
	Technical Annex 3.1.16	It would be helpful to include a summary accounting for the effects of climate change. This could draw on information from the Environment Agency's Flood Map for Planning service, and the relevant Strategic Flood Risk Assessments produced by local authorities.	This is already included in 3.2.6
	Technical Annex 3.1.17	Reference should be made to the National standards for sustainable drainage systems. Reference should be made to https://www.gov.uk/guidance/pollution-prevention-for-businesses#activities-that-produce-contaminated-water:~:text=Assess%20if%20it%E2%80%99s,to%20get%20consent if activities could create contaminated water. The national standards are intended for the management of surface water that is uncontaminated. In some cases, proprietary features may need to be used instead of or as well as SuDS. Checks for requisite permits are needed: https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit.	Added text (TA 3.1.17-3.1.19)

	Technical Annex 3.1.18	The following needs to be included: - Impact on flood risk needs to be assessed. - Modifications to watercourse will need to satisfy relevant regulations including for flood risk and WFD. - Culverting should be avoided unless alternatives have been ruled out. - Will require permits/consents from relevant RMAs.	Added text (TA 3.1.20-3.1.21)
	Technical Annex 3.1.20	Planned development should assess the risk of flooding from reservoirs. This should assess the risk from reservoirs and to reservoirs as a result of development. This needs to include the effect of existing large, raised reservoirs and whether owners would be subject to any additional regulatory burdens because of development. Where new reservoirs may be proposed as part of development, consideration will also need to be give to the risk from and to reservoirs. This will need to consider the possible effects in the event of dam failure and emergency draw down. For awareness in an EIA scoping response, it was highlighted that potential measures to provide floodplain compensation may fall under the Reservoirs Act 1975.	Added text (TA 3.1.22-3.1.24)
	Technical Annex 11.1.9 Watercourses	Modifications to watercourses are likely to require additional consents and permits from the relevant Risk Management Authorities.	Added text (TA 11.1.10)
	No specific section	A credible maximum climate change scenario should be assessed, in line with the National Networks NPS (para 4.40). The allowances and guidance to follow can be found at Flood risk assessments: climate change allowances - GOV.UK It would be helpful to set out what the expected lifetime of the development is, or to consider it within its component parts. The PPG says, “The lifetime of a non-residential development depends on the characteristics of that development, but a period of at least 75 years is likely to form a starting point for assessment.” The Airports	We have added text (para 3.1.12) to address para 4.40 of the National Networks NPS. DfT to note

		NPS refers in some cases to "…design life of the asset is 60 years or greater." Consideration may need to be given to construction and operational phases of works. The climate change allowances used should reflect the timing(s) of those phases and the activities that need to consider flood risk.	comment for their own FRA.
	No specific section	Further consideration of the Water Framework Directive is likely to be needed to prevent deterioration in the status of water bodies or prevent them from achieving "good" status in the future. Section 11.2.2 could be expanded with further detail.	Added new text (TA 11.2.4)
	No specific section	Further detail on the 'integrated' nature of flood risk and how this will be assessed and mitigated would be helpful.	Added extra sub-section (3.1.33 TA)
	Soil 12.5.1 and 12.5.2	We do not consider that the text preceding Policy 12.5 is sufficient to ensure that Objective 12.5.1.1 will support the effective remediation of contaminated land. Nor does it clearly create opportunities to enhance soil health, restore degraded soils, or avoid disturbance of historic landfill sites, or, where disturbance is unavoidable, ensure appropriate mitigation to prevent adverse effects. There is an opportunity to strengthen the policy by setting out clearer expectations for improving soil health, including improving soil structure to support water management and carbon sequestration. We recommend that remediation focuses on reducing contaminant mass and that materials are reused where practicable. The proposed runway crosses multiple landfill sites, ranging from historic, unpermitted landfills to sites currently regulated under the Environmental Permitting Regulations. These will require a considered, site-specific remediation and mitigation strategy. Given the heterogeneous nature of landfill sites,	Added two key issues and added extra text to 12.3.1

		there are no generic remediation solutions, and this should be clearly recognised in the policy approach.	
	Water13.5.1 and 13.5.2	This section needs to consider: https://www.gov.uk/government/publications/pfas-plan/pfas-plan-building-a-safer-future-together Existing and former airports and airfields are recognised sources of legacy PFAS contamination, posing risks to groundwater and connected surface waters. An extra bullet point should therefore support the identification, monitoring and remediation of contaminated groundwater from such sites. This is important to ensure that remediation measures prevent further deterioration of groundwater quality and avoid the mobilisation of contaminants where there is hydraulic continuity with surface water courses.	Extra supporting question added (SR 13.5.2)
	Technical Annex 12.13 Soil	This section needs to reference: https://www.gov.uk/government/publications/pfas-plan/pfas-plan-building-a-safer-future-together https://www.gov.uk/government/publications/land-use-framework	Added both
	Technical Annex 12.14 Water	This section needs to reference: The Contaminated Land (England) Regulations	Added both

		2006 and https://www.gov.uk/government/publications/pfas-plan/pfas-plan-building-a-safer-future-together	
	Water 13.5.2	Sustainable drainage systems (SuDs) are not formal water quality treatment facilities. If it is suspected the drainage system could be conveying contaminated water, it should not be directed to SuDs. A discharge permit may be required for the discharge of contaminated water alongside treatment. Ref: National standards for sustainable drainage systems (SuDS) - GOV.UK	Amended supporting question
	Water Section 13	Related guidance to refer to: Pollution prevention for businesses - GOV.UK A discharge permit may be required for the discharge of contaminated water alongside treatment. Ref: National standards for sustainable drainage systems (SuDS) - GOV.UK	Included references to pollution prevention / SuDS etc
	Resource and Waste	11.4.1 – We agree with key issues but would like to see early quantification/type of potentially sterilised mineral reserves, and quantities of former waste sites to be relocated/treated. Characterisation and pretreatment might be required in some cases, which would raise the issue of a need for permits and analytical capacity.	Added two new key issues
	No specific section	There are several issues that are closely related, especially around soil, contaminated land, and brownfield remediation, and with climate change mitigation and adaptation. It would be good to see these links and dependencies/opportunities, etc. highlighted.	Links have been included within the text for each relevant AoS topic. In-combination effects will also be addressed in

			detail in the AoS report.
	No specific section	The scoping report should explicitly include the **Natural Environment** as a theme. This should cover considerations such as contributing to the delivery of multi-functional Green Infrastructure, which also has implications beyond biodiversity across a range of themes, including climate change, air quality, water quality and so on.	The AoS retains the topic structure used for the adopted ANPS to maintain consistency, while considerations relating to the natural environment and multi-functional green infrastructure are addressed across existing topics (including biodiversity, climate change, air quality and water), which together fully satisfy legislative and sustainability assessment

			requirements. However, a sub-section on 'multi-functional green infrastructure' has been included in the biodiversity chapter (TA).