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Rt Hon Heidi Alexander MP
Secretary of State for Transport
Airports National Policy Statement Review Team
Great Minister House
33 Horseferry Road
London
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01 September 2026

Dear Secretary of State,

Re: Draft Heathrow Expansion National Policy Statement consultation on proposed amendments

I am writing to respond formally to the consultation on the draft Heathrow Expansion National Policy Statement (HENPS).

As the Member of Parliament for Esher and Walton, I represent communities in Esher, Walton, the Dittons, the Moleseys, Claygate, Hersham, Hinchley Wood and Oatlands who live with the consequences of Heathrow's operations every day. My constituents regularly contact me about aircraft noise, air pollution, disturbed sleep and the effect these have on their children's health and their quality of life. The lived experience of my constituents must be considered before any final decision on expansion is taken.

I am concerned that the economic case for a third runway at Heathrow is far weaker than previously claimed, while the environmental, health and community costs have become clearer. The draft HENPS does not provide a sufficient framework for a decision of this consequence.

The case for expansion has not been made

Heathrow's projected contribution to GDP over the next 60 years has been revised down by 90%, with growth now estimated at just 0.05%, with growth concentrated overwhelmingly in London, and some regions projected to receive no benefit at all¹. Assessed using the Government's own [Green Book methodology](#), the scheme has a negative net present value of between £23.4 billion and £62.5 billion over 60 years². This does not amount to a compelling case for approving a project of this scale and permanence.

If the Government is serious about its goal of 'generating growth across the whole country', then there are faster, less costly and more fairly distributed ways to do so.

The environmental case against expansion has also strengthened. [Analysis by the New Economics Foundation](#) suggests that expansion would cancel out the climate benefits of the Government's Clean

¹ Heathrow Expansion Appraisal Report, Department for Transport, June 2026, p.55

² Heathrow Expansion Appraisal Report, Department for Transport, June 2026, p.55



Power Plan within five years of the new runway becoming operational³. With a third runway, UK aviation emissions are projected to reach 41 megatonnes of CO₂ a year by 2050, more than twice the Climate Change Committee's Balanced Pathway.

The Government's four tests

Air quality

The proposed air quality test is inadequate because it relies on outdated 2010 legal limits rather than current health-based standards. The Aviation Environment Federation has reported that [every monitor around Heathrow would fail against World Health Organization guidelines](#)⁴.

An expansion of this scale must not be judged against standards that no longer reflect the best available evidence about the effect of air pollution on human health. Nor does the mitigation package adequately address ultrafine particles emitted directly by aircraft engines, despite growing evidence - highlighted by the [World Health Organization](#) - of the risks they pose to communities surrounding airports.

Noise

The consultation relies on indicative flight paths produced by the Airports Commission rather than actual proposed flight paths⁵. My constituents deserve to know how they will be affected prior to any decision being taken.

Constituents have described aircraft following increasingly concentrated routes over their homes, with the frequency and intensity of the noise becoming, in their words, "extremely intrusive". Others report being kept awake for hours by full-sized passenger aircraft flying so low that, were it daylight, they feel they could read the tail numbers. Yet residents cannot tell from this consultation whether a third runway would make their situation better or worse.

No consent should be granted until detailed flight paths and noise exposure contours have been published and communities have been given a proper opportunity to assess and respond to them.

The proposed ban on nightlights between 23:00 and 07:00, is welcome. Especially given that the evidence of the physical and mental health damage caused by night flights is clear. The ban must, however, be robustly enforced and defined by actual take-off and landing times - not by departure from or arrival at a terminal. For a resident trying to sleep, what matters is when an aircraft is overhead. As one constituent wrote to me, late evening flights that are delayed 'interfere with our sleep' in a way that a purely terminal-based definition would fail to address.

Even without expansion, the Government's modelling indicates that 884,000 people around Heathrow are exposed to harmful noise levels⁶ and more than 52,000 experience sleep disturbance

³ New Economics Foundation, Airport Expansion Would Cancel Out Carbon Savings of Clean Power Plan, January 2025.

⁴ New Economics Foundation, Airport Expansion Would Cancel Out Carbon Savings of Clean Power Plan, January 2025.

⁵ New Economics Foundation, Airport Expansion Would Cancel Out Carbon Savings of Clean Power Plan, January 2025.

⁶ New Economics Foundation, Airport Expansion Would Cancel Out Carbon Savings of Clean Power Plan, January 2025.



from night flights⁷. Analysis from the Aviation Environment Federation suggests the number exposed could rise to 3.4 million people, across more than 1.5 million households, by 2055⁸, this is a 33% increase compared to the trajectory for a two- runway Heathrow. A noise test that permits that is permissive of harm of this scale is not, in my view, adequate.

Climate change

The climate test is fundamentally flawed. With expansion, UK aviation emissions are projected to reach 41 megatonnes of CO₂ a year by 2050, more than double the Climate Change Committee's Balanced Pathway in its [Seventh Carbon Budget](#). The Aviation Environment Federation estimates that the third runway alone would add around three megatonnes annually by 2050.

The Government must assess the cumulative effect of every planned and permitted airport expansion against the United Kingdom's overall carbon budgets. Assessing Heathrow in isolation disguises the true national impact and is irresponsible for a government which is committed to tackling the climate emergency.

The proposed mitigations rely heavily on sustainable aviation fuel targets - which have [recently been revised down](#) - and technological solutions that have not been proven at the scale required. It is not credible to base a mitigations package on technology which has not yet materialised.

Most concerning, perhaps, is the sequencing errors inherent to this consultation. The Government has asked the Climate Change Committee to assess the expansion's compatibility with the UK's climate commitments, but the Committee will not publish its conclusions until 9 and 16 September- after this consultation closes on 1 September. The public is therefore being asked to respond without seeing the Government's principal independent expert advice. That calls into question whether this process is truly open to evidence.

Environmental mitigation and compensation

Runway alternation may offer periods of respite, but it cannot substitute for a properly evidenced mitigation framework. Confidence is further undermined by Heathrow's decision, disclosed in written evidence to the House of Commons Transport Committee, to reduce its planned noise reduction budget from £241 million to £52 million before expansion has even been approved⁹. Measures being cut back before a single brick has been laid cannot reasonably be described as secure or deliverable.

Comprehensive noise insulation must be available to every household exposed to harmful noise levels.

⁷ CISHA Scrutiny Report 2025, p.15.

⁸ Aviation Environment Federation, Heathrow Expansion Will Cause Enormous Environmental Impacts, July 2026.

⁹ Aviation Environment Federation, Heathrow Expansion Will Cause Enormous Environmental Impacts, July 2026.



Compensation should not be, a substitute for adequate protection from harm. Paying residents to endure more noise and poorer air quality is not the same as preventing or reducing that harm.

Critical National Growth Infrastructure

I oppose designating Heathrow expansion as Critical National Growth Infrastructure (CNGI).

CNGI is a new and insufficiently tested legal designation that would create a presumption in favour of consent even where residual environmental harm remains. Such a designation should be supported by compelling evidence of genuine national benefit. With a negative net present value and projected GDP growth of only 0.05%, concentrated mainly in London, that case has not been made.

Applying an untested designation to one of the country's most contentious infrastructure proposals, apparently to ease its passage through the planning system, risks seriously undermining public confidence.

Passenger Mode Targets

Heathrow's latest published data places its public transport mode share at 45%. Although the draft HENPS proposes higher targets, it would allow passenger numbers to rise substantially before requiring a corresponding increase in the proportion using public transport. That sequencing risks worsening congestion, pollution and pressure on existing services.

The necessary improvements must be delivered ahead of additional demand and funded by the developer. Their cost must not be passed to Transport for London, local authorities or other public bodies without guaranteed developer funding.

Many of my constituents depend on South Western Railway services through the Heathrow corridor. Any expansion proposal must demonstrate, in detail, that the public transport network can support additional demand without making journeys worse for existing commuters.

Making Best Use policy

The Liberal Democrats' position is that net airport expansion should not proceed until a national capacity and emissions management framework is in place. No such framework currently exists. Updating the Making Best Use policy to enable further growth at Heathrow before that framework has been established would be premature and inconsistent with the United Kingdom's legally binding climate commitments.

Any revised policy must put those obligations at its centre and require the combined effect of every permitted increase in airport capacity to be assessed against national carbon budgets, rather than considering each airport separately.

Decision- making framework and supporting assessments



The draft HENPS does not provide an effective framework for determining development consent applications. Its climate test fails to account for the cumulative effect of airport expansion; its air quality test uses outdated standards; its noise assessment is based on indicative flight paths; and its proposed CNGI designation creates a presumption in favour of approval. Together, these weaknesses leave affected communities without adequate protection.

A National Policy Statement should provide the Planning Inspectorate with criteria that are clear, rigorous and enforceable. The [Transport Committee's inquiry into the draft HENPS](#), launched in June 2026, has highlighted many of these concerns. As drafted, the HENPS reads less like an impartial decision-making framework and more like a route towards a predetermined approval.

The supporting assessments reinforce rather than resolve my concerns. The Appraisal of Sustainability itself acknowledges, at page 8, that economic effects 'may reflect changes in where economic activity takes place rather than wholly additional growth,' and states at page 6 that 'no detailed mitigation measures have been applied as part of the reasonable alternatives appraisal,' despite identifying 'significant adverse effects' on the local environment¹⁰. Publishing that appraisal before the Climate Change Committee has completed its assessment leaves respondents without essential evidence.

Where scientific uncertainty remains about the effect of construction on protected habitats and waterways, the precautionary principle must apply. The developer must meet the burden of demonstrating that there will be no adverse effect on the integrity of protected sites. The Health Impact Analysis acknowledges potentially significant effects through noise and air pollution. Given that monitors around Heathrow would already fail WHO health-based guidelines, the existing health baseline should itself be a matter of serious concern.

A rushed and poorly sequenced consultation

Finally, I must place on record my concern about the conduct of this consultation. It was quietly launched on 18 June and closes on 1 September 2026. A consultation of such national significance, conducted largely over the summer holiday period, does not give communities, local authorities or expert stakeholders sufficient time to scrutinise extensive technical documents and submit properly considered evidence.

More seriously, the Climate Change Committee's independent assessment will not be available until after the consultation closes, yet the Government expects Parliament to vote on adopting the HENPS before the end of the year. Parliament must not be asked to take a decision of this magnitude on the basis of a rushed consultation that has denied respondents access to crucial independent evidence.

I therefore urge the Government to extend and reopen the consultation once the Climate Change Committee has reported, and to guarantee Parliament sufficient time to examine its advice before any vote takes place.

¹⁰ Appraisal of Sustainability for the Draft HENPS, Department for Transport, June 2026, pp.6 and 8.



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Net airport expansion should not proceed in the absence of a national capacity and emissions management framework. Heathrow must not be assessed in isolation from every other airport capacity decision, or from the United Kingdom's legally binding climate obligations.

My constituents deserve more than retrospective compensation for additional harm. They deserve clean air, a good night's sleep and a genuine voice in decisions that will shape their communities for generations. I urge the Government to listen to them, reconsider the draft HENPS and engage constructively with the communities already living beneath Heathrow's flight paths.

Yours sincerely,

Monica Harding MP

Member of Parliament for Esher and Walton