



Safe Landing response to the UK draft Heathrow Expansion National Policy Statement (HENPS) consultation

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Consultation: Draft Heathrow Expansion National Policy Statement (HENPS) – proposed amendments:

<https://www.gov.uk/government/consultations/draft-heathrow-expansion-national-policy-statement-proposed-amendments>

Date: 1st September 2026

Executive summary

Safe Landing welcomes the opportunity to respond to the UK consultation on the draft Heathrow Expansion National Policy Statement (HENPS).

We do not support the draft HENPS in its present form.

Our principal concern is that the draft HENPS does not yet establish a sufficiently robust policy framework to demonstrate that airport expansion can be delivered while remaining within the UK's legally binding climate budget and wider environmental obligations.

The UK Government's approach places substantial weight on the idea that there is a continuing "*clear need*" for additional Heathrow capacity. However, the need for additional aviation capacity is not the same as a demonstration that additional conventional airport capacity and air traffic can be achieved without endangering the UK's environmental targets.

This distinction is particularly important because the UK Government's own supporting evidence identifies significant adverse effects associated with Heathrow expansion. The Appraisal of Sustainability (AoS) assesses a wide range of social, economic and environmental effects, while the Heathrow Expansion Appraisal Report (HEAR) provides updated economic, connectivity and environmental analysis. The Government has therefore already recognised that expansion involves significant environmental trade-offs.

Safe Landing's principal recommendations are:

1. The Government should not approve the HENPS in its current form.
2. The "need" case should be reconsidered against the possibility that air traffic growth is likely to be constrained by climate, environmental, fuel and technology limits.

3. The four tests should be converted into genuinely binding conditions rather than broad tests whose satisfaction can be demonstrated through assumptions and mitigation measures.
4. A quantified UK aviation carbon budget should be established and subdivided into airport-specific budgets before Heathrow (and other airport) expansion is permitted.
5. Heathrow expansion should be required to demonstrate compliance with its aviation carbon budget on a cumulative basis, rather than relying primarily on forecasts of future technological improvements and alternative fuels.
6. The climate test should explicitly account for the uncertainty surrounding the availability and scalability of sustainable aviation fuels, zero-carbon aircraft, hydrogen, electric aircraft and other technologies.
7. The economic growth test should distinguish genuinely additional national economic benefits from economic activity displaced from other airports or industry sectors.
8. The designation of Heathrow expansion as Critical National Growth Infrastructure should be removed or substantially qualified.
9. Environmental mitigation should be secured through enforceable requirements, rather than being left to future development consent processes wherever the HENPS can reasonably establish minimum standards now.
10. The Government should establish a mechanism for periodically reviewing Heathrow's expansion and UK air traffic growth more widely against actual UK aviation emissions, technological progress and environmental outcomes.

Our alternative proposal is to harness UK aviation to instead deliver clean economic growth through the creation of a genuinely sustainable aviation sector, including the development and deployment of zero-carbon and hybrid-electric aircraft. However, long-haul hub airports such as Heathrow are unsuitable for these aircraft. Expanding conventional fossil fuel-dependent aviation infrastructure, before these technologies have been demonstrated, creates a substantial risk of locking the UK into a high-carbon infrastructure pathway.

Question 1: To what extent do you agree or disagree with the assessment of the need for the proposed expansion of Heathrow Airport?

Response: Strongly disagree.

The draft HENPS concludes that there remains a clear need for additional airport capacity at Heathrow. We do not consider the evidence presented sufficient to support that conclusion.

The fundamental issue is that the Government appears to treat projected aviation demand as evidence of infrastructure need, when in reality demand projections are themselves dependent on assumptions about economic growth, fares, capacity, technology, fuel availability and environmental policy.

The Government's own 2026 aviation forecasts acknowledge that passenger demand is projected to grow within the constraints of available capacity and that future emissions

depend on assumptions about technology, fuels and carbon policy. The forecasts are therefore scenarios, not evidence that all projected demand can or should be accommodated.

As an example: we have repeatedly responded through the [UK Jet Zero Strategy consultations](#) and [UK Environmental Audit Committee Inquiry on Airport expansion and climate and nature targets](#) that overly optimistic assumptions are being used for modelling the decarbonisation potential of new technologies and fuels, that we are failing to effectively carbon budget and that the levels of carbon pricing used in our industrial strategy and air traffic projections are far too low vs. the very high carbon abatement costs required for aviation (regardless of technologies or fuels used).

As a further example: the UK Climate Change Committee (CCC) were only able to ensure an aviation CO₂ reduction “balanced” pathway in their [CB7 models](#) that was consistent with UK carbon budgets by immediately applying a relatively high carbon price and rapidly ramping this up in their model. This causes a large reduction in air traffic growth vs. UK Department for Transport (DfT) and Jet Zero modelling - resulting in only 28% air traffic growth vs. 2025 which is possible within existing UK airport capacity, without expansion. This isn’t accounted for in UK DfT models because they have a remit of only modelling existing policies - and no carbon pricing policy currently exists that would be capable of effectively controlling aviation emissions.

This policy issue is particularly true for long-haul international flights to destinations outside of Europe that are covered by the incredibly weak Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) which applies to many flights from Heathrow Airport which are responsible for the majority of its associated emissions.

Resolving this issue is pivotal. The UK fundamentally needs a policy mechanism that can effectively control aviation emissions if it is to meet its legally binding carbon budgets. Once it has established and implemented such a policy, the air traffic growth will change.

The draft HENPS should therefore distinguish between:

1. demand for aviation;
2. demand that can be accommodated within environmental limits; and
3. demand that should be accommodated as a matter of public policy.

Those are three different propositions.

The current draft moves too quickly from the first proposition to the third.

Heathrow is already a highly utilised airport

The case for additional capacity is also weakened by the extraordinary efficiency with which Heathrow already uses its existing runway capacity. Heathrow handled approximately 84.5 million passengers in 2025 while operating at close to its existing aircraft-movement limit.

This demonstrates that Heathrow is a highly productive aviation asset. However, it does not automatically demonstrate that the UK should add another runway. The relevant question is

what additional economic and connectivity benefits arise from the additional capacity, whether those benefits justify the environmental and economic costs, and whether benefits could be delivered faster, cheaper and more environmentally using an alternative approach.

The "need" case should be tested against environmental constraints

The draft HENPS should therefore be amended so that the need for additional capacity is conditional upon demonstrating that the resulting aviation activity can remain within:

- the UK's carbon budgets;
- a quantified UK aviation carbon budget;
- A quantified Heathrow airport-specific carbon budget;
- legally binding air-quality limits;
- appropriate noise limits;
- biodiversity and nature-recovery obligations; and
- other relevant environmental constraints.

Until such a framework exists, the Government cannot establish whether the additional demand represented by the forecasts is actually deliverable.

We therefore recommend that the HENPS should not state that there is an unconditional "clear need" for Heathrow expansion. Instead, it should state that additional capacity may be justified only where the environmental and climate conditions required by the Government can be demonstrated and maintained.

Question 2: The four tests

2. a) Air quality

Response: Disagree with the proposed test.

Air quality should be treated as an absolute constraint rather than an impact to be mitigated after the principle of expansion has been accepted. Aviation workers, in particular ground crew, are most exposed to these air pollution and it causes us serious health impacts.

The test should require Heathrow to demonstrate that expansion will not cause or contribute to breaches of legally binding air-quality standards, including through cumulative effects from airport operations and surface access.

The assessment should also account for ultrafine particles, PM2.5 and other pollutants for which conventional nitrogen dioxide assessments may not capture the full health burden.

The Government has commissioned specific evidence on airside emissions, emissions trends and ultrafine particulates as part of the HENPS review. This evidence should not simply inform mitigation. It should determine whether expansion is permissible.

The test should therefore require:

- no breach of statutory air-quality limits;
- no material worsening of population exposure to air pollution;
- assessment of cumulative airport and surface-access emissions;
- monitoring at locations representative of the most exposed communities;
- binding operational measures where pollutant concentrations approach agreed limits; and
- an automatic mechanism to restrict airport activity if the limits are exceeded.

Furthermore, the UK Government could place a condition on expansion that Heathrow Airport should first demonstrate that it has a plan to use [“cleaner kerosene”](#) (reduced aromatic, naphthalene and sulphur fuel which produces less soot and particulate emissions when it burns) for its current operations, as well as for any future operations. This would deliver a significant reduction in air pollution and worker and community health this decade.

2. b) Noise

Response: Disagree with the proposed test.

Noise should be assessed using health-based measures rather than relying principally on population thresholds and averaged noise contours.

The Government proposes noise limits of 51 dB daytime and 45 dB nighttime in the draft HENPS.

However, communities experience aircraft noise as repeated individual events, not simply as an annualised average.

The HENPS should therefore require assessment of:

- number of aircraft noise events;
- maximum noise levels;
- frequency and duration of noise events;
- sleep disturbance;
- early-morning and late-evening exposure;
- changes in flight paths;
- cumulative exposure;
- respite periods; and
- the distribution of impacts across different communities.

The night-flight regime should be particularly stringent. A new runway should not result in a material increase in night-time exposure simply because the airport can demonstrate compliance with an annual noise metric. The test should also recognise that mitigation at individual properties cannot fully compensate for community-wide noise exposure.

Furthermore, the UK Government could place a condition on expansion that Heathrow Airport should first limit runway slots and/or provide higher landing charges for older, less efficient and noisier aircraft. This would deliver a significant reduction in noise this decade.

2. c) Climate change mitigation

Response: Strongly disagree with the proposed test in its current form.

This is Safe Landing's most significant concern.

The draft HENPS should not permit Heathrow expansion unless the Government can demonstrate, before development consent is granted, that the resulting aviation emissions can be accommodated within a quantified and enforceable UK aviation carbon budget.

Safe Landing made this recommendation [in evidence](#) to the Environmental Audit Committee in 2025. We argued that the UK should establish a UK aviation carbon budget and, where appropriate, subdivide this into airport-specific carbon budgets so that the cumulative CO₂ impact of airport expansion can be directly controlled and monitored via fossil jet fuel sales.

This would create a much more transparent and robust system.

At present, individual airport expansion decisions can be assessed independently without a sufficiently clear mechanism for determining whether the combined effect of airport expansion across the UK is compatible with the UK's climate obligations. Regardless of expansion plans, the UK also has no effective policy mechanism in place for directly controlling aviation emissions. This carbon budget system would ensure targets are met.

The problem with relying on technology assumptions

The climate case for Heathrow expansion relies heavily on assumptions about future improvements in aircraft efficiency, sustainable aviation fuels and other decarbonisation measures.

There is nothing inherently wrong with modelling technological progress. The problem is using projected future technological progress as justification for constructing infrastructure today.

There is a significant difference between:

"Technology that may reduce the carbon intensity of aviation."

and:

"The required technology will be available at the required scale, at the required price, and in the required timescales - to enable the proposed level of Heathrow Airport air traffic while remaining within the UK's carbon limits."

The second statement requires considerably stronger evidence.

The HENPS should include a "no-regrets" safeguard: expansion should only proceed to the extent that actual aviation emissions remain within a predetermined carbon budget.

If technological improvements fail to materialise, Heathrow should not be permitted simply to increase emissions beyond that budget.

Carbon budget recommendation

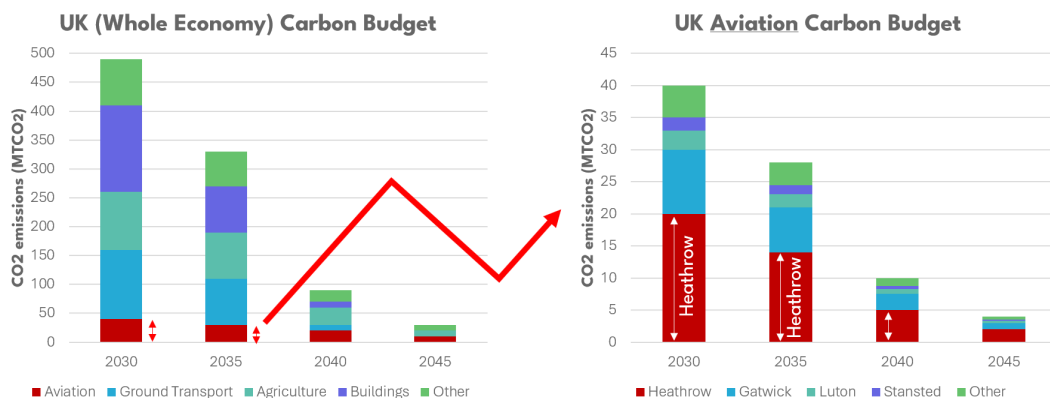
Safe Landing recommends that the Government:

1. establish a quantified UK aviation carbon budget;
2. establish a Heathrow-specific carbon budget consistent with it;
3. assess Heathrow's expansion against cumulative emissions rather than emissions in an individual year;
4. publish annual emissions performance against that budget;
5. establish binding measures to limit fossil jet fuel sales if the airport exceeds its annual carbon budget; and
6. review the budget periodically against the latest climate science and UK carbon budgets.

Our proposals - Carbon / CO₂

Create a UK aviation carbon budget (fraction of UK carbon budget):

- Create airport-specific carbon budgets consistent with this;



This would not necessarily prevent expansion. If Heathrow Airport thinks that proposed air traffic growth can be delivered within the carbon budget, then expansion could proceed.

If it does not think this, then clearly expansion should not proceed.

This is a fairer and more scientifically defensible approach than assuming that future technological progress will definitely solve the problem and reduce emissions.

It also sets the policy framework out clearly upfront, ahead of planning approval, rather than relying on policy debate in e.g. 2040, after tens of billions have already been spent and a decade or so has passed building a runway. It also incentivises decarbonisation innovation.

There appears to be a clear legal risk to the UK Government, that if Heathrow is permitted to expand and finances a third runway, only for future UK aviation policy (carbon budgets, carbon pricing, or other measures) to limit actual air traffic to levels far below projections - that they may sue for loss of revenue in an attempt to recoup the costs of the project. This could be financially ruinous for the UK economy and UK taxpayers.

Similarly, it would have massive financial impact for the airport owners, workers and wider aviation industry - which would pay for it one way or the other through cancelled contracts, job cuts for workers and increased landing charges for airlines.

Our Concerns

Let's play through a hypothetical situation:

- Heathrow gets the green light to expand and build a third runway.
- The runway opens somewhere between 2035-2040.
- The climate crisis has (inevitably) worsened.
- Other sectors of the UK economy have (very likely) failed to decarbonise as rapidly as hoped.
- The UK struggles to meet its carbon budgets.
- Aviation becomes the largest emitting UK sector.
- All focus is on us, and **stricter regulations** are applied.
- Heathrow is unable to operate at its new capacity.
- It fails to achieve its expected return on investment.
- Any economic benefits and jobs are lost.



The Airport (& investors)
Lose tens of billions in investment
May need bailed out by taxpayers
May sue UK government?

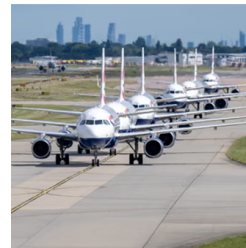


Aviation workers
Lose their jobs

This may happen anyway due to the UK's outbound tourism deficit.



UK Government
Waste 15 years.
Diverts scarce engineer/construction skilled workers.
Might need to subsidise more "SAF" – hugely expensive.
Creates economic costs rather than growth.



Aviation Industry (airlines etc.)
Must pay for this via increased landing charges



Wider society
Must pay via tax and more expensive travel – loses out on alternative options.

Non-CO2 recommendation

Furthermore, aviation's non-CO₂ also needs to be considered in addition to its CO₂ impact. The non-CO₂ warming from aviation is mostly caused by [contrails](#) (the white clouds that form behind some aircraft as they fly). Warming contrails predominantly occur from flights in Northern latitudes, during night-time and at higher altitudes - which tends to be long-range flights. Heathrow flights are therefore very likely to generate significant warming contrails.

The UK Government should place a condition that large long-haul airports (e.g. Heathrow) can only expand if we can demonstrate that non-CO₂ impacts (contrails but also NO_x, air pollution, etc.) can be quantified and effectively mitigated. This will create a positive commercial incentive for our industry to actively monitor and mitigate these impacts. As would higher landing charges for aircraft that produce higher NO_x and air pollution levels.

2d. Economic growth across the country

Response: Disagree with the proposed test in its current form.

Safe Landing recognises that Heathrow provides substantial connectivity and economic benefits. However, the economic-growth test should be considerably more rigorous.

The relevant question is not simply whether Heathrow expansion generates economic activity. Almost any major infrastructure project generates some economic activity.

The most relevant question is:

“What additional national economic value does Heathrow expansion create after accounting for displacement, opportunity costs, environmental costs and the costs of delivering the required infrastructure?”

The Government's HEAR uses updated cost-benefit analysis and wider economic modelling.

However, the Government should distinguish much more clearly between:

- genuinely additional economic activity;
- activity transferred from other UK airports;
- activity brought forward from the future;
- consumer benefits;
- producer benefits;
- employment effects;
- wider agglomeration effects; and
- benefits that depend on assumptions about future aviation demand.

The test should also account for the opportunity cost of the estimated tens of billions of pounds of private capital that could otherwise be invested elsewhere.

We therefore recommend that the economic-growth test be amended to require demonstration of **net additional national economic benefit**, rather than simply a positive economic impact. It should also ensure that any outbound tourism deficit is included.

The wider, more important point, is that if climate legislation (carbon budgets, etc.) and policies (carbon pricing, etc.) eventually limit air traffic growth - then the projections used to model and analyse these economic benefits are likely flawed. This could lead to significant negative economic impacts as outlined in the climate change mitigation section above.

Finally, the UK also has a shortage of skilled labour across engineering, construction and other technical specialisms. It must be recognised more widely that this skills shortage is already causing bottlenecks with the UK Government's existing efforts to build more homes and decarbonise the grid via its “Clean Power 2030” plans. These same skills are also required to retrofit homes with insulation and draught-proofing, replace gas boilers with heat pumps, install electric vehicle (EV) chargers and upgrade heavy industry to meet other targets. This is a key economic consideration as it drives up the cost of labour and/or requires additional government funding to train new workers and re-skill existing workers. Building a third runway at Heathrow would create a massive demand for workers with the

same skills that are currently in shortage nationally (and globally), and would create opportunity costs in diverting these skills to Heathrow and away from other critical activities.

Question 3: Are the proposed mitigation measures deliverable, effective and proportionate?

Response: Disagree.

We are not convinced that the proposed mitigation framework provides sufficient assurance that all impacts can actually be avoided or adequately mitigated.

The key problem is that mitigation is often treated as a substitute for avoiding environmental harm.

Some impacts also cannot be fully mitigated after the infrastructure has been built.

For example:

- additional aircraft noise cannot simply be compensated away;
- additional aviation emissions cannot be physically removed from the atmosphere through local mitigation;
- biodiversity loss cannot necessarily be recreated elsewhere;
- community severance and displacement cannot always be fully compensated;
- increased surface traffic cannot necessarily be eliminated through public transport mode-share targets.

The HENPS should therefore adopt a hierarchy:

1. avoid impacts;
2. minimise impacts;
3. restore impacts where possible;
4. compensate only for residual impacts.

Mitigation commitments should also be legally enforceable, independently monitored and capable of triggering operational restrictions if performance targets are not met.

Question 4: Should the ban on scheduled night flights be defined by aircraft movement rather than terminal departure/arrival?

Response: Agree, subject to stronger safeguards.

We support a clear and enforceable definition based on the actual movement of aircraft.

Communities living nearby to airports are most impacted by aviation noise, which causes significant health impacts to individuals - many of which are aviation workers themselves.

A rule based on terminal departure or arrival times could create opportunities for ambiguity or operational practices that effectively extend the period of aircraft activity.

However, the prohibition should be accompanied by:

- a clearly defined night period;
- limited and transparent exemptions;
- no routine use of exemptions;
- independent monitoring;
- publication of actual movements;
- meaningful penalties for breaches; and
- no increase in night-time noise exposure elsewhere as a consequence of operational changes.

The purpose should be a genuine reduction in night-time disturbance rather than simply a technical change in the definition of a night flight.

Question 5: Should Heathrow expansion be designated Critical National Growth Infrastructure?

Response: Strongly disagree.

We consider this proposed designation premature and potentially counterproductive.

The draft HENPS proposes to designate Heathrow expansion as Critical National Growth Infrastructure because of the Government's conclusion that there is a clear need for expansion and because of the economic and strategic benefits it could provide.

But that reasoning is circular.

The Government first concludes that Heathrow expansion is necessary, and then proposes to give the infrastructure a special policy status partly because it is necessary.

The designation risks weakening the very environmental safeguards that are supposed to determine whether the project is acceptable.

If Heathrow expansion is genuinely able to satisfy the four tests, there should be no need to pre-emptively privilege it through a Critical National Growth Infrastructure designation.

The HENPS should instead establish a robust test-based framework in which environmental constraints retain their full weight.

We therefore recommend removing the CNGI designation.

If the designation is retained, it should explicitly state that it:

- does not override climate obligations;
 - does not override air-quality requirements;
 - does not weaken biodiversity protections;
 - does not reduce the weight given to health impacts;
 - does not create a presumption that development consent should be granted; and
 - cannot be used to justify expansion where one of the four tests is not met.
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Question 6: Is compensation for affected residents fair?

Response: Disagree.

We recognise the importance of appropriate compensation for people whose homes or livelihoods are directly affected - many of which are aviation workers and our close friends, family and community.

However, compensation cannot be regarded as an adequate substitute for preventing environmental harm.

A person cannot necessarily be restored to their previous quality of life through financial compensation for:

- loss of a home;
- exposure to aircraft noise;
- sleep disturbance;
- changes to a local community;
- loss of access to green space;
- air pollution;
- loss of biodiversity; or
- changes to the character of an area.

Compensation should therefore be additional to, rather than a substitute for, effective mitigation.

The compensation scheme should also be independently assessed to ensure that it covers the full range of affected residents and that eligibility is not artificially restricted by narrow property or noise contours.

Question 7: Surface access and passenger mode-share targets

Response: Disagree with the proposed framework in its current form.

We support ambitious public transport provision to Heathrow. This is beneficial to the environment, air travellers and for aviation workers who travel to work at the airport. It is also beneficial to communities (often including aviation workers) who live in close proximity to the airport and will be negatively impacted by increased road traffic.

However, surface-access targets should be binding and sufficiently ambitious to prevent expansion from creating substantial additional road traffic and associated emissions.

The Government should publish:

- a clear baseline;
- a specific target for public transport mode-share;
- interim milestones;
- infrastructure delivery dates;
- monitoring arrangements;
- enforcement mechanisms; and
- consequences if the targets are missed.

The mode-share target should apply to passengers, airport workers and other relevant airport users rather than being narrowly defined.

Importantly, surface-access infrastructure should be operational before the full additional aviation capacity is brought into use.

The principle should be:

“No aviation capacity should be brought into operation unless the necessary sustainable surface-access capacity is already available.”

This would prevent the airport from benefiting from increased capacity while public transport infrastructure catches-up (or fails to catch-up) afterwards.

Question 8: Should the Making Best Use policy be updated?

Response: Agree that it should be reviewed, but disagree with any update that simply facilitates additional conventional aviation growth.

The Government should take this opportunity to reconsider the “Making Best Use” policy in the context of the UK’s current climate and environmental obligations.

Any updated policy should apply a consistent national framework to airport capacity.

It should assess the cumulative consequences of:

- Heathrow expansion;
- Gatwick and other UK airport expansions;
- airspace changes;
- surface-access infrastructure;
- aviation emissions; and
- future demand.

We recommend that the updated policy be based around a national UK aviation carbon budget, subdivided into airport-specific carbon budgets.

Airport capacity should then be considered within that finite environmental envelope.

This would provide a coherent basis for deciding where aviation capacity can safely grow and where constraints are necessary.

Question 9: Does the draft HENPS provide an effective framework for decision-making?

Response: Strongly disagree.

The draft HENPS provides a substantial amount of policy guidance, but it does not yet provide sufficiently clear decision rules.

The fundamental weakness is that the four tests are not sufficiently quantified.

A genuinely effective framework should allow an independent decision-maker to answer:

"Has Heathrow expansion passed the test — yes or no?"

The current framework leaves considerable room for interpretation.

We recommend that each test contain:

- a quantified threshold;
- a defined baseline;
- a specified methodology;
- monitoring requirements;
- independent verification;
- a clear compliance date;
- consequences for non-compliance; and
- a mechanism for updating the test when new evidence becomes available.

The climate test is the clearest example.

Rather than asking whether expansion is consistent with Government climate policy in a broad sense, the test should require demonstration that Heathrow's cumulative emissions remain within a defined carbon budget.

That would transform the HENPS from a framework for balancing competing aspirations into a genuine and clear environmental constraint.

Question 10: Comments on the supporting documents

We welcome the publication of the supporting assessments and consider them essential to a proper assessment of the proposed policy.

The Government has published an Appraisal of Sustainability, Habitats Regulations Assessment, Equality Impact Assessment, Health Impact Analysis and Heathrow Expansion Appraisal Report.

However, we have concerns about the treatment of uncertainty.

The assessments necessarily rely on assumptions about:

- future aviation demand;
- aircraft efficiency;
- sustainable aviation fuel;
- future energy systems;
- carbon prices;
- economic growth;
- surface-access behaviour;
- technology deployment; and
- future policy.

Where such assumptions materially affect the conclusion, the Government should publish sensitivity analysis showing what happens if those assumptions do not materialise.

In particular, the climate assessment should include scenarios in which:

- SAF deployment is slower and/or more expensive than expected;
- aircraft efficiency improvements are lower than assumed;
- zero-carbon aircraft deployment is delayed;
- Air traffic growth is higher than forecast;
- carbon prices are higher than forecast; and
- aviation policy becomes more restrictive.

A policy as consequential as the HENPS should be robust to these uncertainties.

Even better, apply actual enforceable limits, e.g. carbon budgets, on the airport - so, regardless of uncertainties and ranges of actual outcomes, targets are definitely met.

Question 11: Public Sector Equality Duty

Response: Disagree that the draft HENPS has yet demonstrated sufficient compliance with the Public Sector Equality Duty.

The Government should ensure that the distribution of impacts is fully understood, rather than relying primarily on aggregate population measures.

Environmental impacts can be highly unevenly distributed. Noise, air pollution, traffic, displacement and changes in local environments may disproportionately affect particular communities.

The Equality Impact Assessment should therefore be treated as an ongoing assessment rather than a one-off document.

The Government should require monitoring of the distribution of impacts throughout the construction and operational phases. Where disproportionate impacts emerge, mitigation should be adjusted accordingly.

Question 12: Additional comments on the draft HENPS

We consider that the most important omission from the draft HENPS is a mechanism for dealing with the possibility that aviation decarbonisation does not occur as rapidly as projected.

The policy currently risks creating a one-way commitment:

1. approve the policy;
2. construct the infrastructure;
3. allow aviation capacity to grow;
4. assume technological and fuel improvements will reduce emissions sufficiently.

A more prudent framework would create a feedback mechanism:

1. establish a carbon budget;
2. establish environmental limits;
3. approve capacity conditional upon compliance;
4. monitor actual performance;
5. restrict activity (jet fuel sales) if performance falls outside the agreed pathway;
6. permit additional growth when evidence demonstrates that it can safely be accommodated.

This approach would be consistent with the Government's stated intention that the four tests should determine whether Heathrow expansion can proceed.

A safer alternative

Safe Landing is not advocating for the UK to abandon aviation or technological innovation.

On the contrary, the UK has an opportunity to become a leader and pioneer a genuinely sustainable air travel industry.

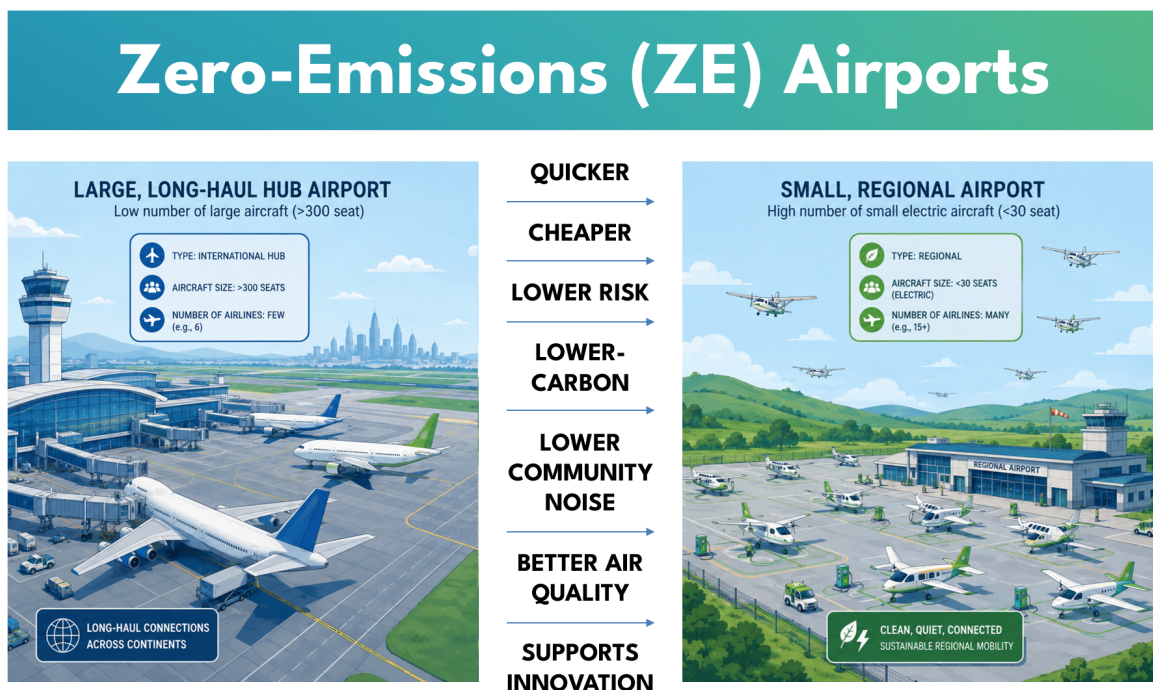
The Government should prioritise:

- contrail avoidance;
- improved airspace efficiency;
- greener, cleaner, quieter aircraft;
- zero-carbon and hybrid-electric aircraft;
- hydrogen aviation where technically feasible;
- genuinely sustainable aviation fuels where aviation has financed renewable energy;
- improved public transport access to airports; and
- research, development and manufacturing capability.

We have [previously argued](#) that any new airport runway or terminal should ultimately provide a route to genuinely zero-carbon aviation rather than simply locking in additional conventional aviation capacity. Heathrow is not well suited to such aircraft.

This would create a positive industrial strategy based on clean technological development, rather than simply a capacity-expansion strategy of conventional fossil fuel-powered aircraft.

The UK could use its aviation infrastructure to stimulate research & development and export opportunities associated with the transition to genuinely sustainable flight. This would deliver far more economic opportunity for the UK, jobs for workers and would enable us to hit the “4 tests” we are striving to achieve with our airports.



It would also benefit society, by better distributing air travel away from its current concentration around large airport hubs - towards a more regional network of airports. This could improve regional connectivity and distribute economic benefits more widely nationally.

ZE Flights – Social Benefit

ZEF will benefit people's lives:



MORE DISTRIBUTED AIR TRAVEL

- Better equality of access across UK
- Departure airport closer to home
- Congested airports/regions relieved
- Wider regional economic benefits



QUIETER FLIGHTS

- ZEF aircraft will produce less noise due to size & propulsion
- This will improve the quality of life for communities living near airports.



CLEANER FLIGHTS

- ZEF aircraft will produce less air pollution and improve air quality due to low- or zero-carbon propulsion.
- This will reduce health impacts for communities and workers at airports.

The development of key technologies for zero-emissions flight - such as high-performance electric motors, generators, batteries and control systems - would also likely have a knock-on benefit to clean technology engineering and manufacturing across the UK, creating spill-over benefits to other areas of the economy e.g. automotive.

ZE Aircraft – Economic Benefits



The UK is incredibly well-placed as a country to capitalise on its aerospace expertise and island geography to pioneer this industry, with the economic benefits this can bring.

ZE Aircraft – UK Position

The UK is well-placed to lead zero-carbon flight



- ✓ Island Geography
- ✓ Flights to Ireland & Western Europe
- ✓ UK Aerospace expertise

The Opportunity: Build the future of flight



-  Develop & support the introduction of zero-carbon aircraft
-  Create high-value jobs in engineering, manufacturing and operations
-  Position the UK as a global leader in clean aviation technology
-  Attract new tourists excited to try zero-carbon flight

These proposals are explained within this video recording of our recent community assembly on Heathrow Expansion: <https://safe-landing.org/heathrow-airport-assembly-aug2026/>

Conclusion

We do not believe that the draft HENPS should be designated in its current form.

The UK Government is right to recognise the importance of aviation to the UK economy and the importance of maintaining international connectivity. However, those objectives must clearly be reconciled with the UK's climate and environmental obligations.

As [stated by Heathrow](#) (page 3): “Aviation is a force for good in the world.” [...] “Climate is an existential threat to aviation as well as to us all personally and must be addressed” [...] “if the substantive changes that are needed haven’t been made by 2030, the industry won’t be on track for its 2050 goal. **This is the decade to make a difference.**”

The central policy question is therefore not:

“Is there demand for additional Heathrow capacity?”

There clearly is demand for air travel.

The more important question is:

“Can additional Heathrow air traffic capacity be operated within the UK’s finite environmental and climate limits, and can a policy framework to guarantee this be agreed in advance before the infrastructure is committed to?”

The draft HENPS does not yet provide a sufficiently robust answer.

The Government should therefore strengthen the HENPS before designation by:

- establishing a quantified UK aviation carbon budget;
- establishing a Heathrow-specific carbon budget;
- making the climate test a binding emissions constraint;
- strengthening the air-quality and noise tests;
- requiring genuinely additional economic benefits to be demonstrated;
- removing or substantially qualifying the Critical National Growth Infrastructure designation;
- making mitigation commitments enforceable;
- strengthening surface-access requirements, particularly for public transport;
- requiring transparent monitoring and independent verification;
- introducing consequences for failure to meet environmental conditions; and
- establishing periodic reviews so that Heathrow expansion remains conditional on actual environmental performance.

This would not result in an arbitrary prohibition on airport expansion.

It would create a clear, evidence-based test:

If Heathrow can expand while remaining within the UK's environmental limits, it should be able to demonstrate that case. If it cannot, the capacity should not be built.

That is the appropriate basis for a genuinely sustainable aviation policy.

Safe Landing therefore asks the Secretary of State to amend the draft HENPS substantially before designation and, in particular, to make compliance with quantified climate, air-quality and noise limits genuine conditions of expansion, rather than matters to be resolved (or worse, to go unresolved) through mitigation at a later stage.

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