

## Draft Heathrow Expansion National Policy Statement (HENPS)

Consultation Response

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### INTRODUCTION

1. BusinessLDN welcomes the opportunity to respond to the Government's consultation on the draft Heathrow Expansion National Policy Statement (HENPS).
2. BusinessLDN is a business membership organisation with a mission to make London the best city in the world in which to do business, working with and for the whole UK. Our members span a broad range of sectors, including financial and professional services, technology, infrastructure, transport, hospitality and the creative industries. Businesses across these sectors depend on strong global connectivity to trade, attract investment, recruit talent and compete in an increasingly competitive global economy.
3. As highlighted in BusinessLDN's recent report in partnership with Arcadis, *Pathway to Delivery: Expanding London's Global Connections*, Heathrow expansion represents one of the UK's most significant infrastructure opportunities.<sup>1</sup> As the UK's only hub airport, Heathrow plays a unique role in supporting trade, inward investment, tourism and productivity across every nation and region.
4. Heathrow has been operating at or close to capacity for a decade and a half. This limits the UK's ability to add new international routes, strengthen domestic connectivity and compete with expanding hub airports such as Paris Charles de Gaulle, Amsterdam Schiphol, Frankfurt and Dubai. Expanding Heathrow is essential if the UK is to maintain its position as a globally competitive trading nation.
5. Heathrow's proposed expansion programme represents around £33billion of private investment without taxpayer funding. It could generate around £17 billion of additional economic activity annually, improve the UK's global connectivity and create opportunities for businesses and supply chains across the country.<sup>2</sup>
6. The draft HENPS provides a strong basis for progressing Heathrow expansion. The final HENPS must seek to provide the policy certainty needed to unlock investment while

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<sup>1</sup> BusinessLDN, [Pathway to Delivery: Expanding London's Global Connections](#), February 2026.

<sup>2</sup> Heathrow, [Our Proposal for Expanding Heathrow: The UK's Gateway to Growth](#), Summer 2025.

strengthening recognition of the wider economic benefits of international connectivity, supporting complementary surface access improvements and maintaining a balanced planning framework that enables growth alongside robust environmental safeguards.

## EXECUTIVE SUMMARY

7. BusinessLDN strongly supports the draft HENPS and believes it provides the appropriate strategic planning framework for delivering additional hub airport capacity in support of the Government's aim of driving growth in every nation and region of the UK.
8. Our response is based on five principal themes:
  - **Heathrow expansion remains strategically important for the UK's economic competitiveness.** The draft HENPS correctly recognises the need for additional hub capacity to strengthen the UK's global connectivity, trade and investment.
  - **Heathrow expansion should be designated as Critical National Growth Infrastructure.** This recognises its role as nationally significant infrastructure and provides confidence to investors, delivery partners and UK supply chains.
  - **The final HENPS should better recognise the wider economic benefits of expansion.** These include export growth, inward investment, productivity, freight, regional growth and the benefits of large-scale private investment.
  - **BusinessLDN supports the balanced framework established by the draft HENPS.** Expansion must be delivered alongside robust environmental safeguards, including effective measures to address climate change, air quality, noise and sustainable surface access. The HENPS establishes the strategic framework while allowing detailed mitigation measures to be assessed through the DCO process.
  - **The Government should proceed with the timely approval of the final HENPS.** Following many years of discussion, assessment and consultation, the priority should now be to provide the policy and regulatory certainty needed to unlock investment and enable delivery of Critical National Growth Infrastructure.

## DETAILED COMMENTS

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

9. We strongly agree that there is a compelling strategic need for Heathrow expansion. The Government's assessment correctly recognises that additional hub airport capacity is essential to supporting the UK's long-term economic growth, trading position and global connectivity.
10. International connectivity is a key driver of economic success. Businesses depend on reliable access to overseas markets, customers, suppliers and investors, and connectivity is important to investment and location decisions. As the UK's only hub airport, Heathrow uniquely supports trade, tourism, inward investment and business travel across every nation and region. Heathrow already spends around £2 billion annually with UK businesses, while expansion

would unlock billions more for manufacturers, engineering firms, construction and supply chains.<sup>3</sup>

11. Heathrow has operated at or close to capacity for a decade and a half, while competing hub airports including Paris Charles de Gaulle, Amsterdam Schiphol, Frankfurt and Dubai continue to invest in additional capacity. Maintaining the *status quo* risks weakening the UK's position within the global economy as airlines, trade and investment increasingly gravitate towards better-connected international hubs. We therefore welcome the draft HENPS's recognition that failing to increase capacity at Heathrow would have detrimental consequences for the UK economy and the UK's hub status. Capacity constraints require airlines to prioritise the most commercially attractive routes, restricting global links and reducing opportunities to develop new destinations. The HENPS is also right to recognise that domestic connectivity could decline as airlines compete for scarce slots, reducing links between the UK's nations and regions and Heathrow's global network.
12. We also welcome the HENPS's recognition that the national impacts of expansion should be considered alongside environmental, social and local impacts. This should include the UK's international competitiveness and its ability to compete successfully with other global aviation hubs.
13. Expansion would strengthen the UK's global competitiveness by improving access to global markets, increasing freight capacity by around 50% and creating opportunities for more than 30 long-haul destinations.<sup>4</sup> Around 60% of the economic benefits are expected to be realised outside London and the South East, reinforcing Heathrow's role in supporting businesses across the UK.<sup>5</sup> Expansion would also strengthen domestic connectivity, with Frontier Economics identifying Belfast International, Cornwall Airport Newquay, Leeds Bradford, Liverpool John Lennon and Teesside International as among the airports most likely to gain Heathrow connections.<sup>6</sup>
14. The HENPS also correctly identifies that expansion would deliver benefits for consumers. Continued capacity constraints can reduce competition and limit passenger choice, while airports operating at full capacity have less resilience to disruption. Additional capacity would help improve passenger choice, strengthen competition and support a more resilient aviation network.

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<sup>3</sup> Heathrow, [Our Proposal for Expanding Heathrow: The UK's Gateway to Growth](#), Summer 2025.

<sup>4</sup> Heathrow, [Our Proposal for Expanding Heathrow: The UK's Gateway to Growth](#), Summer 2025.

<sup>5</sup> Heathrow, [Our Proposal for Expanding Heathrow: The UK's Gateway to Growth](#), Summer 2025.

<sup>6</sup> Heathrow, [Keeping the UK Connected: Domestic Connectivity at Heathrow](#), May 2026.

**The government has proposed four tests which must be met for expansion to proceed. To what extent do you agree or disagree with how the government has set each of the ‘four tests’?**

### **Air quality**

15. We agree with the Government’s approach to air quality and support the requirement that expansion should only proceed where statutory air quality obligations can be met. The HENPS establishes a framework requiring compliance with legal air quality limits, allowing detailed mitigation measures to be assessed through the DCO process.
16. As noted in the HENPS, based on current evidence, the Government’s conclusions on nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM10) impacts from the 2018 Airports National Policy Statement remain applicable in 2026. This supports the Government’s conclusion that Heathrow expansion can be delivered while meeting air quality obligations, subject to effective mitigation, monitoring and enforcement.

### **Noise**

17. We agree with the Government’s approach to managing noise impacts and support the requirement that expansion should only proceed alongside effective mitigation measures.
18. The HENPS should require robust noise assessment, monitoring and mitigation, alongside meaningful engagement with affected communities, allowing detailed operational measures to be developed through the statutory planning process. However, it is important that the noise baseline remains deliverable and in line with the technological and fleet progressions expected by the industry.

### **Climate Change**

19. We agree that Heathrow expansion must be consistent with the UK’s legally binding climate commitments and support the Government’s requirement that aviation growth should be delivered alongside continued progress towards net zero.
20. We welcome the HENPS assessment that, based on updated aviation forecasts and evidence on sustainable aviation fuels (SAF) uptake and efficiency improvements, achieving net zero aviation by 2050 remains feasible. However, delivering this ambition will require close collaboration across government and industry. In particular, the Government has a key role to play in supporting the development of the SAF market, including through creating the regulatory certainty, incentives and investment environment needed to accelerate commercial deployment.

### **Economic Growth**

21. We strongly agree with the Government's decision to recognise economic growth across the country as one of the four tests for Heathrow expansion. However, the final HENPS should go further in recognising that the economic value of global hub connectivity extends beyond traditional transport appraisal. Heathrow connects businesses and investors to global markets while supporting UK supply chains, infrastructure investment, skills and employment.
22. The Government-commissioned analysis indicates an increase in GDP of around 0.05% by 2056, whereas Heathrow's assessment indicates an increase of around 0.43% by 2050.<sup>7 8</sup> We recognise that the Government's model is limited, however the HENPS assumption on economic benefits are not wholly representative of expansion. The final HENPS should therefore ensure that its assessment fully reflects the wider economic impacts of expansion, including:
- improved access to international markets and emerging economies;
  - increased export opportunities;
  - increased foreign direct investment enabled by aviation connectivity;
  - productivity benefits from stronger global links;
  - Heathrow's unique role in supporting long-haul freight; and
  - the contribution of privately financed infrastructure investment to economic growth.
23. The HENPS suggests national economic effects are uncertain because some activity may reflect changes in the location of economic activity rather than wholly additional growth. Improved global links enable new trade, investment and business opportunities that would otherwise be lost to competing global hubs.
24. The final HENPS should ensure that the strategic assessment fully captures the risks of under-providing nationally important infrastructure and reflects the changing economic context, including increased global competition for investment and the UK's need to strengthen productivity, exports and growth.

**To what extent do you agree or disagree that the proposed mitigation measures for environmental impacts resulting from Heathrow expansion requirements are deliverable, effective and proportionate?**

25. The proposed mitigation measures set out in the HENPS provide an appropriate strategic framework for managing the environmental impacts of Heathrow expansion. The policy rightly identifies the environmental outcomes that expansion must achieve, while allowing detailed mitigation proposals to be developed, tested and scrutinised through the DCO process.
26. The HENPS's approach to climate change illustrates the benefits of establishing strategic policy while leaving project-specific solutions to the DCO process. Achieving net zero aviation will require continued progress on SAF, aircraft efficiency, operational improvements and

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<sup>7</sup> Department for Transport, [Heathrow Expansion Appraisal Report](#), June 2026

<sup>8</sup> Heathrow, [Our Proposal for Expanding Heathrow: The UK's Gateway to Growth](#), Summer 2025.

carbon management, alongside government support to accelerate investment and deployment.

27. More broadly, the effectiveness of environmental mitigation will depend on clear monitoring, enforcement and accountability mechanisms. The Government should ensure that mitigation measures are deliverable in practice, supported by appropriate governance arrangements and meaningful engagement with affected communities.
28. Overall, BusinessLDN considers that the proposed approach is proportionate and provides the right balance: enabling delivery of strategically important infrastructure while ensuring that environmental impacts are properly assessed, mitigated and managed through the project consent stage.

**Do you agree or disagree that the proposed ban on scheduled night flights for Heathrow following expansion should be defined based on the time a ‘plane takes off or lands’ instead of ‘departure from and arrival to terminal’?**

29. We recognise the need to balance the significant economic and connectivity benefits of night flights with the importance of providing respite from aircraft noise for local communities. Heathrow’s night flights support an estimated 57,400 jobs across the UK and contribute to business, domestic connectivity and the wider economy.<sup>9</sup> They are also particularly important for freight and trade: around 600,000 tonnes of cargo are carried on night flights in the UK, contributing an estimated £16.4 billion to the economy.<sup>10</sup> Early morning arrivals are especially valuable for time-sensitive and perishable goods and for onward connections through Heathrow.
30. We therefore support the continued recognition of these benefits alongside appropriate restrictions to manage noise impacts. The proposed approach in the HENPS appears to depart from the internationally recognised definition of a scheduled flight (ICAO), which is based on the time an aircraft departs from or arrives at the terminal/gate, rather than the time it takes off or lands.
31. Defining the restriction by take-off and landing times would effectively shorten the operational period because taxi time would be brought within the restricted period. This could reduce the number of flights able to operate, with consequential impacts on Heathrow’s connectivity and economic contribution. The impact would be particularly significant for early morning cargo and trade, where timely arrivals are critical to just-in-time supply chains and perishable goods. We therefore support retaining the internationally recognised, terminal-based definition per the ANPS to avoid unnecessarily restricting economically valuable operations.

**To what extent do you agree or disagree with the proposed designation of Heathrow expansion as Critical National Growth Infrastructure?**

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<sup>9</sup> Airlines UK, [Economic Impact of Night Flying in the UK](#), July 2021

<sup>10</sup> Airlines UK, [Economic Impact of Night Flying in the UK](#), July 2021

32. We strongly support the proposed designation of Heathrow expansion as Critical National Growth Infrastructure. The draft HENPS rightly recognises that Heathrow expansion is not simply an aviation project, but nationally significant economic infrastructure that will strengthen the UK's long-term competitiveness, productivity and international connectivity.
33. Heathrow already underpins trade, inward investment and global connectivity as the UK's only hub airport, handling around £300 billion of goods annually by value, and it is the country's largest port by value.<sup>11</sup> The airport supports around 80,000 on-site jobs plus approximately 16,000 across its UK supply chain.<sup>12</sup> Expansion would build on these strengths by unlocking significant private investment, increasing capacity and improving access to overseas markets.
34. This designation properly reflects the project's strategic importance and provides confidence that Government, regulators and delivery partners are aligned behind infrastructure that is essential to achieving economic growth. The designation also provides confidence to investors that the project is a priority for Government and that all relevant parties are focussed on ensuring timely delivery of expansion.
35. Policy certainty must also be complemented by regulatory certainty. We welcome the Civil Aviation Authority's (CAA) ongoing work to develop the long-term regulatory framework for Heathrow expansion; doing this in a timely manner will also provide confidence to investors, while ensuring efficient outcomes for passengers and airlines. As highlighted in our January 2026 consultation response to the CAA's Working Paper on Future Regulatory Models for Heathrow, a stable and predictable regulatory framework is essential if the UK is to demonstrate that it can continue to attract large-scale private infrastructure investment.<sup>13</sup> Prolonged uncertainty over the regulatory framework risks delaying investment decisions, increasing financing costs and weakening confidence in the timely delivery of expansion.

**To what extent do you agree or disagree with the requirements for surface access, including the passenger mode share targets, and the Surface Access Vision?**

36. We broadly support the approach set out in the HENPS on surface access and welcome the emphasis placed on the Surface Access Vision as a framework for ensuring Heathrow expansion is supported by a sustainable, integrated and resilient transport network. Expansion must not simply increase airport capacity; it must also improve the way passengers, workers and freight access the airport, while supporting economic growth and reducing environmental impacts.
37. The Surface Access Vision provides an important strategic framework by recognising the need to encourage greater use of public transport, active travel and lower-emission transport options. We support the requirement for a surface access strategy that incentivises mode shift

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<sup>11</sup> Heathrow, [More than a quarter of UK trade passed through Heathrow, the UK's most valuable port, in 2025](#), 8 April 2026.

<sup>12</sup> Heathrow, [Our Proposal for Expanding Heathrow: The UK's Gateway to Growth](#), Summer 2025.

<sup>13</sup> BusinessLDN, [Consultation Response: CAA Consultation on regulatory models for Heathrow expansion](#), 16 January 2026.

and prioritises environmental sustainability, while recognising that achieving these objectives will depend on the availability of the right infrastructure and investment.

38. We support ambitious passenger mode share targets, provided they are realistic, evidence-based and matched by the necessary transport improvements. Targets should be supported by deliverable measures that give passengers and workers practical alternatives to private car travel. We also welcome the move away from overly prescriptive historic commitments, including the previous “no more traffic” pledge and fixed colleague car-trip reduction targets. A more flexible approach allows Heathrow, Government and transport partners to focus on delivering the infrastructure, services and demand-management measures that will achieve genuine surface access improvements as the airport expands, rather than being constrained by fixed outcomes that may not reflect changing travel patterns or the transport network. Without sufficient investment in capacity, connectivity and reliability, there is a risk that mode-share ambitions become difficult to achieve.
39. Improved rail connectivity will be central to delivering the Surface Access Vision and ensuring Heathrow is better connected to London, the wider South East and the national rail network. Expansion should therefore be accompanied by progress on major surface access improvements, including delivery of either a Western Rail Link or Heathrow Southern Rail. The Government should play a coordinating role in securing the capital needed to deliver Heathrow Southern Rail and, recognising the regulatory constraints on investment and the wider benefits beyond airport users for communities across west and south-west London, consider the role that public investment will need to play alongside private investors in realising the scheme.
40. We also welcome the HENPS focus on reducing the environmental impacts of surface access, including measures such as zero- or low-emission vehicle charging and fuel infrastructure, emissions-based access measures and approaches to minimising air quality impacts from road freight.
41. The success of the Surface Access Vision will ultimately depend on effective coordination between Government, Heathrow, local authorities, Network Rail and private sector partners. The more flexible approach to traffic and colleague travel targets is welcome in this context, as it allows the focus to remain on practical and deliverable measures that improve connectivity, encourage sustainable travel and manage the impacts of expansion. The final HENPS should provide the policy certainty and strategic support needed to enable delivery of these improvements alongside expansion, ensuring Heathrow is better integrated with the wider transport network.

**To what extent do you agree or disagree that the draft HENPS provides an effective framework for decision-making on development consent applications?**

42. The draft HENPS provides an appropriate and effective decision-making framework on future DCO applications. It strikes the right balance between providing certainty on the strategic case for expansion while ensuring detailed environmental assessment, engineering design and mitigation measures are considered through the statutory DCO process.
43. The HENPS correctly separates the strategic decision on the need for additional hub capacity from the detailed assessment of a future application. This provides greater certainty for investors, applicants and decision-makers, while allowing appropriate scrutiny of issues including air quality, noise, climate change, surface access and community impacts.
44. The draft HENPS also provides welcome clarity that the expansion programme authorised by the DCO should be delivered as an integrated and complete scheme, reflecting the complexity of expanding an operational hub airport. The final HENPS should make clear that Heathrow Airport Limited, as the operator of the UK's only hub airport, is the appropriate body to promote and deliver that integrated scheme. Given the scale and complexity of the project, clear responsibility for design, financing, delivery and future operation will help avoid unnecessary fragmentation and provide greater certainty for investors, regulators, local communities and delivery partners.
45. We also welcome the draft HENPS provisions identifying Heathrow Airport Limited as the "appropriate person" for statutory blight purposes. This provides welcome clarity for affected communities and ensures there is a clear party responsible for addressing the consequences of development associated with expansion. The final HENPS could go further by strengthening this expectation, making clear that Heathrow should take responsibility for undertaking the necessary works and measures arising from the scheme and for working proactively with affected communities. This would provide greater certainty for those affected and support confidence in the DCO process.
46. Heathrow's role as the "appropriate person" to deliver the scheme is also supported by its established relationships across the UK's aviation and infrastructure supply chain. Businesses have worked with Heathrow over many years and have an established understanding of its operational requirements, procurement processes and delivery standards. This existing network of trusted partners provides a strong foundation for delivering a project of this scale and should be recognised as a further benefit of having a clear and integrated promoter and delivery body.
47. This certainty is particularly important given Heathrow expansion represents one of the UK's largest privately financed infrastructure programmes. A clear policy framework, combined with a single integrated promoter and clear responsibility for affected communities, will support investor confidence, supply chain opportunities and timely delivery of nationally significant infrastructure.

**Do you have any comments on any of the additional supporting documents, including the Appraisal of Sustainability (AoS), Habitats Regulations Assessment (HRA), Equality Impact Assessment (EqIA) and Health Impact Analysis (HIA)?**

48. We are concerned that the Appraisal of Sustainability adopts an overly cautious view of the national economic impacts of Heathrow expansion by suggesting that a proportion of the benefits may reflect the redistribution of economic activity rather than wholly additional growth.
49. While displacement effects should be considered, this risks understating Heathrow's role as nationally significant infrastructure, where improved connectivity can generate additional trade, investment and productivity benefits rather than simply redistribute existing activity.
50. The final Appraisal of Sustainability should therefore give greater weight to these wider economic impacts, ensuring the evidence base fully reflects Heathrow expansion's potential contribution to economic growth, as set out in Heathrow's expansion proposal.<sup>14</sup>

## CONCLUSION

51. BusinessLDN recommends that the Government:

- **Maintain the clear strategic case for Heathrow expansion**, recognising that additional hub capacity is essential to strengthening the UK's international competitiveness, connectivity and long-term economic growth.
- **Retain the designation of Heathrow expansion as Critical National Growth Infrastructure**, reflecting its national significance in supporting trade, inward investment, freight, employment and productivity across every nation and region of the UK.
- **Strengthen the recognition of the wider economic benefits of expansion** by ensuring the final HENPS better reflects the impacts of international connectivity on exports, foreign direct investment, productivity, supply chains, regional growth and the benefits of large-scale private investment.
- **Support the delivery of complementary infrastructure and decarbonisation measures**, including improved surface access through Western Rail Link or Heathrow Southern Rail, alongside continued Government support to accelerate the development of the SAF market and other aviation decarbonisation measures.
- **Maintain a robust and proportionate planning framework** that provides certainty for investors, recognises Heathrow's unique role as the UK's only hub airport, and ensures environmental, community and climate impacts continue to be addressed through the DCO process.
- **Approve the final HENPS without unnecessary delay** to provide the policy certainty needed to unlock investment and maintain momentum behind one of the UK's most significant infrastructure projects.

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<sup>14</sup> Heathrow, [Our Proposal for Expanding Heathrow: The UK's Gateway to Growth](#), Summer 2025.