

Airports National Policy Statement Review Team
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Thursday 27th August 2026

Sent via email to: henpsconsultation@dft.gov.uk

Dear Airports National Policy Statement Review Team,

Draft Heathrow Expansion National Policy Statement: [consultation on proposed amendments](#)

On behalf of the organisation, [Thames Valley Chamber of Commerce](#) (TVCC), we are providing the following in response to the government's invitation to comment on the above consultation, hereafter the HENPS.

TVCC is the only accredited Chamber of Commerce for Berkshire, Buckinghamshire, Oxfordshire, and Swindon and one of the largest of the 51 Accredited Chambers of Commerce in the British Chambers of Commerce network. TVCC has provided services and support to the Thames Valley business community as an a-political, not for profit organisation, for over 75 years. We serve over 4000 active international trade customers and members, one of the largest representations of major multinational employers and international trading SMEs in the British Chambers of Commerce network.

In preparing this submission, we have invited comments from our membership, including TVCC's [Thames Valley Assembly](#) and [Western Rail Link to London Heathrow working group](#).

TVCC has long supported the expansion of Heathrow for the reasons outlined in our submission. Most recently we highlighted this support in an [open letter to the new Prime Minister](#). Highlighted in our [ten-point plan to unlock Thames Valley growth](#) was a call to “*Back Heathrow expansion*” to drive economic growth across the whole of the UK and expedite the Western Rail Link to Heathrow (WRLtH), a fully developed scheme capable of early delivery and attracting substantial private finance to improve surface access. This will connect 20% of the UK population to the UK's only hub airport with a single interchange.

As you have requested in your consultation, where applicable, we have tried to answer your questions specifically, including consideration of the four tests government has proposed must be met for expansion to proceed. In principle, TVCC agrees with the:

- Need for expansion of London Heathrow Airport (hereafter Heathrow).
- Designation of Heathrow expansion as Critical National Growth Infrastructure

As we outline, TVCC has some specific points on climate change mitigation and economic growth across the country, which are directly linked with the urgency to prepare for and proceed with the construction of the WRLtH.

Finally, in setting out our support for the HENPS, we emphasise that HMG should:

- Recognise the compelling national case for Heathrow expansion and the economic, connectivity and employment benefits expansion will deliver across the UK.
- Support the draft HENPS as the appropriate planning policy framework for expansion.
- Support the timely designation of the HENPS to provide the policy certainty needed to unlock investment and maintain momentum behind expansion.
- Deliver on its own ambition, and guiding principles set out in the DfT's policy paper Better Connected: a strategy for integrated transport, from the outset to make public transport the first choice, minimise the impact on the road network and prioritise environmental sustainability (not wait for these to be triggered when certain thresholds are met).
- Fully commit to the integrated and timely delivery of the WRLtH scheme, before the projected passenger numbers overwhelm the transport network and before construction impacts on the M25.

Our full comments are provided below my signature.

We look forward to being kept fully updated on the progress of the HENPS in the next stages through Parliament and invite you to continue to consult, directly, with the TVCC, the largest, independent, business representative organisation in the Thames Valley.

Yours Sincerely,



Paul Britton
Chief Executive Officer

Details comments submitted on behalf of the Thames Vallet Chamber of Commerce (TVCC):

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

In principle, TVCC agrees with the need for expansion of Heathrow.

TVCC has, for many years, championed the need for improved surface access to the airport and the timely delivery of the [Western Rail Link to London Heathrow](#) (WRLtH), Through our centres of excellence, delivering inward investment and trade services for the Thames Valley, we have evidenced the value of London Heathrow, the UK's only hub airport and largest port by value, as a significant driver of inward investment, trade and UK-wide economic growth.

TVCC has been a consistent supporter of Heathrow, as the UK's gateway to growth. As we outline in our [2026 Business Manifesto](#) (see page -12-), TVCC welcomes the government's (HMG) continued support for expanding Heathrow, recognising the airport's role in delivering economic growth across the country. TVCC supports proposals that will create an airport that is fit for the future, enabling the quality service that global passengers expect, open-up new routes and unlocking benefits for the whole of the UK.

As the world's best-connected airport, the airport is a vital infrastructure asset for every part of the UK. The value of goods processed through Heathrow, every year, is greater than the UK's two largest seaports combined (with over 26% of the UK's exports, by value, going through Heathrow). Cargo capacity would be increased by an estimated 50% - with Heathrow already processing around £300bn of goods every year.

From an inward investment perspective, the airport is a significant contributory factor in why foreign owned companies (FOCs) choose to locate in the UK and [Why the Thames Valley](#) is such an attractive destination for Foreign Direct Investment (FDI). The global connectivity that the airport provides (230 destinations across 90 countries with 84 million passengers using the airport in 2025) drives FDI flows, worth billions, into the UK economy. Enhancing rail surface access from the west via WRLtH will expand the area most attractive to FDI and deliver opportunities across the whole catchment.

As the UK's largest single-site employer (over 90,000 people are employed), Heathrow is a hub for employment across the Thames Valley, London, and southeast. The wider supply-chain industries services supporting the airport generate a multiplier-effect of employment and regional growth opportunities. Heathrow already invests over £1bn a year with British businesses, expanding Heathrow would unlock billions in supply chain opportunities in every nation and region of the UK.

TVCC delivers two HMG (DfE) funded [Local Skills Improvement Plans](#). Through our work the links between business and academia evidence the importance, and vital role, key anchor institutions, like Heathrow, play in providing the skills and apprenticeship opportunities expansion creates. Expansion will provide support to British industry by strengthening the skills pipeline, and the supply chain value for crucial sectors like UK steel and manufacturing.

In addition, we highlight the following points:

- Global positioning of the UK's only hub airport: Securing UK's position as a global aviation hub competing with Amsterdam, Dubai, Frankfurt, Istanbul and Paris.
- Privately funded scheme: Current proposals for the expansion of Heathrow will support growth. Figures indicate that £33bn of private investment will be attracted for the third runway and supporting terminal assets with no taxpayer funding required (as it is entirely privately financed).
- Economic modelling: HMG's approach to economic modelling appears limited, in that it doesn't appear to capture any of the wider value from increased trade, inbound tourism or private investment into UK supply

chains, businesses and steel producers. Nor does it appear to capture the potential value to UK plc of proposed improved surface access to the airport from the west, Wales, south and Midlands.

- **Freight:** The surface access strategy (or within a dedicated supplement) should be part of a holistic approach to journeys to/from the airport, including explicit consideration of freight and operational logistics, to ensure it has equal weight in enforcement.
- **Capacity:** Expansion will increase capacity, enabling more domestic and international routes, higher frequencies on existing services, and stronger global connectivity for passengers, businesses, and UK trade. Heathrow connects to 92% of the global economy. Expansion would enhance connectivity to 30+ new routes, including underserved markets like South America, secondary cities in India and China.
- **Long-haul flights:** Expansion will bring economic and commercial opportunities of new and more frequent long-haul routes to emerging and underserved markets, supporting trade and investment, and the competitive disadvantage of losing that connectivity to rival hubs.
- **Buses and Coaches:** The proposed HENPS recognises the vital role played by buses and coaches in providing access to Heathrow for both passengers and staff. We believe the relevant sections of the HENPS (see: 5.131) would benefit from a stronger statement on the fact that buses and coaches serve slightly different target markets, therefore may require slightly different interventions to ensure an optimum service.
- **Wider economic growth benefits:** the share of benefits outside London and the Southeast, will be considerable (about 60% according to statistics included in Heathrow's expansion proposals) and help strengthen the links between the UK's nations and regions/regional airports, such as Manchester, and the global economy through the UK's only hub airport. Research from Frontier Economics identifies Belfast International, Cornwall Airport Newquay, Leeds Bradford Airport, Liverpool John Lennon, and Teesside International Airport as most likely to gain Heathrow connections through expansion. New links could unlock up to £335m in additional gross tourism spend, boosting trade, investment, and jobs. This builds on the estimated £1.2bn in gross tourism spending across the UK from travellers supported by current Heathrow domestic routes. N.B. not from the expansion proposal but Heathrow's more recent report on Domestic Connectivity.
- **Unlocking UK economic growth:** Expansion has the potential to unlock £17 billion annually for UK economy, equivalent to funding our national health service for one whole month of each year.

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

- We agree that the draft HENPS provides a clear framework for decision-making by separating the strategic need for expansion from the detailed assessment of any future development consent order (DCO) application.

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'?

- We have not direct comments on this question. However, on night flights we do believe HMG needs to provide clarity in relation to the assessment of night flights. We understand the current drafting does not fully reflect the International Civil Aviation Organisation's definition of scheduled operations and could result in uncertainty regarding the scope of the relevant policy tests.

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 document? Please also provide any further comments you may have on surface access.

- We support proposals for the delivery of improved surface access to Heathrow. However, greater clarity is needed on HMG's stance and role in delivering the supporting rail and transport infrastructure required to maximise the benefits of expansion.
- Deliver on its own ambition, and guiding principles set out in the DfT's policy paper Better Connected: a strategy for integrated transport, from the outset to make public transport the first choice, minimise the impact on the road network and prioritise environmental sustainability (not wait for these to be triggered when certain thresholds are met).
- Fully commit to the integrated and timely delivery of the WRLtH scheme, before the projected airport passenger numbers and increased workforce overwhelm the transport network and before construction impacts on the M25.
 - In section 2 of the supporting statement, [A Strategic Vision for Transport to an Expanded Heathrow Airport](#), you set out requirements on how any applicant will achieve a passenger transport mode share of (i) at least 50% when annual terminal passenger capacity is 116m or more (and 55% when this rises to 130m or more).
 - (Your own [2026 Aviation Forecast](#) [section 1.18] report indicates that, allowing for Heathrow expansion, in 2050 passengers at UK airports are forecast to reach from between 412-491m up to 510m. The average annual growth rate, your report states, varies from around 2.0% [lower range] to 2.3% [upper range] over a period 2024-2048. This compares with an observed average annual growth rate of 2.1% on the period 2000–2024).
 - According to Heathrow's own figures, they estimated these annual figures are currently around 84-85m (with summer peaks). Applying your figures and using an average annual growth rate of 2.3% we can estimate your threshold figure of 116m being met in around 13 years – i.e., no later than 2039. 130m will be reached in approximately 18 years – i.e. no later than 2044.
 - And, reflecting on the government's wider ambitions for growth, drawing on your 'High Economy' scenario (section 2.4) we should be bullish and presume passenger behaviour follows existing trends, and strong economic growth has a significant positive effect on passenger demand. Both the above forecasts would likely, therefore, be met sooner than 2039 or 2044.
 - Under long-term expansion proposals, featuring a third runway, the projected annual passenger capacity will scale up to around 150m passengers per year by approximately 2035–2040.
 - Given the timelines for the delivery of large public transport and new railway line extensions commonly stretch between 10-20 years, advancing a separate DCO for the WRLtH scheme government needs to start this process imminently, if not now.
- The way in which the draft policy and targets are constructed may encourage improvements to access from the east to be advanced, whilst delaying improvements to access from the west. We believe the targets must better reflect the commitment to serving all directions and reflect the projected increase of workforce travelling to the airport. Specifically, we would like to see an ambitious target for modal shift for passengers from the west, particularly given the projection of additional passengers from outside London and the SE within the NPS (ref: section 2.5).
- The demand and benefits of WRLtH, serving a two-runway airport, have been recognised by HMG since 2012, were confirmed in the Davies Report (of 2015), and set out in the Business Case adopted by HMG in 2019. For the reasons we have outlined in many submissions to HMG, the timely delivery of the WRLtH should be a

fundamental component of the HENPS, in helping to deliver major economic, social, and environmental benefits to 14m people across the UK.

- The WRLtH scheme has extensive support from MPs of all parties, the Welsh Assembly, local authorities, business umbrella bodies, universities, tourism bodies and numerous businesses across the catchment area. Public consultation in advance of the 2019 Business case showed that there was a significant majority of support for the proposal with minority concerns being expressed not about the link itself but about the disruption of construction and closure of a minor road. Network Rail and partners had solutions to these concerns.
- HMG states that Rail will be central to enabling the shift away from private car use, with increased capacity and resilience across the wider network. For the reasons we outline in this submission, WRLtH should be a key component and will enable a substantial shift away from private car use. The scheme will also increase the opportunities for residents from the west gaining access to the new jobs created by expansion.
- As TVCC progresses independent studies to update the [economic case](#) (which has looked into the different options for funding / financing as specified in section 2.3 of the above statement) and now the economic benefits of the WRLtH scheme, we remain disappointed that HMG (HMT/DfT) remains unable, or unwilling, to help fund this study work and so enable partners to demonstrate value to private investors. This is independent work, supported by the private sector and local government, that will help unlock substantial private investment and over £1bn, we estimate, of additional GVA. It is directly addressing your ambition to *“deliver significant enhancements to public transport services across different modes”* and ensure *“public transport and active travel should be promoted, given they provide the most sustainable options for connectivity”* to Heathrow (section 2.5).
- TVCC would also welcome HMG (HMT/DfT) support for:
 - Reducing unnecessary delays within the statutory planning framework
 - Innovation in rail construction which controls and reduces costs
 - Removal of obstacles to private investment in infrastructure

We believe we have proposals which if supported will bring benefits to other strategic infrastructure schemes

What, if any, additional comments do you have on the draft HENPS?

- The draft HENPS is supported by a substantial and well-established evidence base, building on the Airports Commission's work, subsequent HMG analysis, and extensive stakeholder engagement.
- The review appropriately updates the policy framework to reflect changes in legislation, policy, technology, and market conditions since 2018, whilst retaining continuity in the strategic assessment of airport expansion.
- The draft HENPS rightly concludes that Heathrow expansion remains the most effective means of delivering the additional hub capacity required to support the UK's connectivity, trade, and economic growth objectives.
- The draft HENPS provides a clear framework for decision-making by separating the strategic need for expansion from the detailed assessment of any future development consent application.
- The framework appropriately brings together economic, environmental and community considerations within a single policy document, providing greater clarity for applicants, decision-makers and stakeholders and ensuring that impacts and benefits can be considered in a coordinated way.

- TVCC welcome the robustness of the requirements particularly for:
 - Air quality management, including the inclusion of the impacts on areas beyond the immediate vicinity of the airport.
 - Noise reduction of aircraft, including fleet renewal to reduce, at all times, the impact on neighbouring communities.
 - Climate change mitigation, and particularly the requirements related to construction, operation and maintenance and for whole life carbon assessments.
 - Skills – and ask that measures are put in place to ensure the equitable spread of opportunity across the neighbouring local authority areas.
- We believe that HMG needs to fully recognise, and make even clearer within the HENPS, that Heathrow Airport Limited is the only stakeholder that can advance the scheme in a way that delivers for all stakeholders.

Whilst TVCC supports the draft HENPS overall, we share the views outlined by Heathrow that there are several areas where greater clarity would strengthen the policy and support successful delivery of expansion. This includes:

- The HENPS should better recognise the full economic benefits of Heathrow expansion, including the wider impacts on trade, inward investment, productivity, and economic growth across the UK which are not included in its modelling.
- Greater recognition should be given to the nationwide benefits of expansion, particularly the economic and social benefits that will be delivered outside London and the Southeast.
- The policy should better recognise the role of private investment and economic regulation in enabling Heathrow expansion.
- The HENPS should more clearly recognise Heathrow's unique role as the UK's only hub airport and distinguish this from additional capacity at other airports.
- Greater recognition should be given to Heathrow's role in supporting UK trade and freight, including the importance of long-haul connectivity. The HENPS should better recognise Heathrow's unique role in supporting UK trade and freight, including that long-haul belly hold freight capacity is a distinctive benefit of a hub airport and cannot be replicated elsewhere.
- The HENPS should continue to recognise the complexity of expanding and operating the UK's only hub airport simultaneously, ensuring the planning framework supports delivery at pace.