

Pre-Application Programme Document V5
Expansion of Heathrow Airport (Third Runway)
September 2026

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1 Introduction

- 1.1 This updated Pre-Application Programme Document (v4) supports the proposed application for development consent by Heathrow Airport Limited (HAL) (“the Applicant”) for the Expansion of Heathrow Airport (Third Runway) Project (the “Project”) at Heathrow Airport. It updates an earlier version submitted to the Planning Inspectorate (“PINS”) on 24 August 2026.
- 1.2 The Project has been registered with the Planning Inspectorate and given case reference TR020003¹. This Programme Document is produced to assist PINS to resume the pre-application process for the Project.
- 1.3 The Project involves the construction of a new runway and terminal infrastructure that will increase the capability of Heathrow Airport to provide air passenger transport services by more than 10 million passengers per annum (mppa). The Project therefore includes airport-related development that is a Nationally Significant Infrastructure Project (NSIP) under sections 14(1)(i) and 23 of the Planning Act 2008 (“PA 2008”). The Project also encompasses highway-related development, including proposals to divert the M25 motorway, which is classified as an NSIP under sections 14(1)(h) and 22 of the PA 2008.
- 1.4 In January 2025, the Chancellor of the Exchequer announced the Government’s support for the expansion of Heathrow Airport with the addition of a third runway:

“I have always been clear that a third runway at Heathrow would unlock further growth, boost investment, increase exports, and make the UK more open and more connected as part of our Plan for Change. And now the case is stronger than ever because our reforms to the economy - like speeding up our planning system, and our strengthened plans to modernise UK airspace - mean the delivery of this project is set up for success. So I can confirm today that this Government supports a third runway at Heathrow and is inviting proposals to be brought forward by the summer.”²

- 1.5 Support for the principle of the Project is also contained in the Airports National Policy Statement (ANPS), designated on 26 June 2018. The ANPS confirms that there is a national need for additional hub airport capacity in the South East of England and that the Heathrow North West Runway Scheme is the most effective and appropriate way of meeting the needs case. The policies in the ANPS have effect in relation to the Heathrow North West Runway scheme, having a runway length of at least 3,500m and enabling at least 260,000 air transport movements per annum³. It also has effect in relation to terminal infrastructure associated with the Heathrow North West Runway scheme and the reconfiguration of terminal facilities in the area between the two existing runways at Heathrow Airport. Since the publication of the ANPS the Project has been renamed the Expansion of Heathrow Airport (Third Runway) Project and this is the project name used throughout this document.

¹ PINS NSIP project page

² Chancellor’s Announcement of support for Heathrow Expansion

³ ANPS paragraphs 1.15 and 4.3

- 1.6 In June 2026 the Government commenced a consultation on proposed amendments to the 2018 ANPS. This includes changing the name of the ANPS to the Heathrow Expansion National Policy Statement (HENPS) to better reflect its purpose. The proposed draft revision to the ANPS contains policies which will have effect in relation to the Heathrow North West Runway scheme, having a runway length of up to 3,500m and enabling at least 260,000 air transport movements per annum⁴. It also has effect in relation to new terminal infrastructure or reconfiguration of terminal facilities associated with the Heathrow North West Runway scheme, and associated infrastructure, surface access facilities and changes to the strategic road network. Over the course of the summer, Heathrow reviewed the proposed amendments to the ANPS and considered the potential implications for its preferred scheme and accompanying assessments. The consultation concluded in early September. The requirements of the ANPS continue to be referenced in our work together with any potential changes arising from the proposed amendments, recognising that current policy remains the starting point for the consideration of the Project until the amendments to the ANPS have been finalised and the amended version published as the HENPS.
- 1.7 A revised National Networks NPS (NNNPS), the relevant national policy statement for highways infrastructure, was published on 24 May 2024⁵. The NNNPS is relevant to some highway components of the Project.

The Pre-Application Programme Document

- 1.8 This Pre-Application Programme Document sets out the proposed approach and programme for the pre-application engagement with PINS. It sets out planned events / milestones and related timescales to aid and inform activities and resource-planning in connection with the Project. It is based on the Applicant having moved to the enhanced pre-application service on 1 October 2025.
- 1.9 Where appropriate, we have indicated a wide meeting window that will help the Inspectorate manage its resources most effectively, including assigning a pre-application Examining Inspector. This can be narrowed/date agreed subsequently with the case team. The Document enables those engaged in the pre-application process, especially statutory consultees and local authorities, to understand the relevant timescales and ensure their contribution is programmed into the pre-application stage at the most effective point.
- 1.10 The Programme Document has been prepared having regard to the Ministry for Housing, Communities and Local Government (MHCLG) guidance 'Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects'⁶, as well as relevant advice issued by PINS in the 'Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus'⁷, as amended on 22 October 2025.
- 1.11 On 3 July 2026⁸, the Government published new National Infrastructure Planning Guidance under the Planning Act 2008, including guidance on preparing development consent

⁴ HENPS, paragraph 1.9.

⁵ NNNPS

⁶ Guidance on the pre-application stage for NSIPs

⁷ Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK

⁸ Planning Act 2008: Introduction to National Infrastructure Planning Guidance (July 2026) - GOV.UK (Note: NOT an exhaustive list of updated guidance)

applications and the pre-application stage. The guidance supports implementation of reforms introduced through the Planning and Infrastructure Act 2025, including the move away from prescriptive statutory pre-application consultation requirements towards a more flexible, proportionate and outcomes-focused approach to engagement. The Applicant has reviewed the guidance and will continue to have regard to it in developing its consultation, engagement and application programme.

- 1.12 This Pre-Application Programme Document has been prepared having regard to the current DCO framework (e.g. legislation, guidance, policy and legal principles) as at the date of the latest version of the document. The Pre-Application Programme Document will be updated by the Applicant as necessary up until the submission of the application for development consent.
- 1.13 The major DCO process reforms commenced on the 24 July 2026 under the latest commencement regulations.
- 1.14 This Pre-Application Programme Document is published on the Applicant's project website.

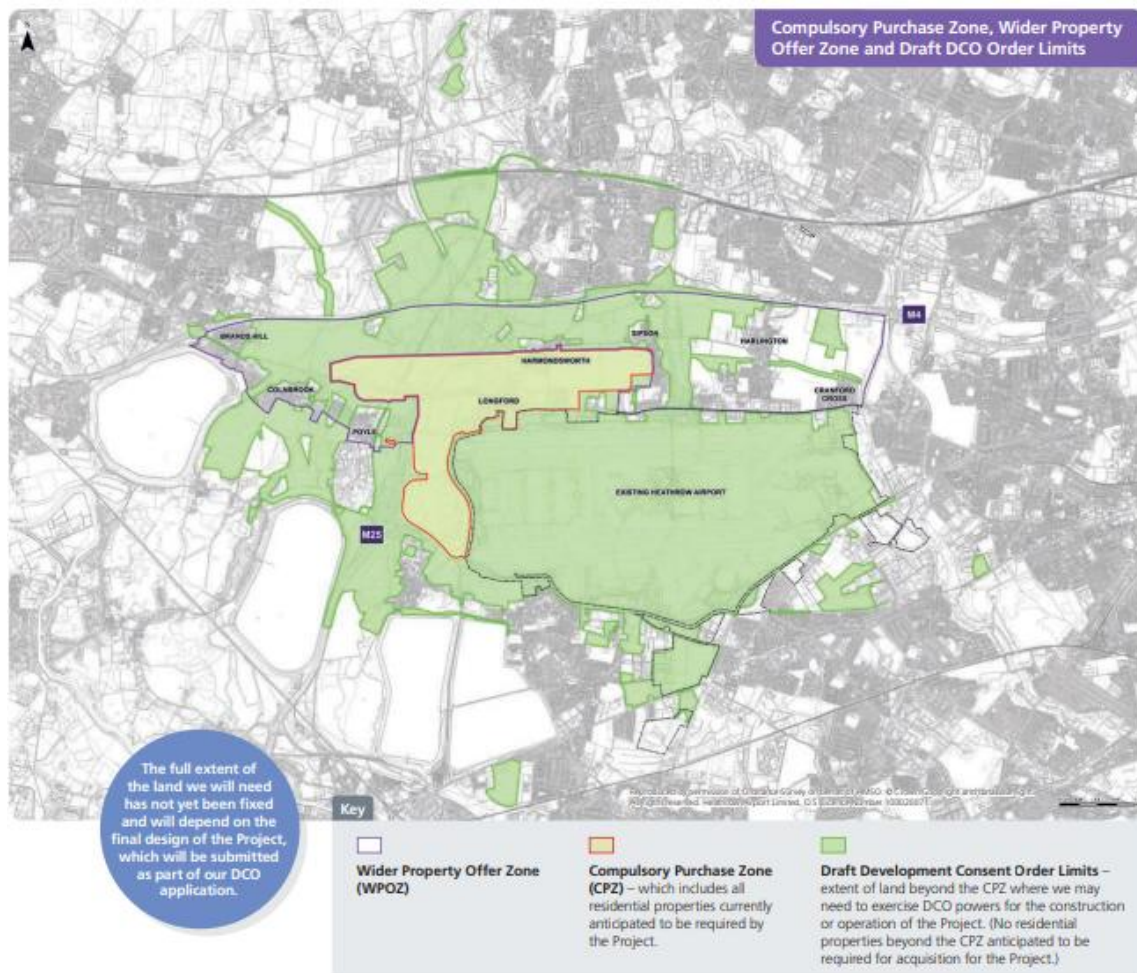
2 Project Description

2.1 The description of the Project remains as it was in 2020:

“Expansion of Heathrow Airport to enable at least 740,000 air traffic movements per annum and including a new runway to the north-west of the existing airport; supporting airfield, terminal and transport infrastructure; works to the M25, local roads and rivers; temporary construction works, mitigation works and other associated development.”

2.2 The Project draft Order Limits were shown in the statutory consultation carried out by the Applicant from June to September 2019. Figure 1 below is taken from the consultation document⁹, which shows the draft Order limits (as well as the compulsory purchase zone and wider property offer zone) as understood at that time.

Figure 1: Draft Order Limits (June 2019)



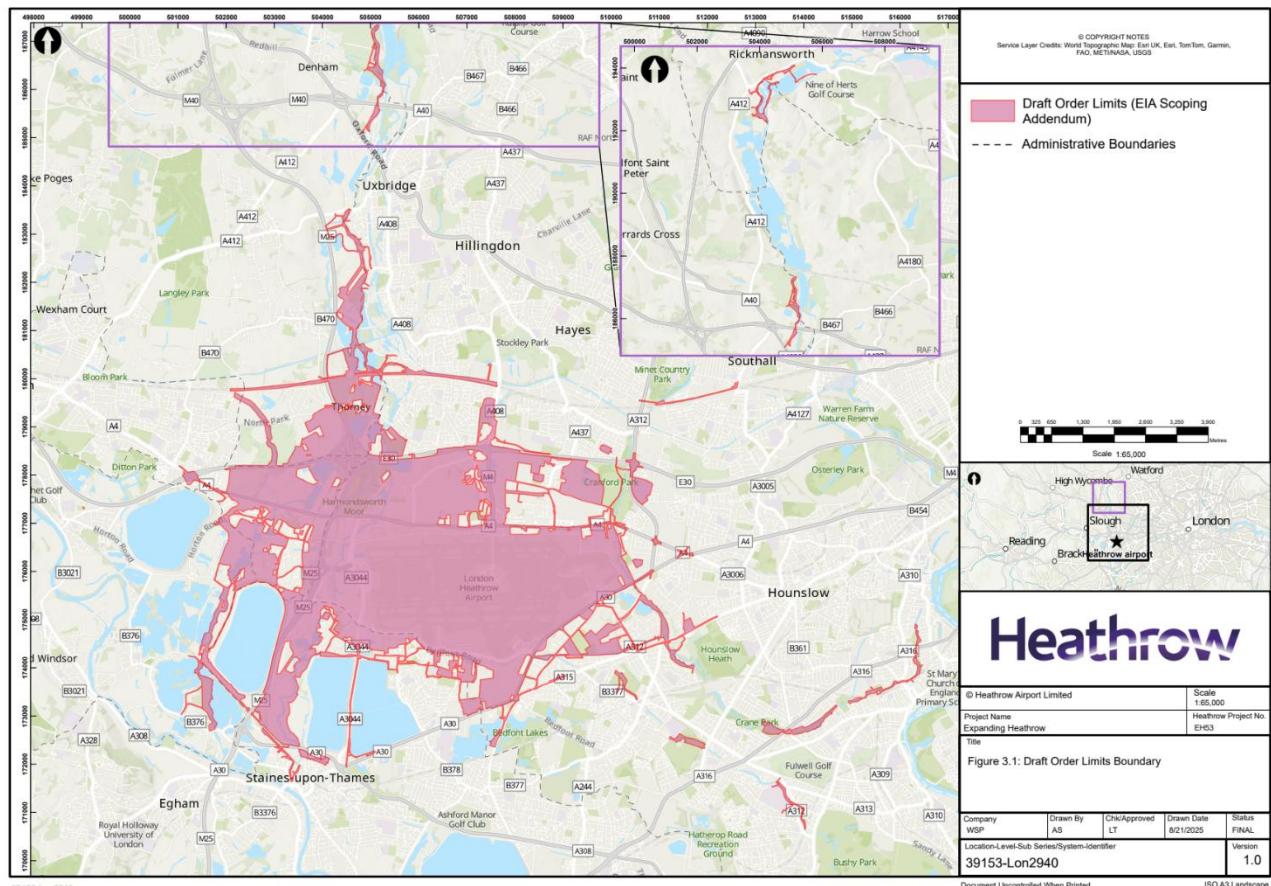
2.3 An updated version of the Project draft Order Limits was submitted to PINS on 1 September 2025 as part of the Applicant's EIA Scoping Report Addendum ("the EIA Scoping Report

⁹ Heathrow Airport Expansion Consultation Document June 2019

Addendum”). Figure 2 shown below is Figure 3.1 in the EIA Scoping Report Addendum (noting that this refers now to the ‘draft Order Limits’)¹⁰. The differences between Figure 1 above and Figure 2 below are explained in chapter 3 of the EIA Scoping Report Addendum.

- 2.4 As with all aspects of the Project, the draft Order Limits may be subject to refinement as the Applicant continues to develop its DCO application, responds to consultation and engagement and proceeds through the pre-application stage to submission.

Figure 2: Draft Order Limits (September 2025)



- 2.5 The Project comprises the following main components:

- **A third runway** of 3,500 metres, approximately 1km to the north west of the existing northern runway
- **Related runway infrastructure**, including additional taxiways
- **New terminal and satellite infrastructure**
- **An expanded Terminal 5 campus**

¹⁰ EIA Scoping Report Figures (September 2025)

- **A realigned M25 Motorway and associated junction improvements, and changes to the road network**
- **Improvements to active travel and public transport infrastructure, as well as parking infrastructure**
- **Enhancement of airport supporting development**, which includes operational and commercial facilities within and around the airport
- **Diversions to rivers**, including creating opportunities for significant enhancements to the local water environment
- **Safeguarding of land for displaced land uses and community facilities**
- **Construction phase works**

2.6 The Project also includes a range of proposals regarding changes to the operations of the airport, environmental mitigation / enhancement measures and the management of effects on local communities.

2.7 Heathrow has historically safeguarded land to support the development of rail infrastructure, including proposals for a Western Rail Link and/or a Southern Rail Link to Heathrow. Any rail scheme will not form part of the Expansion of Heathrow Airport DCO.

3 Pre-Application Timetable

- 3.1 Consistent with Ministerial announcements, the Applicant has resumed the DCO pre-application process with a view to its application being determined in this Parliament.
- 3.2 On 15 January 2026 Heathrow Airport Limited issued a press release¹¹ confirming “approved new investment to begin work on a planning application for a third runway”. The press release recognises “the Government has set the timetable to secure planning permission by 2029 and bring a third runway into operation in a decade”.
- 3.3 The Applicant is building on the extensive work already undertaken to define, assess and consult upon the Project. It is reviewing what is proposed for the Project, in light of changes in circumstances, including legislative, policy and guidance updates, in addition to the feedback already received in response to pre-application consultation and stakeholder engagement.
- 3.4 The principal milestones and key dates during the pre-application stage are provided in Table 1 below. These milestones and dates are subject to periodic review.
- 3.5 The Applicant’s view is that the Project and scope of supporting information will need to be refreshed and refined to take into account the pause since 2020. The Applicant has resumed engagement with statutory consultees, stakeholders and the community. A further round of consultation will be undertaken in October 2026 through to December 2026 to ensure that the DCO application to be submitted is informed and shaped by up-to-date data and feedback¹².
- 3.6 As referred to above, the Applicant submitted an EIA Scoping Report Addendum to PINS on 1 September 2025. The EIA Scoping Report Addendum is intended to supplement and be read alongside the Applicant’s EIA Scoping Report (submitted on 21 May 2018) (**the 2018 Scoping Report**)¹³ and the Scoping Opinion (adopted by the Secretary of State on 29 June 2018) (**the 2018 Scoping Opinion**)¹⁴. The Secretary of State issued an Addendum Scoping Opinion on 10 October 2025 which should be read in conjunction with the 2018 Scoping Report and the 2018 Scoping Opinion.
- 3.7 A number of legislative and policy changes have taken place during the pre-application stage of the Applicant’s DCO application, including implementation of relevant provisions of the Planning and Infrastructure Act 2025, which received Royal Assent on 18 December 2025, by secondary legislation and guidance. A revised ANPS was recently consulted on and closed in early September 2026 with an amended ANPS (renamed HENPS) expected to be published by the end of 2026. During the autumn of 2025, the Civil Aviation Authority conducted a

¹¹ Heathrow press release

¹² Heathrow consultation 2026

¹³ EIA Scoping Report Volume 1 Main Report (May 2018)

¹⁴ The Planning Inspectorate Scoping Opinion (June 2018)

consultation on the airspace change process. The Expansion of Heathrow DCO and programme will run alongside the airspace change process and programme.

- 3.8 Each is likely to have implications for the pre-application stage of the DCO to varying degrees. Some of the dates in Table 2 below are based on assumptions around the timing of these developments and activities. Therefore, the events / milestones outlined below, including the content of the meetings, and scheduled timings may need to be altered and updated to reflect changes to the legislative and policy framework as well as Project developments. The Applicant will liaise with the Inspectorate on this matter as and when necessary, to assist PINS with its resource planning.
- 3.9 Table 3 below (Design, Delivery, Consents and Operations Programme) forms a core part of Heathrow's enhanced engagement with PINS under the Enhanced Tier Service. It provides a transparent forward plan of the technical material that will be prepared and shared with the Inspectorate during the pre-application period. The structured forward plan is intended to support PINS in scheduling meetings, identifying which design components are suitable for early advice, and ensuring that all necessary scheme information is developed to a level appropriate for pre-application review.

Table 1: Key pre-application events and milestones (all dates in the future are indicative)

Event / Milestone	Date
Statement of Community Consultation (SoCC)	2016 / 2017
Airport Expansion Consultation One and Airspace Principles Consultation (non-statutory)	January to March 2018
Airport Expansion EIA Scoping Report	May 2018
2018 Scoping Opinion	29 June 2018
Airspace and Future Operations Consultation (non-statutory)	January to March 2019
Section 46 notification	17 June 2019
Airport Expansion Consultation (statutory)	June to September 2019
Issue Programme Document to PINS	March 2025
PINS Inception Meeting	April 2025
PINS Project Update Meeting	June 2025
HAL Consents Team host PINS Environmental Team for Project briefing and site visit around the operational boundary and draft Order Limits	August 2025
EIA Scoping Report Addendum submitted to PINS	1 September 2025
Enhanced Pre-Application Service with PINS commences	October 2025
Scoping Opinion issued by PINS	10 October 2025
Issue Programme Document V2 to PINS	October 2025
HAL confirms mobilisation of Heathrow Expansion	January 2026
HAL Consents Team host PINS Pre-Application Case Team for a site visit around the operational boundary and draft Order limits	January 2026
Issue Programme Document V3 to PINS	March 2026
Issues Programme Document V4 to PINS	August 2026
Issues Programme Document V5 to PINS	September 2026
Project consultation	27 October 2026 – 22 December 2026
Further PINS meetings to be determined for 2027	October 2026 onwards
PINS Draft DCO Application Documents Review	June 2027
DCO Application Submission	November 2027

Table 2: Engagement plan, meetings and subject matter

Meetings and subject matter	Date
Scheme Overview & Pre-application Issues Tracker	December 2025

Joint Evidence Base and Infrastructure Study (JEBIS) and Airspace Change Process and interaction with Development Consent Order.	January 2026
Application Document Structure (for information)	March 2026
Approach to consultation and scope of materials, Design Vision and overview of changes.	April 2026
Surface Access Assessment & Assumptions, Approach to design flexibility & scheme development report.	May 2026
Tripartite Meeting with the Civil Aviation Authority (CAA)	June 2026
Introduction on approach to Environmentally Managed Growth (EMG)	June 2026
Environmental Engagement update, Design and approach to terminal design, Introduction to emissions issues (UFP)	July 2026
Approach to consultation update, Approach to Land & Rights Negotiations Tracker (to issue material prior to meeting)	September 2026
Consultation material share, Design Approach to associated development (airport related development, heritage assets and re-located community facilities). Share Community Consultation Strategy.	October 2026
Earthworks, Materials Management and Approach to Permitting, Approach to scrutiny groups/ bespoke bodies/ determination panels for the monitoring of DCO effects, discharge of consents, proposed operational approach, Design principles and codes.	November 2026
Position on displaced uses, community facilities and schools Approach to construction layout and logistics	December 2026
Design Approach to Surface Access Components, Design Approach to Blue & Green Infrastructure	January 2027

Table 3: Enhanced Tier – Design Components and Progress

Topic Area	Component/ Document	Purpose	Expected Delivery	Current Status	Notes/ Dependencies
DESIGN	Works and Land Powers Approach	Present volumes proposed and tile sheets	Presentation formal.	Preparing presentation	Tile Set cut down Drawing template.
DESIGN	Project Scheme Brief [Document] Design Vision & Principles/ design narrative [Document]	To set out Heathrow wide project vision and principles.	Design Vision and Principles were presented at the April 2026 meeting.	Presented in April 2026	None.
DESIGN	Design overview and walkthrough with principal changes since project pause.	Present design for PEI and main areas of change incorporated within the scheme	Design Overview and principal areas of change were presented at the April 2026 meeting.	Presented in April 2026	The March 2026 scheme chill for the purposes of carrying out environmental work for the Environmental Information Consultation Report.

DESIGN	Flexibility Approach and Design Delivery	To set out approach to flexibility and continuance through to delivery	Flexibility approach was presented in May 2026.	Policy and approach in development	Governance and delivery strategy
DESIGN	Scheme Development Report write up	To set out approach to scheme development report	Presented in May 2026.	In development through review of old material	Governance
DESIGN	Airfield Layout and Terminals – Design and Associated Codes	To set out airfield design and approach to terminal design	Design and approach to delivery for these components were presented in July 2026.	Airfield and terminal layout confirmed for purposes of the Environmental Information Consultation Report. and upcoming consultation.	None
DESIGN	Surface Access, Highway and Transport Design and Utilities	To set out design approach for surface access including car parks	Design and approach to delivery for these components can be presented in late 2026/ early 2027.	Completion of consultation.	Option selection for car parks
DESIGN	Blue and Green Infrastructure approach	To set out design approach for Blue, and Green Infrastructure	Design and approach to delivery for these components can be presented in late 2026/ early 2027.	Completion of consultation.	Option Selection for Flooding, FF and other aspects
DESIGN	Communities, Heritage, ARD and Decants	ARD sites including community	Design and approach to delivery for these components can be presented in October 2026.	Completion of consultation.	Option Selection for Flooding, FF and other aspects
DESIGN	Presentation of Consultation Materials	Set out design for con	October 2026.	In development	Con deliverables
DESIGN & DELIVERY	Earthworks, Materials Management and Approach to Environmental	Set out approach	November 2026.	In development	CSS Evaluation (as could determine logistic changes etc)

	Permitting, Licences and Consents				
DELIVERY	Construction Support Sites and Overall Logistics Approach	Set out layout of construction and activities associated with this	Presentation in November. Also related to earthworks and logistics so coherent to present as one.	In evaluation	CSS Evaluation
CONSENTS DELIVERY	Control Hierarchy and Post DCO consenting approach	To set out the strategy for identifying and obtaining all other required permits, licences and consents	Presentation in November following completion of and release of Draft CoCP for consultation.	Stakeholder engagement is further informing strategy	PLC Strategy
OPERATIONS	Proposed Operational approach	To explain how operational matters would be secured in the DCO	November 2026	Approach to describing operations remains under discussion.	None

4 Stakeholder Engagement and Consultation

- 4.1 The Applicant undertook extensive scheme development, consultation and engagement work over a period of many years in the lead up to 2020.

Consultation

- 4.2 The consultations undertaken on the Project to date are:
- Airport Expansion Consultation One and Airspace Principles Consultation (January to March 2018) (non-statutory)
 - Airspace and Future Operations Consultation (January to March 2019) (non-statutory)
 - Airport Expansion Consultation (June to September 2019) (statutory)
- 4.3 These consultations presented consultees with options for scheme development and detailed information on the Project. Feedback was received and fully considered and taken into account, as appropriate. For the purposes of the PA 2008, the June to September 2019 Airport Expansion Consultation was the formal statutory consultation on the Project. An overview of this consultation will be published over the course of Autumn 2026.
- 4.4 The Applicant is to undertake a further round of consultation from 27 October 2026 until 22 December 2026, over eight weeks. Regard will be given to both the Planning and Infrastructure Act (PIA) and resulting guidance which came into force 24 July 2026.
- 4.5 The Community Consultation Strategy (CCS) sets out the Applicant's proposed approach to consulting local communities as part of the 2026 Public Consultation. The Applicant issued a draft Community Consultation Strategy (CCS) in May 2026 to Local Planning Authorities for comment. The updated CCS will be shared in October 2026. The Planning and Infrastructure Act 2025 (PIA 2025) removes the statutory requirements to undertake pre-application consultation, including with the local community under section 47. The Applicant's approach to the 2026 Public Consultation has been designed to reflect the Government's ambition to streamline the delivery of nationally significant infrastructure.
- 4.6 The Applicant will prepare and submit a report as part of the DCO application, which will explain how consultation feedback was taken into account and informed the development of the Project.

Engagement

- 4.7 The Applicant undertook extensive engagement with a wide range of statutory and non-statutory stakeholders, including through community engagement forums, over the course of the Project's development in the lead up to 2020. This included significant engagement with stakeholders on the scoping and preparation of the EIA, as well as in relation to the design and development of proposals of relevance to local residents and businesses.

- 4.8 The Applicant has recommenced its engagement with relevant statutory and non-statutory organisations to further develop its proposals for the Project. It is in the process of discussing and putting in place Planning Performance Agreements (PPAs) with relevant Local Planning Authorities (LPAs).

Table 4: Table of engagement with Statutory Bodies and Local Authorities (not an exhaustive list) on Heathrow Expansion Project

Main Statutory Bodies	Engagement
Active Travel England	Engaging with Heathrow alongside Department for Transport.
National Highways	Monthly steering group meetings and a series of Technical Working Groups are established.
Network Rail	Meetings are established to discuss materials by rail.
Transport for London	Bi-lateral meetings with the Greater London Authority with HAL Town Planning team, attendance at Planning Working Group. Bi-lateral meetings with HAL Surface Access Team. Attendance to Heathrow Area Transport Forum Board and Expansion Group. Established Technical Working Groups.
National Grid Electricity Transmission	First meeting has taken place in early August 2026, with a proposed meeting cadence of monthly meetings.
Southern Electric Power Distribution Plc	To be established.
Cadent Gas Limited	An introduction meeting has taken place, with monthly meetings to be established and set up.
Affinity Water	An introduction meeting has taken place with monthly meetings taking place.
Thames Water	Monthly meetings taking place.
Historic England	Bi-lateral meetings and participation in subject working groups that commenced in the spring 2026.
Natural England	Bi-lateral meetings and participation in subject working groups that commenced in the spring 2026.
The Environment Agency	Bi-lateral meetings and participation in subject working groups that commenced in the spring 2026.
Civil Aviation Authority	Engagement on Heathrow Expansion DCO commenced in April 2026, with

	steering group meetings every two months, a concurrently running strand of engagement series across the specialisms (airspace, ongoing aerodrome certification, airport & aviation security, economic regulation, DCO EIA).
Council of Independent Scrutiny of Heathrow Airport (CISHA)	HAL engage with meetings on a quarterly basis.
Heathrow Area Transport Forum Expansion Group	A monthly meeting with Transport for London, Network Rail, National Highways, Local Authorities and Department for Transport.
Local Planning Authorities	Engagement
Buckinghamshire County Council	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
London Borough of Hillingdon	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
West London Alliance	Attend Planning Working Group hosted by HAL.
London Borough of Ealing	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
London Borough of Hounslow	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Spelthorne Borough Council	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Royal Borough of Windsor and Maidenhead	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Slough Borough Council	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Three Rivers District Council	Bi-lateral meetings with HAL Town Planning Team have yet to commence. Attend Planning Working Group hosted by HAL.
Surrey County Council	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
London Borough of Richmond upon Thames	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.

London Borough of Wandsworth	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Hertfordshire County Council	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Greater London Authority	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Elmbridge Borough Council	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Heathrow Strategic Planning Group (HSPG)	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Runnymede Borough Council	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Subject Working Groups	Engagement
A series of environmental Subject Working Groups with Local Planning Authorities and environmental stakeholders.	Monthly meeting cadence hosted by HAL.

Table 5: LPAs HAL is seeking to enter into a PPA with

LPAs	PPA	Anticipated timeframe by which PPA agreed
Buckinghamshire County Council	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
London Borough of Hillingdon	Discussions are underway to agree to a PPA at pre-application stage.	September 2026 (agreed and signed)
London Borough of Ealing	Discussions are underway to agree to a PPA at pre-application stage	Autumn 2026
London Borough of Hounslow	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
Spelthorne Borough Council	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
Runnymede Borough Council	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
Elmbridge Borough Council	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
Royal Borough of Windsor and Maidenhead	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026

Slough Borough Council	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
Three Rivers District Council	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
Surrey County Council	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
London Borough of Richmond upon Thames	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
London Borough of Wandsworth	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
Hertfordshire County Council	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
Heathrow Strategic Planning Group	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026
Greater London Authority	Discussions are underway to agree a pre-application payment mechanism.	Autumn 2026
Transport for London	Discussions are underway to agree to a PPA at pre-application stage.	Autumn 2026

5 Main Issues for Resolution

- 5.1 Table 5 below provides the Applicant's current view regarding the potential main issues for resolution during the pre-application period and the activities that will be undertaken to address these.

Table 6 Applicant's view of main issues for resolution

Issue	Response
Assumptions and forecasts	The Applicant is currently reviewing and validating its proposals for the Project, this supported the proposals submitted to Government on 31 July 2025. <i>This work includes confirming scheme assumptions and forecasts that underpin the Project.</i>
Design development and option selection	The Applicant will undertake a review of the Project's design to ensure the proposals take account of changes in circumstances since the programme was paused, as well as feedback from consultation and engagement with stakeholders. This includes the masterplan design but also other elements of the scheme including, for example, the mitigation package, jobs and skills requirements, and the proposals for the community fund.
Scheme impact and mitigation	The Applicant's preliminary view is that some minor aspects of the Project and scope of supporting information will need to be refreshed and refined to take into account changes in circumstances since the pause in 2020. Some aspects have changed since the project pause and methodologies are being newly developed. The Applicant will be seeking to ensure an agreed methodology and baseline is in place with stakeholders before impact and appropriate mitigation can be agreed (e.g. ultra fine particles). An Addendum Scoping Opinion was received on 10 October 2025 and together with the 29 June 2018 EIA scoping opinion for the Project which was adopted by PINS on behalf of the Secretary of State on 29 June 2018 this sets out the scope of the EIA to accompany the DCO. The Applicant will undertake a refreshed assessment on surface access proposals, including exploring coach, bus, rail connectivity and active travel infrastructure. The Applicant will assess the surface access strategy with regard to the transport mode share targets and staff car trips set out in the current Airport National Policy Statement (ANPS), acknowledging a review of the ANPS is underway, the draft Heathrow Expansion National Policy Statement (HENPS) published for consultation on 18 June 2026.
Land and property acquisition	The Applicant will review any changes to the baseline position and re-engage with landowners and occupiers.
Construction impacts	The Applicant will review and validate the proposed construction approach, taking into account any changes in circumstances and delivery requirements for the Project.
Publication of amended ANPS	The Applicant is mindful of the draft Heathrow Expansion National Policy Statement (HENPS) being consulted upon this summer (2026) alongside preparation of a consultation on the project. The

during the course of pre-application stage	Applicant will be mindful when preparing consultation materials for the autumn of 2026 and the development of the programme, to allow provision to amend the scheme as necessary in light of the amended ANPS.
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6 Main Risks to the Pre-Application Stage

- 6.1 The Applicant operates a process to identify and monitor risks to the programme in line with best practice for major infrastructure projects. The Applicant recognises the risks associated with updating the Project proposals, which have been developed over a long period, including a period of hiatus.
- 6.2 The Applicant has identified the need to update the Project assumptions to reflect any legislative, policy or other baseline changes. In particular, the Applicant recognises the changes as a result of the Planning and Infrastructure Act 2025 and as a result of the review of the ANPS. The Applicant will respond to any implications for the project resulting from changes in legislation and/or policy as they arise.
- 6.3 The Applicant recognises that risks will be identified as the Project progresses through the pre-application stage and are outlined in Table 7 below. This includes the risk of changes to the programme and submission that could arise as a result of matters identified during the pre-application stage.
- 6.4 The Applicant will continue to track any risks to the achievement of the pre-application stage and manage them by keeping the programme under review.

Table 7 Applicant's view of main risks at pre-application stage

	Risk Area	Description of Risk	RAG	Potential Implication and proposed mitigation/ resolution
1	Stakeholder resourcing	Technical stakeholders and Local Authority resourcing for a project of this scale could jeopardize engagement, review and comment of material.		The Applicant will seek to agree Planning Performance Agreements (PPAs) with Local Authorities and the equivalent with technical stakeholders to enable effective resourcing at pre-application stage. Implication could be disagreement on costings, which is currently being worked through.
2	Mismatch with proposed amendments to the Airports National Policy Statement (ANPS)	The Government's proposed amendments to the ANPS, the draft Heathrow Expansion National Policy Statement (HENPS) consulted on in Q3, 2026, shortly before DCO consultation in Q4, 2026, contain new or changed policies with which the scheme is not compliant.		In light of the publication of the draft Heathrow Expansion National Policy Statement (HENPS) the applicant is preparing the consultation documentation using a consistent narrative. This includes but is not exhaustive; the documentation recognises the proposed amendments have been consulted on but are yet designated policy, states that the ANPS remains the current starting point for consideration of Heathrow expansion, explains that Heathrow has reviewed the proposed amendments and is considering their implications, commits to further engagement and review as required once the HENPS is published which is proposed late 2026.
3	Draft Heathrow Expansion National Policy Statement (HENPS) – Surface Access	The draft HENPS for Consultation (June 2026) set out revised approach to setting Colleague targets against which Surface Access evidence will be measured. There is a risk these change post-consultation, as part of the HENPS that will be designated in late 2026.		The targets/approaches in the draft HENPS (June 2026) will form the basis of modelling that will underpin the transport evidence base for the application for development consent. If these change post consultation, toward the end of 2026, there is a risk that modelling and assessment work would need to be re-done, as would approaches set out in the Transport Assessment and Environmental Statement. The Heathrow Surface Access team will also have expended significant engagement with stakeholders in the period to the end of the year, and would need to revisit this, risking creating uncertainty amongst stakeholders. To mitigate against this risk, the modelling will consider sensitivity tests under different assumptions as well as an approach to Uncertainty assessment, reflecting best practice and guidance where it is applicable. The uncertainty assessment will provide

				ranges of plausible futures that will help to demonstrate performance under different plausible futures, with ranges providing insight as to how the assessment may change with differing levels of modal share.
4	Draft Heathrow Expansion National Policy Statement (HENPS) – Surface Access	The draft HENPS for Consultation (June 2026) set out revised Passenger targets, which – unlike the ANPS – states it “ <i>considers that enhanced rail connectivity is necessary for supporting expansion at Heathrow</i> ”, whilst the vision document for Surface Access published alongside notes this is required for growth beyond 113mppa. The draft HENPS notes this does not need to necessarily form part of the expansion DCO, but that a plan must be “credible”. It is not clear what extent “credible” means, as the HENPS does not elaborate further.		Heathrow will need to develop an approach to identify what rail scheme(s) may help meet the ‘vision’ for Surface Access, and will need to do so from varying levels of engagement with stakeholders. CAA’s consultation on Surface Access regulation is also outstanding, and it is not clear what this will say may be permissible for Heathrow to consider. As no specific scheme is called out, different stakeholders will no doubt have different considerations of what the most important new rail considerations should be, and this may lead to some stakeholder groups disagreeing with others. This will be mitigated through commencing work on the development of a credible plan, and also through collaborative working with our stakeholder group to develop a strategic vision for rail, that sets out an approach that is clear and considers appropriate phasing. Our Airport Transport Forum is convening a rail working group to align stakeholders.
5	Draft Heathrow Expansion National Policy Statement (HENPS) – Surface Access	The draft HENPS for Consultation (June 2026) states that the CAA departing passenger survey data must be used as the basis for measuring performance against mode share targets. This survey appears to under report public transport mode share compared to Heathrow’s own Profiler survey, and gateline data for the Elizabeth Line.		If there is systematic under-reporting of mode shares in the CAA Departing Passenger survey, this will make it more difficult to present the achievement of mode shares, particularly given the binary nature of meeting/not meeting set out in the draft HENPS. Heathrow will liaise with the CAA and DfT to understand the reasons for the apparent underperformance, and suggest the use of alternative data sources to set out a plausible range of mode shares.
6	Airspace Change Process	Delays or uncertainty in the flightpath design work needed to support the Environmental Statement.		There is a risk the flightpath design work needed to support the Environmental Statement will not be ready or stable in time. If this happens, the environmental assessments (such as noise, air quality and carbon) may have to be based on outdated or uncertain information, which could delay consultation or DCO submission and result in inconsistencies in information if different information enters the public domain at the same time. Proposed mitigation includes maintaining regular technical engagement with UKADS, the CAA and stakeholders with regular programme reviews to monitor progress, dependencies and emerging changes. Undertake assessment based on the best available airspace information and agreed assessment assumptions.

				Proposed resolution is to use the latest airspace information and agreed assessment assumptions, including design envelopes where necessary, to support a robust Environmental Statement.
	7	Late stakeholder feedback	Feedback on the scheme could be submitted late, outside the consultation period and in close proximity to scheme chill for the preparation of DCO documentation.	The implications could be design re-work and programme delay, increased risk of challenge or objection, misalignment of assumptions and baseline date, potential for additional consultation or re-consultation. The Applicant will endeavour to mitigate the risks via topic-specific forums to encourage issues to be raised early, maintain a live issues tracker. Ensuring consistent communications and responsive targeted engagement on high-risk topics.