

Pre-Application Programme Document V3
Expansion of Heathrow Airport (Third Runway)
March 2026

CONTENTS

- 1 Introduction _____ 3
- 2 Project Description _____ 6
- 3 Pre-Application Timetable _____ 9
- 4 Stakeholder Engagement and Consultation _____ 15
- 5 Main Issues for Resolution _____ 20
- 6 Main Risks to the Pre-Application Stage _____ 22

1 Introduction

- 1.1 This updated Pre-Application Programme Document (v3) 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 October 2025.
- 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 Support for the principle of the Project is 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 annum². 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.
- 1.5 On 22 October 2025, the Secretary of State for Transport launched a review of the ANPS and indicated that “if amendments are needed to the ANPS as a result of the review, we expect to consult on an amended policy statement by next summer”³.
- 1.6 A revised National Networks NPS (NNNPS), the relevant national policy statement for highways infrastructure, was published on 24 May 2024⁴. The NNNPS is relevant to some highway components of the Project.

¹ PINS NSIP project page

² ANPS paragraphs 1.15 and 4.3

³ Realising the benefits of expansion at Heathrow Airport

⁴ NNNPS

- 1.7 The Government has recently confirmed its support for the expansion of Heathrow airport. In January 2025, the Chancellor of the Exchequer announced 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."*⁵

- 1.8 In response to a letter from the Secretary of State for Transport dated 30 June 2025, which invited proposals for a third runway to be brought forward by 'this summer'⁶, the Applicant submitted its proposals for Expanding Heathrow on 31 July 2025 ("the Proposals Submission")⁷. As the letter from the Secretary of State explains, that invitation for proposals does not form part of the development consent order (DCO) process, which is underpinned by the PA 2008 referred to above. The letter indicated that "applications for planning consent (are expected to) come forward in time to enable decisions to be made this Parliament".
- 1.9 On the 22nd October 2025, the Secretary of State (SoS) for Transport confirmed launch of a review of the Airports National Policy Statement⁸. This statement went on further to say "we are committed to making a decision on a third runway at Heathrow within this Parliament, and we are clear in our ambition to see flights taking off on a new runway in 2035". It was confirmed in October, that consultation on an amended policy statement will take place by next summer (2026) and subsequently be published by the end of 2026.
- 1.10 On the 25th November, a Statement of Approach was issued by ministers and officials dealing with the review of the Airports National Policy Statement⁹. This policy paper confirmed the following "the Secretary of State for Transport has decided that the scheme promoted by Heathrow Airport Limited will be taken forward to inform the ongoing ANPS review".

The Pre-Application Programme Document

- 1.11 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 moving to the enhanced pre-application service on 1 October 2025.
- 1.12 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

⁵ Chancellor's Announcement of support for Heathrow Expansion

⁶ Letter to potential promoters of Heathrow expansion

⁷ HAL Our Proposal for Expanding Heathrow

⁸ Heathrow: National Airports Review

⁹ Statement of approach by ministers and officials dealing with the review of the ANPS

local authorities, to understand the relevant timescales and ensure their contribution is programmed into the pre-application stage at the most effective point.

- 1.13 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'¹⁰, as well as relevant advice issued by PINS in the 'Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus'¹¹, as amended on 22 October 2025.
- 1.14 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.
- 1.15 In particular, the Applicant had been monitoring the progress of the Planning and Infrastructure Bill ("PIB") through Parliament that took place last year (2025)¹². The Planning and Infrastructure Act ("PIA") received Royal Assent on 18 December 2025. The PIA includes a number of changes that are significant for the Project. As an example, the Act removes the requirements for statutory pre-application consultation and the government is proposing to replace those requirements with guidance on non-statutory pre-application consultation and engagement. It will be necessary to take the changes brought about by the PIA and related guidance into account, in formulating the approach to further consultation and engagement on the project.
- 1.16 However, many of its provisions have not yet been brought into force but are expected to be in stages during 2026. This Pre-Application Programme Document will be updated accordingly throughout the year to reflect this.
- 1.17 This Pre-Application Programme Document is published on the Applicant's project website.

¹⁰ Guidance on the pre-application stage for NSIPs

¹¹ Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK

¹² MHCLG Consultation on streamlining infrastructure planning

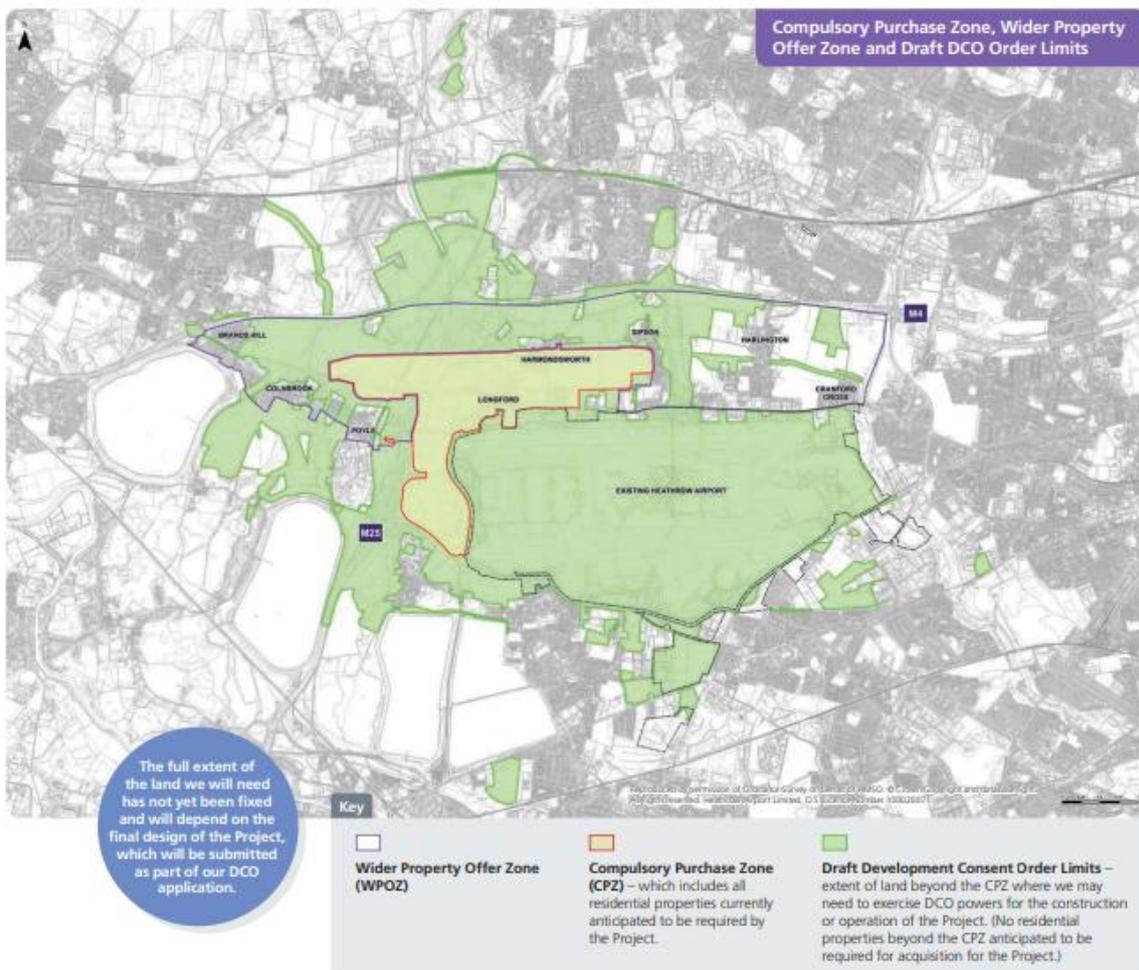
2 Project Description

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 DCO 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 document¹³, which shows the draft DCO order limits (as well as the compulsory purchase zone and wider property offer zone) as understood at that time.

Figure 1: Draft DCO Order Limits (June 2019)



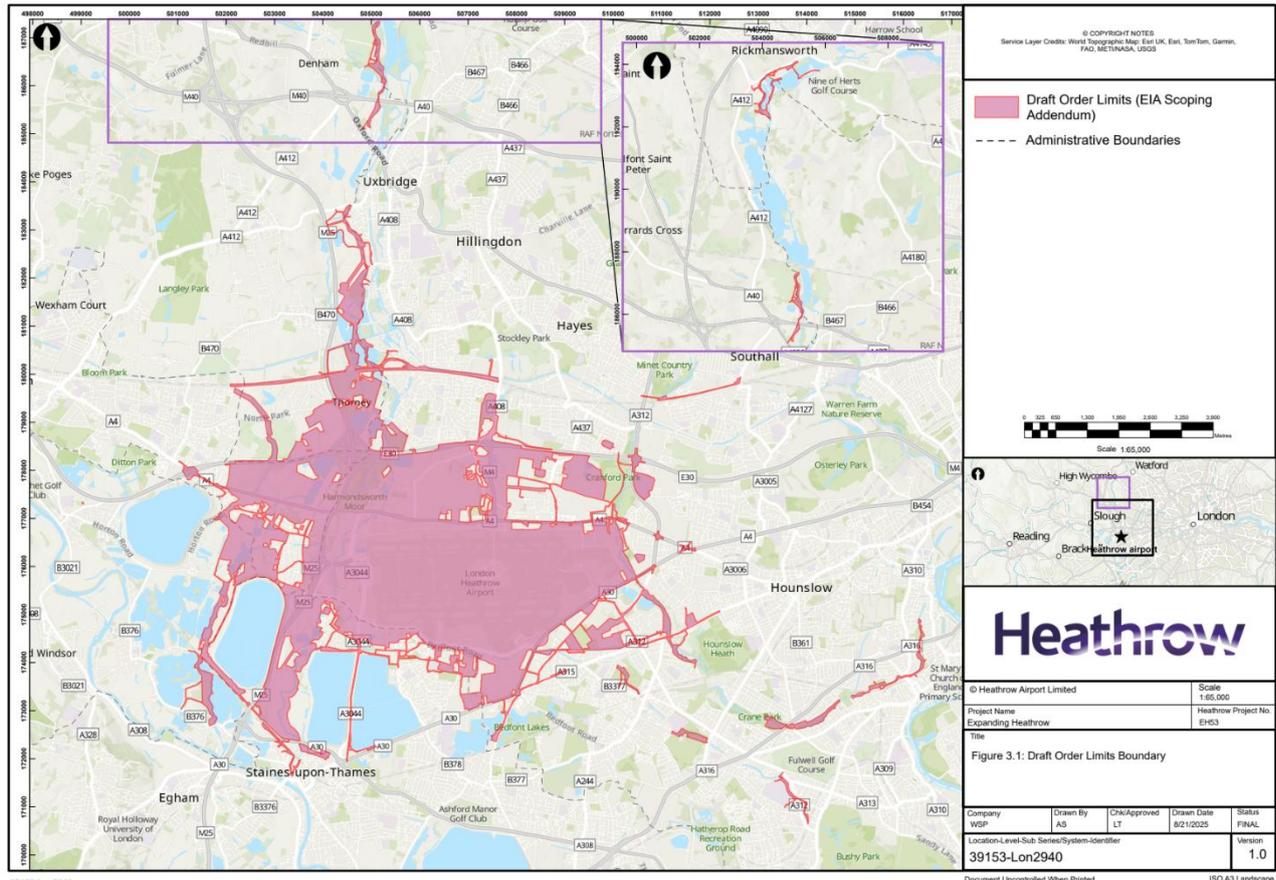
2.3 An updated version of the Project draft DCO Order Limits was submitted to PINS on 1 September 2025 as part of the Applicant’s EIA Scoping Report Addendum (“the EIA Scoping

¹³ Heathrow Airport Expansion Consultation Document June 2019

Report 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’)¹⁴. 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**

¹⁴ 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 is unlikely to 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 the 15th January 2026 Heathrow Airport Limited issued a press release¹⁵ 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 Autumn 2026 to ensure that the DCO application to be submitted is informed and shaped by up-to-date data and feedback.
- 3.6 As alluded 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**)¹⁶ and the Scoping Opinion (adopted by the Secretary of State on 29 June 2018) (**the 2018 Scoping Opinion**)¹⁷. 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 are anticipated to take 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 the 18 December 2025, by secondary legislation and guidance. There was confirmation in October 2025 of an ANPS review, with a revised ANPS to be consulted upon by the summer of this year (2026) and an amended ANPS published by the end of 2026. During the autumn of 2025, the Civil Aviation Authority conducted a consultation on the airspace change process. The

¹⁵ Heathrow press release

¹⁶ EIA Scoping Report Volume 1 Main Report (May 2018)

¹⁷ The Planning Inspectorate Scoping Opinion (June 2018)

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
Project consultation	September – October 2026
Further PINS meetings to be determined	October 2026 onwards
PINS Draft DCO Application Documents Review	End 2026 / early 2027
Adequacy of Consultation Milestone	September 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), Design and approach to terminal design.	June 2026
Implementation of Planning and Infrastructure Act with developing scheme including PEI. Implications on Project, if any, of draft ANPS policy changes (assumes a draft amended ANPS is issued for consultation in June) & Introduction to emissions issues (UFP), Design Approach to Surface Access Components.	July 2026
Run through of full consultation material (assumes consultation to take place in the autumn), Design Approach to Blue & Green Infrastructure.	September 2026
Design Approach to associated development (airport related development, heritage assets and re-located community facilities)	September 2026
Earthworks, Materials Management and Approach to Permitting, Approach to construction layout and logistics.	October 2026

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 can be presented at the April meeting	Undergoing Governance	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 can be presented at the April meeting.	Slides in development	PEI Chill and Evaluation
DESIGN	Flexibility Approach and Design Delivery	To set out approach to flexibility and continuance through to delivery	Flexibility approach can be presented in May	Policy and approach in development	Governance and delivery strategy
DESIGN	Scheme Development Report write up	To set out approach to scheme development report	Presentation can be presented in May	In development through review of old material	Governance
DESIGN	Airfield Layout and Terminals – Design	To set out airfield design and	Design and approach to delivery for	Final review of components	None

	and Associated Codes	approach to terminal design	these components can be presented in June	prior to PEI Chill	
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 July.	Final review of components prior to PEI Chill	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 August.	Final review of components prior to PEI Chill	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 September.	Final review of components prior to PEI Chill	Option Selection for Flooding, FF and other aspects
DESIGN	Design presentation summary for Consultation	Set out design for stat con	September	In development	Stat con deliverables
DESIGN & DELIVERY	Earthworks, Materials Management and Approach to Environmental Permitting, Licences and Consents	Set out approach	October	In development	CSS Evaluation (as could determine logistic changes etc)
DELIVERY	Construction Support Sites and Overall Logistics Approach	Set out layout of construction and activities associated with this	Presentation in October once evaluation complete. 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,	Presentation in Sept/Oct during examination Strategy document and attached excel document	In development	PLC Strategy

		licences and consents			
OPERATIONS	Proposed Operational approach.	To explain how operational matters would be secured in the DCO	Mid 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 in Q1 2026.

4.4 The Applicant intends to undertake a further round of consultation between September and October 2026, prior to submitting its DCO application. The Applicant recognises that the new consultation arrangements following Royal Assent of the Planning and Infrastructure Act in December 2025 are imminent. Whilst a consultation will take place, regard will be given to both the Planning and Infrastructure Act and resulting guidance which is expected in Summer of 2026.

4.5 For the purposes of consultation with local communities, the Applicant prepared and published a SoCC earlier in the process in accordance with section 47 of the PA 2008. The Applicant intends to engage with local authorities and other stakeholders on its proposed approach to further community consultation, including in light of changes that are to be introduced under the Planning and Infrastructure Act when secondary legislation is made.

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	Intention for Transport for London to advise on behalf of Active Travel England.
National Highways	Monthly steering group meetings and a series of Technical Working Groups to be established.
Network Rail	Meetings are established to discuss materials by rail.
Transport for London	Bi-lateral meetings with the Greater London Assembly with HAL Town Planning team, attendance at Planning Working Group. Bi-lateral meetings with HAL Surface Access Team.
National Grid Electricity Transmission	To be established.
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	An introduction meeting has taken place.
Historic England	Bi-lateral meetings and participation in subject working groups to be set up and commence from the spring 2026.
Natural England	Bi-lateral meetings and participation in subject working groups to be set up and commence from the spring 2026.
The Environment Agency	Bi-lateral meetings and participation in subject working groups to be set up and commence from the spring 2026.
Civil Aviation Authority	Engagement on Heathrow Expansion DCO to commence from April 2026.
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, 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.
Hertfordshire County Council	Bi-lateral meetings with HAL Town Planning Team and attend Planning Working Group hosted by HAL.
Greater London Assembly	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 to commence spring 2026.

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.	April 2026
London Borough of Hillingdon	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
London Borough of Ealing	Discussions are underway to agree to a PPA at pre-application stage	April 2026
London Borough of Hounslow	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Spelthorne Borough Council	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Runnymede Borough Council	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Elmbridge Borough Council	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Royal Borough of Windsor and Maidenhead	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Slough Borough Council	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Three Rivers District Council	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Surrey County Council	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
London Borough of Richmond upon Thames	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Hertfordshire County Council	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Heathrow Strategic Planning Group	Discussions are underway to agree to a PPA at pre-application stage.	April 2026

Greater London Assembly	Discussions are underway to agree to a PPA at pre-application stage.	April 2026
Transport for London	Discussions are underway to agree to a PPA at pre-application stage.	April 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 the 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 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	<p>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).</p> <p>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.</p> <p>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 announced in October 2025 is underway.</p>
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 during the course of pre-application stage	The Applicant is mindful of a draft amended Airport National Policy Statement (ANPS) to be consulted upon this summer (2026) alongside preparation getting underway from the spring (2026) up until the summer of a consultation on the project. The 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 potential change 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.	Yellow	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, intended to be consulted on in Q3, 2026, shortly before DCO consultation in Q4, 2026, contain new or changed policies with which the scheme is not compliant.	Red	This could delay the DCO consultation to later on in the year or to the following year or mean another DCO consultation is required should ANPS policy drastically change such that the scheme is no longer compliant with it. The resolution would be changes being made to the scheme and potentially to consultation materials.
3	Draft Airport National Policy Statement (ANPS) – Surface Access	Expectation of policy change to the proposed public transport mode share for passengers and colleagues. Current modelling is using existing policy to seek compliance with.	Red	Concern as to more stringent ANPS requirements which could start the delay of consultation and require redesign, new modelling and redevelopment of key scheme information. The resolution would be to re-run surface access models, revise the transport assessment and Environmental Statement chapters, potentially changing the surface access strategy. This would create greater stakeholder scrutiny.
4	Airspace Change Process	Delays or uncertainty in the flightpath design work needed to support the Environmental Statement.	Yellow	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.
5	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.	Yellow	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

				<p>consistent communications and responsive targeted engagement on high-risk topics.</p>
6	<p>Late commencement of reforms in the Planning and Infrastructure Act 2025 to bring in non-statutory consultation.</p>	<p>The approach to consultation is built around the anticipated commencement of relevant reforms in the Planning and Infrastructure Act 2025 this summer, but should this be delayed it could have repercussions on the approach to our proposed consultation.</p>		<p>The repercussions include the detail with reference to which consultation material is prepared - if the consultation is non-statutory the amount of detail is more discretionary and the applicant has greater choice to determine the level of detail. Should commencement of the reforms be delayed, consultation would have to be statutory and the approach is likely to be far more complex and detailed. To mitigate the Applicant will adopt a flexible approach to consultation and engagement. This means front loading technical engagement with stakeholders.</p>