

Expansion of Heathrow Airport (Third Runway)

Section 51 Advice Log Version: 02 September 2026

This document comprises a record of the s51 advice that has been given by the Planning Inspectorate to the applicant (Heathrow Airport Limited) during the pre-application stage. It will be updated by the Planning Inspectorate after every interaction with the applicant within which s51 advice has been given.

The applicant will always be given the opportunity to comment on the Planning Inspectorate's draft record of the s51 advice given before it is published on the relevant project page on the [Find a National Infrastructure Project website](#).

The role of the advice log at the acceptance stage

Section 55(4) of the PA2008 requires the Planning Inspectorate to consider, amongst other things, the extent to which the applicant has had regard to the s51 advice given by the Planning Inspectorate in connection with the application when deciding if the application can be accepted for examination. Section 51 advice includes:

- advice given about applying for an order granting development consent
- advice given about making representations about an application for an order granting development consent

The applicant will use this advice log as the tool for demonstrating:

- regard to the s51 advice given to the applicant by the Planning Inspectorate
- regard to any s51 advice given to others by the Planning Inspectorate

The applicant will submit a final version of this advice log which demonstrates regard to all s51 given by the Planning Inspectorate at the pre-application stage as part of the application.

Expansion of Heathrow Airport (Third Runway) – Applicant meeting index

Date of meeting	
28 April 2025	<u>Inception Meeting:</u> • Consenting programme and introduction to the pre-application programme document • EIA scoping • Consultation (statutory and non-statutory) • The pre-application service offer
4 June 2025	Project Update Meeting: • Scoping
27 October 2025	Email Advice - Update to Pre-application Prospectus
8 December 2025	Project Update Meeting: • Environmental Impact Assessment • Scoping Opinion • Assessment methodologies • Baseline data • Primary Service Issues Tracker template • Programme Document (post-meeting note)
14 January 2026	Project Update Meeting: • Consultation • Environmental Impact Assessment Regulations • Joint Evidence Base and Infrastructure Study (JEBIS) • Local communities • Airspace change process
17 February 2026	Email Advice
5 March 2026	Project Update Meeting: • Application document structure, including register of environmental actions and commitments and plans • Update on environmental assessment methodologies • Project update meetings
21 April 2026	Project Update Meeting: • Consultation

	• Design principles and documents • Green belt use • Programme document
<u>18 May 2026</u>	Project Update Meeting: • Stakeholder Engagement Update • Design Flexibility • Scheme Development Report and Design Approach Document
<u>15 June 2026</u>	Multi-Party Meeting: • Airports National Policy Statement (ANPS) • Engagement
<u>25 June 2026</u>	Project Update Meeting: • Environmental Statement • Introduction on approach to Environmentally Managed Growth (EMG) • Consultation Scope and Materials • Pre-application Prospectus primary components
<u>16 July 2026</u>	Project Update Meeting: • Ecological Survey Work • Design and approach to terminal design
<u>17 July 2026</u>	Email Advice
<u>28 August 2026</u>	Email Advice

Expansion of Heathrow Airport (Third Runway) – Log of s51 Advice given to the applicant

Meeting date: 28 April 2025

Topic	s51 advice given	Applicant regard to s51 advice given
Consenting programme and introduction to the pre-application programme document	The Inspectorate noted that the applicant's programme document provided a high level of detail of both past events and future anticipated events. The Inspectorate advised that any updated programme document should include any Project Update Meetings, so these can be resourced effectively. Presently the Applicant has proposed to remain within the 'Basic Tier' service which affords a total of 3 meetings per year.	
EIA scoping	The inspectorate asked if there had been changes likely to affect EIA scoping? The applicant explained that as the design evolves, there had been changes to the order limits to facilitate off-site mitigation and define property boundaries. These are not considered to	

	be major changes but that, whilst the proposals are broadly the same, it would be seeking a further scoping opinion, and it is currently in the process of producing the scoping report and request and confirmed it is in dialogue with statutory consultees to this end. The applicant is eager to engage with the inspectorate early and would seek a meeting to this effect. The inspectorate advised that any meeting would depend on the service tier in effect at the time and that it would be beneficial for the applicant to provide an agenda and information for discussion in advance of any such meeting, to enable the inspectorate to provide meaningful advice.	
Consultation (statutory and non-statutory)	The applicant is aware of the forthcoming amendments to the Planning and Infrastructure Bill, which seeks to remove the requirement to undertake statutory consultation at the pre-application stage. The inspectorate is currently uncertain of how the changes to consultation may impact the process and advises to keep this matter open for discussion as information becomes available.	

The pre-application service offer	The inspectorate enquired if the applicant had considered which pre-application service tier would be most suitable. It advised that the basic tier would only provide for three project update meetings per year and there would be no provision of an evidence plan meeting. With this in mind, the inspectorate recommends the standard tier and advised the applicant to consider the enhanced tier, based upon its involvement with the project during the pre-application stage prior to 2020. The applicant wishes to continue with the basic tier at this time and is considering which tier would be most appropriate. It intends to confirm this decision within the next few months, following making the proposal known to government in summer 2025. The inspectorate advised that full information on the three service tiers was available in the pre-application prospectus	
Meeting date: 04 June 2025		
Topic	s51 advice given	Applicant regard to s51 advice given

Use of scoping addendum to supplement the scoping report of 2018	The applicant received a scoping opinion for the proposed development in 2018. Further design changes were made prior to a pause in project design in 2020. The applicant confirmed that it now intends to proceed with the application. It explained that the proposal has not changed significantly since the 2018 Scoping Report, although noted that the proposed draft Order Limits have been amended. The applicant confirmed that it intends to submit an addendum to the 2018 scoping report in July 2025 to reflect the revised proposals, current legislation, policy, guidance and assessment methodologies. The addendum would also be informed by engagement undertaken since the 2018 Scoping Report.	
Consultee List for Scoping	The Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017 require the SoS to consult with bodies prescribed in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) (APFP) Regulations. The APFP Regulations were amended in April	

	2024 by the Miscellaneous Provisions (MP) Regulations 2024. The transitional provisions state that the revised APFP Regulations do not apply to any proposed application for an order granting development consent where the applicant has started to consult under section 42 (s42) of the Planning Act 2008 before 30 April 2024.	
Meeting date: 27 October 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Email Advice - Update to Pre-application Prospectus	IMPORTANT INFORMATION ABOUT UPDATES TO OUR PRE-APPLICATION SERVICES Following a 6-month review of our services, our Pre-application Prospectus has been updated: 2024 Pre-application Prospectus. The update log at the bottom of the page summarises the changes and clarifications that have been applied. As an applicant with a live project at the pre application stage of the process, please familiarise yourself with the update and consider how it might affect your pre application	

	programme and interaction with our services. Please note in particular: • the establishment of land and rights negotiations tracking as a primary service feature – this means it is now expected for all applicants to develop and share a land and right negotiations tracker in 1 of 2 available templates, irrespective of the service tier they have subscribed to • clarified expectations of applicants when preparing to interact with the Inspectorate at meetings – including clarified rights for the Inspectorate to delay or refuse service where pre meeting expectations are not upheld e.g. an updated programme document or issues tracker is not provided, on time, to inform a meeting agenda	
Meeting date: 08 December 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Environmental Impact Assessment (EIA)	The Inspectorate informed the applicant that, on past applications, being clear on where enabling or associated works permitted outside of the DCO application affect the capacity of the	

	airport, and how this in turn impacts the baseline, should be identified in the EIA.	
Scoping opinion	The Inspectorate highlighted that health stood out in the scoping consultation responses as a key matter, particularly for local authorities. It noted that health is a complex matter for assessment and that, as set out in the scoping opinion, this matter should be discussed further with consultation bodies.	
Assessment methodologies	The Inspectorate recommended that where agreement is not reached on assessment methodologies, this should be clearly set out in application documents. Understanding both sides of the argument is useful for the Inspectorate. The Inspectorate also highlighted that disagreements on methodologies can have a significant impact on the examination and therefore urged the applicant to seek agreements with relevant parties to support as smooth an examination as possible.	
Baseline Data	The applicant asked the Inspectorate if it had any comments on it updating their baseline biodiversity data and whether reflecting this within an issues tracker is	

	advised. The Inspectorate confirmed that tracking such issues is useful for understanding potential examination matters. It advised that it is important that the applicant demonstrates how it has had regard to interest groups requests for additional survey work. The Inspectorate emphasised that securing agreements with the statutory advisors is critical, as unresolved issues would need to be considered during the examination.	
Primary Service: Issue Tracker Template	The applicant asked the Inspectorate if the purpose of the “Issue Tracker” was only to reflect environmental issues or whether it should also reflect non-environmental issues.	
Programme Document Post-meeting note	The Adequacy of Consultation Milestone will need to be programmed into the timetable for submission. It is helpful if this is provided to the Planning Inspectorate at least three months prior to submission.	
Meeting date: 14 January 2026		
Topic	s51 advice given	Applicant regard to s51 advice given

Consultation	The Inspectorate encouraged the applicant to apply the principles of “statutory consultation” outlined within the Planning Act 2008, prior to recent amendments to any future consultations it intends to carry out, noting that these principles would serve as a good baseline.	
Environmental Impact Assessment (EIA) Regulations	The Inspectorate reminded the applicant that any future changes to the Planning Act or associated infrastructure legislation must continue to align with the requirements of the EIA Regulations, as those regulations set the framework that must be met	
Joint Evidence Base and Infrastructure Study (JEBIS)	The Inspectorate advised that the level of interaction between the Environmental Statement and JEBIS should be the deciding factor when considering whether the applicant should include the study within the Development Consent Order (DCO) application. The Inspectorate also noted that if the JEBIS is not included in the DCO application, interested parties will be unable to comment on it in their relevant representations.	

Local Communities	The Inspectorate encouraged the applicant to actively manage relationships with local communities to minimise the risk of social issues arising and emphasised the importance of maintaining clear and consistent communication.	
Air Change Process	The Inspectorate acknowledged that there is likely to be some uncertainty about flight paths/ envelopes during the examination of the application. However, the Inspectorate advised that the applicant, in consultation with all relevant consultees, should do all it can to ensure that the envelopes are as small as practicable. This would allow as much certainty as possible to local communities and help all parties to understand the likely significant effects of the project. The Inspectorate also advised that it is very likely that the examining authority would base its conclusions on the worst-case scenario.	
Meeting date: 17 February 2026		
Topic	s51 advice given	Applicant regard to s51 advice given

Programme document (intended design approach)	It would be useful for the table to include airfield layout, terminals, car parks, associated development (offices/ hotels etc), M25 improvements and landscaping across the application site. The table should also be produced having regard to the 'Criteria for 'good design' for airports infrastructure' section of the current ANPS.	
Meeting date: 05 March 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Register of environmental actions and commitments	The Inspectorate advised that it would be appropriate for the applicant to keep the register of environmental actions and commitments documents together in one volume of application documents.	

Plans/ drawings	The Inspectorate appreciated the need for the applicant to show layers/ components of the proposed development on a number of plans and other drawings for the detail of a specific component to be understood. It did however advise that this should be considered alongside a reader being able to understand the proposed development and the relationship/ interactions between components.	
Plans/ drawings Post-meeting advice	The applicant advised that it may provide some indicative plans to show how some aspects of the proposed development could be delivered. Where such plans are showing proposed mitigation, for example such as highway improvements, the Inspectorate considers that such plans may be better placed in draft outline or full management plans, or as figures supporting the Environmental Statement, rather than being published alongside the works plans. This would reduce any potential confusion about the role of the indicative plans.	
Project update meetings (PUMs)	The Inspectorate requested that in future, any slides or agendas for	

	pre-application meetings should be provided at least 10 days in advance, so resourcing and adequate responses can be provided by the Inspectorate at the relevant PUMs.	
Meeting date: 21 April 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Consultation	The Inspectorate advised the applicant to consult on all components of the proposed development. The Inspectorate drew attention to the reference in the applicant's programme document to "statutory consultation", noting that in the meeting the applicant alluded to retaining some components of "statutory consultation", and not going forward with others such as the Statement of Community Consultation (SoCC). The Inspectorate advised the applicant to be mindful of the public-facing element of the programme document referring to "statutory consultation", to avoid confusion.	
Design principles and documents	The Inspectorate encouraged the applicant to share their design principles and related documents with the	

	Inspectorate as soon as possible, as it will be helpful for the Inspectorate to consider them early in the design process.	
Green Belt use	The Inspectorate advised the applicant that the Examining Authority will carefully assess all Green Belt land which forms part of the order limits and the case for very special circumstances to justify its inclusion. The Inspectorate will require the applicant to provide clear justification within their application documentation to demonstrate why the uses proposed in the Green Belt cannot be accommodated within the existing confines of the airport.	
Programme document	The Inspectorate notes that within the 'engagement plan' table in the programme document, the applicant has listed ten, rather than nine, meetings within this period. The applicant was reminded that the nine meetings allowance will refresh from October.	
Meeting date: 18 May 2026		
Topic	s51 advice given	Applicant regard to s51 advice given

Stakeholder Engagement Update	The Inspectorate advised the applicant that having an update at each meeting on a different subject, for example Planning, Environment and Transport, would be helpful for the Inspectorate.	
Design Flexibility	The Inspectorate advised the applicant that, whilst it is appreciated that it may not be possible to provide detailed design information for some components of the proposed development until final design, it should include as much detail and certainty as is reasonably possible for each component in its application documents. This will lead to a smoother examination, as the Examining Authority will look carefully at the level of detail provided for different components, and would likely request further information if it was felt that more detail and certainty could be provided. The Inspectorate welcomed the opportunity to comment further on the level of detail that the applicant plans to provide for each component of the proposed development when this is known.	
Scheme Development Report and Design Approach Document	The Inspectorate noted that, with regards to the scheme development report and design approach document,	

	there could be duplication of information between the documents and with the Environmental Statement. The Inspectorate advised the applicant to reflect on this and to mitigate the risk of inconsistency arising from duplicating information and advised the applicant to ensure documents are proportionate in detail, consistent and accurate. The Inspectorate supported the applicant's proposed visual led approach as part of scheme development reporting, to supplement the text and reduce the overall volume of the document to make it as accessible as possible.	
Meeting date: 15 June 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Airports National Policy Statement (ANPS)	The Inspectorate advised that the Examining Authority will be guided by the Airports National Policy Statement (ANPS) when considering what is required from the Civil Aviation Authority (CAA) during any future examination. Based on the current ANPS, the key expectation is that the CAA would issue a letter of no impediment during the examination to confirm the applicant has engaged with the CAA to the extent that	

	the CAA would expect, alongside assurance that any relevant security matters have been addressed to the CAA's satisfaction and therefore would not need to be a matter examined by the Examining Authority. The Inspectorate explained that it does not see the need for engagement between the Inspectorate and the CAA beyond what is set out in the ANPS. The Inspectorate noted that the Examining Authority will likely focus on whether the applicant has provided sufficient information for the CAA to confirm its position.	
Engagement	The Inspectorate asked whether the CAA had any further thoughts on the level of engagement it may require with Heathrow and UK Airspace Design Service (UKADS).	
Meeting date: 25 June 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Environmental Statement	The applicant noted that the proposed draft revisions to the Airport National Policy Statement (the draft Heathrow Expansion National Policy Statement) had been published and that it changes assessment requirements. It queried	

	whether it should re-scope under the EIA Regulations. The Inspectorate advised that an Environmental Statement (ES) should be based on the most recent scoping opinion. However, a scoping opinion is written at a given point of time based on the information available. The Inspectorate acknowledges that policy may change in the intervening period between a scoping opinion being adopted and an application being made. The scoping opinion contains a statement acknowledging that agreements with consultation bodies can be made after a scoping opinion is adopted. The Inspectorate advised the applicant to seek to agree approaches with relevant consultations bodies and to provide a narrative of changes within the ES.	
Introduction on approach to Environmentally Managed Growth (EMG)	The Inspectorate referred to the London Luton Airport Expansion (Luton) and that the Examining Authority (ExA) and Secretary of State (SoS) considered it necessary to secure some noise related restrictions on the face of the Development Consent Order, in terms of contours, flight numbers, and monitoring. While appreciating the nuances and differing circumstances between Luton and Heathrow, the	

	Inspectorate encourages the applicant to look at the findings of the SoS and ExA carefully and consider whether it undermines the ability to effectively deliver noise restrictions and mitigation via EMG and/ or how the applicant will try to address such issues through an EMG framework. The Inspectorate advised that the EMG overseeing body is independent to encourage good levels of stakeholder trust. It referred to recommendations within the Office of Environmental Protection's review of the environmental assessment practice regarding post-decision monitoring and reporting. The Inspectorate advised the applicant to provide clarity between a 'threshold' and a 'limit' in the applicant's EMG approach, and to provide examples of mitigation that could be applied for exceedances of either level. The Inspectorate advised that an ExA would likely look for assurances that there is feasible mitigation available and that there is confidence in its success.	
Consultation Scope and Materials	The Inspectorate noted that the recently published draft Heathrow Expansion National Policy Statement contains	

	requirements for community involvement and that the applicant should ensure that any forthcoming consultation seeks to meet those requirements.	
Pre-application Prospectus primary components	The Inspectorate requests the applicant provides an up-to-date issues tracker and lands and rights tracker, as they are elements of the pre-application prospectus.	
Meeting date: 16 July 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Ecological Survey Work	The Inspectorate advised the applicant to secure access to as much land as possible and undertake comprehensive ecological survey work to provide clarity at the pre-application stage. The applicant confirmed that their current approach is to obtain land access and progress the necessary surveys.	
Design and approach to terminal design	The Inspectorate advised that if the applicant were to pursue a parameter-based design approach for Phase 1 of the proposed development, the Examining Authority (ExA) would likely challenge why full design details	

	could not be provided at the application stage. The Inspectorate noted that, given a detailed design for Phase 1 would likely be required almost immediately following the grant of a Development Consent Order, the ExA would expect clear justification for not presenting full details upfront.	
Meeting date: 17 July 2026		
Topic	s51 advice given	Applicant regard to s51 advice given

Planning and Infrastructure Act 2025 updates	In light of the amended legal framework which will be introduced from 24 July 2026 by the Planning and Infrastructure Act 2025, the Planning Inspectorate issued written advice to the applicant on 17 July 2026 requesting for: - evidence within the submitted application in relation to duties under s46 and s48 of the PA2008 to be provided as an appendix to any engagement summary document that the applicant may choose to submit or, where the applicant chooses not to submit such a document, as a discrete document titled 'Section 46 and section 48 information' - evidence within the submitted application in relation to new s55(4)(e) of the PA2008 to be provided in a submission version of this expanded advice log template	
Meeting date: 28 August 2026		
Topic	s51 advice given	Applicant regard to s51 advice given

Pre-application Issues Tracker	We have now reviewed the issues tracker. Please see our advice below: • The Inspectorate notes that there are many examples in the issues tracker where outstanding issues or disagreements are already being anticipated at the time of application submission. Given the length of time until this is likely to occur, this is of concern to the Planning Inspectorate, who encourages the applicant to seek to reduce the number of such instances, particularly where they relate to assessment methodologies. • The RAG status should be used consistently throughout the document and should reflect the current position. • The applicant should ensure that the 'Likelihood of resolution...' column is not confused with the 'Next interaction' column and is updated accordingly.	
Expansion of Heathrow Airport (Third Runway) – Log of s51 given to others		

Topic	s51 advice given	Applicant regard to s51 advice given
Name and/or organisation	Summary of s51 advice given and link to advice register	Applicant to complete