



Gatwick Northern Runway DCO Case team  
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Transport for London

9 June 2025

5 Endeavour Square  
London  
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Dear Case Team,

**Application by Gatwick Airport Limited (“the Applicant”) seeking Development Consent for the proposed Gatwick Airport Northern Runway Project (“the DCO”)**  
*Comments on Applicant’s Submission of Additional Information of 24 April 2025*

I am writing on behalf of Transport for London (Interested Party, number 20044672) in response to the Applicant’s submission of additional information on 24 April, with specific regard to surface access.

We welcome the Applicant’s reiteration of the importance of sustainable surface access. At the core of the Mayor’s Transport Strategy is its target for 80 per cent of trips to be made by sustainable modes and every trip generator in and around London – including the Applicant – needs to play its part to help tackle highway congestion, air pollution and carbon emissions.

Our written submission of 11 April 2024 raised concerns that the Applicant’s sustainable mode share targets were insufficiently ambitious and that there was inadequate commitment on the levers to be used to drive that mode shift. We share the concerns of the Secretary of State (SoS) about the achievability of the Applicant’s mode share commitments and we note likewise the Applicant’s own lack of confidence in their achievability.

In its response, the Applicant places a heavy emphasis on rail in securing the mode share targets and cites its lack of control over rail service patterns and ticketing as a reason for the different approach. Notwithstanding the importance of improved rail services, we would question the extent to which significant mode shift at the airport is so reliant on rail. Gatwick Airport is better served by rail than perhaps any other airport in the country, with fast, frequent services on a number of key corridors and the proportion of journeys by rail in those corridors reflects the service offered. Substantial potential for sustainable mode shift is likely to be found in corridors not well served by rail, where measures including support for bus and coach services and increased car parking and forecourt charges could effectively be used by the Applicant.

In Requirement 20, the Examining Authority offers a robust mechanism for ensuring sustainable mode share, and without which the additional runway cannot be brought into use. With regard to the amendments proposed by the Applicant, we are concerned that these seek to water down the mechanism’s purpose of securing a greater proportion of trips by sustainable modes. It is

not clear why the Applicant should seek to be allowed to proceed in any scenario where the mode share commitment has not been achieved. Nor is it clear how its suggestion that completion of its highway improvement works, enabling accommodation of additional car and taxi trips, in any way furthers the environmental objectives of sustainable mode shift at the heart of Requirement 20. The provision of additional highway capacity is likely to increase car/taxi demand and so undermine progress towards sustainable mode share targets.

Thank you for the opportunity to further respond to the issues arising from this DCO.

Kind regards



Christina Calderato

Director of Strategy, Transport for London