

LLA Response

Question	Response
1. About your business and the impact of the 1991 TDRs	
<p>Please provide a description of your organisation and the relevance of the 1991 TDRs to it.</p> <ul style="list-style-type: none"> • We invite your views on the impacts the 1991 TDRs (and its potential revocation, amendment or retention) might have on: <ul style="list-style-type: none"> - your business, customers, partners or members; - air cargo services (belly hold and whole-plane), or general or business aviation in London and/or the UK; - efficient use of scarce airport capacity at London/UK airports; - the reasonable interests of air transport users; and - the sound development of civil aviation across the UK. 	<p>London Luton Airport (LLA) is the UK's fifth-largest airport and the country's leading General Aviation (GA) airport. LLA also acts as an overspill airport for Heathrow's cargo demand, handling several whole-plane cargo ATMs each week, although belly-hold cargo activity at LLA remains minimal.</p> <p>The 1991 TDRs have historically supported LLA's growth, particularly by enabling the airport to develop as a key entry point for business aviation and private jets. Restrictions on cargo operations at Heathrow have also allowed LLA to maintain a modest cargo operation. However, changes in the cargo market since 1991—such as consolidation at other major airports and the shift towards large belly-hold hubs—mean that today LLA's cargo operation is significantly smaller than other London airports. Overall, while the TDRs have been beneficial to LLA, the market context in which they operate has changed considerably.</p>
2. Market conditions and substitutability	

We invite your views on:

- any trends or changes in air cargo, and/or general or business aviation, operations and demand in recent years in London/UK, as well as any information on the outlook for these sectors that you consider relevant to our review;
- the key differences between current market conditions and those when the 1991 TDRs were introduced. How these should be considered in the context of any TDRs that might apply to the London area;
- the key barriers to entry and expansion for air transport operators (including, but not limited to, whole plane cargo and general or business aviation operators) at Heathrow, Gatwick and other London airports;
- the extent to which other airports, both inside and outside the London area, provide suitable alternatives for whole plane cargo services, or general or business aviation wanting to operate at Heathrow, Gatwick and/or other London airports and why; and
- the extent to which belly hold and whole-plane cargo service providers serve different customer needs; and the extent to which they are substitutes and/or complementary to each other.

General / Business Aviation (GA)

GA activity has recovered to pre pandemic levels and continues to grow. The nature of GA at LLA has changed markedly since 1991: previously dominated by flying clubs and privately owned light aircraft, today almost all movements involve business jets. Non-commercial movements have risen from around 20,000 in 1991 (with virtually no business aviation) to 29,000 in 2024, of which 28,000 were business aviation movements.

Cargo

The cargo market has changed significantly since 1991. Increased reliance on belly hold freight at Heathrow has contributed to a 50% reduction in dedicated cargo movements at LLA. Cargo operations have increasingly consolidated at East Midlands and Stansted, supported by the growth of large overnight-delivery hubs and the use of much larger cargo aircraft. The small aircraft “datapost” flights common in 1991 have disappeared with digitalisation.

Local industrial decline has also influenced demand: for example, major manufacturing operations in Luton—including Bedford Trucks, Vauxhall, and their supply chains—closed after 1991, reducing local cargo needs.

Barriers, alternatives and substitutability

Growth in low cost passenger travel has reduced overnight slots for cargo operations, while planning and environmental constraints at all London airports limit night time capacity. As a result, East Midlands has become the primary airport for operators requiring night time access.

The same constraints increasingly limit GA flexibility. In summer, business jets often cannot obtain slots after 23:00 at London airports due to noise

	<p>contour restrictions, prompting a shift towards alternatives such as Farnborough, Biggin Hill, and Oxford. This reduces ease of access to London for high net worth and time sensitive travellers, impacting the UK’s competitiveness.</p> <p>Increasingly stringent environmental restrictions—particularly around noise, QC allocations, and ATM limits—are likely to further deprioritise non passenger aviation in future, given its relatively higher noise footprint and lower passenger yield per ATM.</p>
<p>3. Scope and effects of the 1991 TDRs</p>	
<p>We invite your views on:</p> <ul style="list-style-type: none"> • whether the airports currently named in the 1991 TDRs as serving the same area in the UK (Heathrow, Gatwick and Stansted) are still the most appropriate set of airports; or whether other airports should also be considered as serving that same area for the purposes of the 1991 TDRs and why; • how the 1991 TDRs impact airports and airlines’ capacity management, scheduling and operational flexibility in practice; • the extent to which the 1991 TDRs are a binding constraint (i.e. a limiting factor in practice) to entry and expansion for whole-plane cargo and general or business aviation at Heathrow and Gatwick given: <ul style="list-style-type: none"> - the other barriers (e.g. availability of airport capacity) that currently exist; and - whether general and business aviation and whole-plane 	<p>LLA supports introducing a mechanism allowing airports to apply to the CAA/Secretary of State for inclusion within the TDR framework as required, rather than pre-defining specific airports. This approach would enable targeted inclusion based on justification, following consultation with stakeholders and should not be limited to the London system but extended to any Level 3 coordinated airport affected by non-passenger aviation.</p> <p>Definitions of “peak congestion” should be updated to reflect not only physical runway capacity but also increasingly binding environmental constraints such as noise contours, QC limits, and ATM caps. These constraints apply both during the day and at night and can materially restrict passenger operations.</p> <p>LLA does not support the allocation of flight series to business aviation or ad-hoc cargo operators.</p>

<p>cargo operators would benefit from accessing regular slot series vs ad-hoc slots.</p>	
<p>4. Alternative mechanisms for efficient use of airport capacity</p>	
<p>We invite your views on the existence of alternative mechanisms (to the use of the 1991 TDRs) by which effective use of airports can be promoted and protected. Such alternative mechanisms may include:</p> <ul style="list-style-type: none"> • airport pricing mechanisms (e.g. through variations of airport charges); • administrative slot allocation mechanisms, including airport operators' capacity declarations; • other regulatory/administrative mechanisms; or • other market-based mechanisms (such as the trading of airport slots). 	<p>LLA has demonstrated through its Passenger Aircraft Modernisation Programme that pricing differentials can be an effective and market-based tool to influence airline behaviour and modernise fleets without regulatory intervention.</p> <p>Capacity declarations can also be effective when supported by strong collaboration between airport operators, stakeholders, and ACL. Market-based mechanisms—such as slot trading—are supported in principle, but should form part of a broader consultation on slot reform to ensure alignment with wider UK aviation policy and the future slot framework.</p>
<p>5. Wider slot reforms and any other policy suggestions</p>	

We invite your views on:

- the extent to which wider slot reforms could take account of any potential reforms to the 1991 TDRs and why;
- the extent to which local slot rules and guidance, or other local airport policies, relate to the 1991 TDRs;
- any views on the costs and benefits of how you consider the 1991 TDRs should be amended, retained or revoked; and
- any other views or evidence that you consider relevant to our review of the 1991 TDRs.

With the government's commitment to expanding aviation capacity, modernising the slot allocation system is essential to maximising the benefits of future growth. Upcoming consultations on slot reform provide an opportunity to integrate any changes to the TDRs into a single, coherent policy package.

Local rules remain useful for addressing airport-specific issues but must operate within the constraints of the WASG. Strengthening national slot rules to support robust local rule-making should be a core component of future reforms.