

CAP3202: Call for inputs – Review of the Traffic Distribution Rules 1991

January 2026

Airlines UK is the association for UK airlines¹, with members including 2Excel, Ascend Airways, AirTanker, British Airways, DHL, easyJet, European Cargo, FedEx, Jet2.com, Loganair, One Air, RVL Aviation, Ryanair, TUI Airways, Titan Airways, UPS, and Virgin Atlantic.

Airlines UK welcomes the opportunity to respond to this call for inputs regarding a review of the Traffic Distribution Rules 1991 (TDRs).

Airlines UK view:

Airlines UK represents the wide mix of UK commercial aviation, including passenger services and whole plane cargo services. Both play a vital role within the UK aviation ecosystem and wider UK economy. For example:

- Each UK-based aircraft directly supports 400 jobs and £27m UK GVA compared to 100 jobs and £7m GVA where overseas aircraft fly UK routes.
- Every two additional departing flights added by a based aircraft creates another job in the wider UK economy².
- Airlines enable UK trade, carrying 40% of the UK's non-EU trade by value in both dedicated freighters and in the bellyhold of passenger services³.
- UK residents made over 80m visits abroad in 2024 by air (over 55m for a holiday, over 25m to visit friends and relatives and c.8m for business) and over 83% of all overseas visitors to the UK arrived by air⁴.

Heathrow and Gatwick remain among the most capacity-constrained airports in Europe, with runway and terminal capacity consistently operating at or near full every day. This is why we support affordable airport expansion and making best use of existing capacity.

Under the 1991 TDRs whole plane cargo services, or general or business aviation services, cannot be operated at Heathrow or Gatwick airports during periods of peak congestion declared for each scheduling season by the CAA. In principle, Airlines UK is opposed to the general use of measures like TDRs, as we prefer open market access, consistent with the global approach to slot allocation including Worldwide Airport Slot Guidelines and consistent with best practice on neutrality, transparency, and non-discrimination.

¹ <https://airlinesuk.org/members/>

² [Assessment of the strategic and economic importance of UK-based airlines | Airlines UK](#)

³ [Assessment of the value of air freight services to the UK economy](#)

⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/leisureandtourism/datasets/ukresidentsvisitsabroad>

Nonetheless, given the congested nature of both Gatwick and Heathrow, there are a range of airline views as to the ongoing suitability of the existing TDRs regime in today's context, notwithstanding each view is consistent with the overall objective of best serving the UK consumer and economic interests.

Airline positions inevitably reflect the characteristics of their individual business models, the markets they serve, the aircraft they operate, and the airports at which they are based. Given the complexity of the aviation sector, differing priorities and preferred solutions are to be expected.

Among all-cargo operators, there are notable distinctions between charter carriers, whose activity is largely non-scheduled, and express freight operators, who run predominantly night-time scheduled services. Despite their differing models, both emphasise that each type of all-cargo operation plays a vital role in serving the South East, enabling UK trade and supporting wider economic growth.

Commercial passenger airlines will similarly highlight the significant economic, operational and environmental benefits associated with passenger services, as well as the importance of passenger choice and connectivity, particularly in the context of the resilience challenges and slot constraints faced at the affected airports. Others highlight the timing of this call for input in the context of planned airport expansions and wider work related to those projects. UK airlines will provide the CAA with direct evidence on these considerations.

UK airlines acknowledge the concern that amending the TDRs might have unintended consequences if this resulted in increased operations by lighter aircraft types typically used by general or business aviation. We consider that this would likely be disadvantageous to the already constrained capacity at these airports given the requirements of increased separation minima (resulting from wake vortices when light/small aircraft follow medium/heavy aircraft). However, it is worth noting the business model of GA/BA means their operations are largely ad-hoc and rarely for eligible series.

The overall package of regulations governing UK airport capacity slot allocation must be balanced to support the needs of commercial and air cargo operators.

-

For more information contact rob.griggs@airlinesuk.org