

Initial views and evidence: Traffic Distribution Rules

January 2026 – response provided by Manchester Airports Group

FAO: Economic Regulation team, CAA

About MAG

Manchester Airports Group (MAG) is the owner and operator of Manchester, London Stansted and East Midlands airports. We are the largest group of airports in the country and the largest private investor in transport infrastructure outside London. Collectively, our three sites directly support the employment of 44,000 people and our operations contribute over £10 billion in GVA to the UK economy. In addition, MAG owns CAVU, providing physical and digital travel services for passengers and businesses across more than 300 airports worldwide.

We are responding to the CAA's call for inputs to the review of the Traffic Distribution Rules (TDRs). These rules directly affect London Stansted, which is the primary airport for whole plane cargo services in the London system.

This initial submission will be supplemented by a more substantive response, once the draft guidance has been published.

Overview

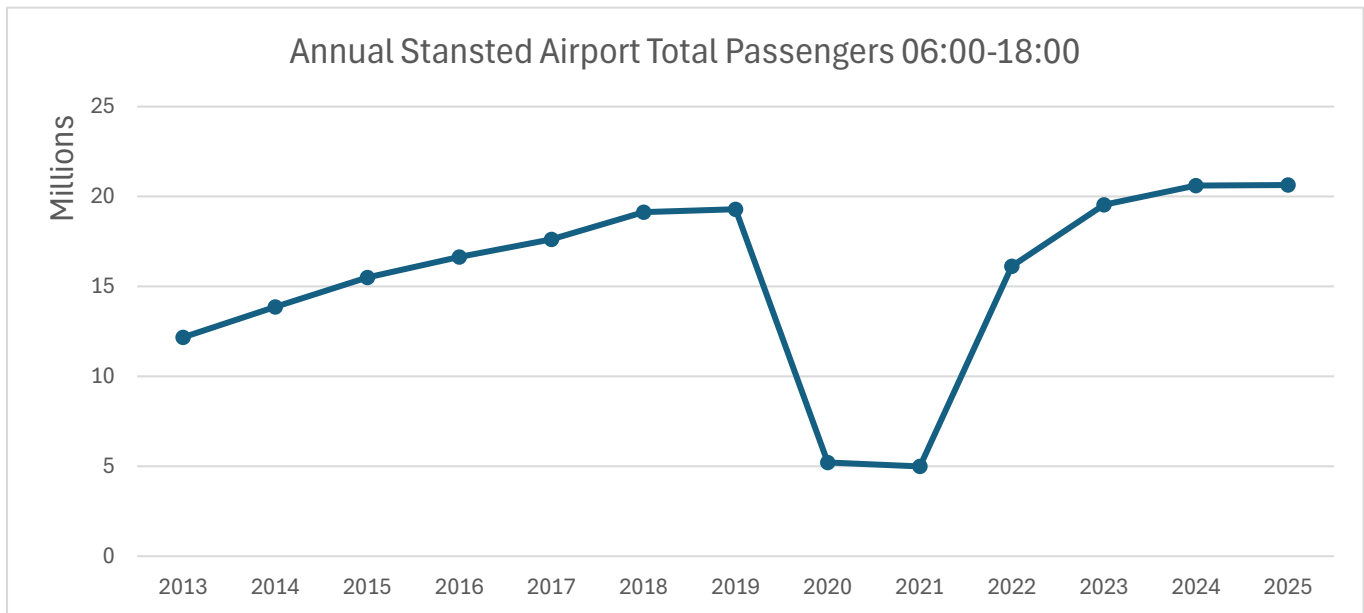
Under the 1991 Traffic Distribution Rules (TDRs) whole plane cargo services, or general or business aviation services, cannot be operated at Heathrow or Gatwick airports during periods of peak congestion without permission from the airport operator. The de facto result is that cargo operators wishing to serve the London market are compelled to use London Stansted.

The Department for Transport's (DfT) provisional view appears to be that rules are outdated and inconsistent with the Worldwide Airport Slot Guidelines (WASG) principle that 'slots are allocated at congested airports in an open, fair, transparent and non-discriminatory manner.'

The TDRs discriminate against London Stansted as it competes against Heathrow and Gatwick for commercial passenger traffic. The constraint at the other airports serves to drive cargo traffic into Stansted during peak periods.

Heathrow, Gatwick and Stansted airports all serve the same area in the UK, but peak congestion now applies to all three airports in a way it did not when the TDRs were issued. Graph A illustrates the strong growth in passengers travelling through London Stansted between 06:00 and 18:00, rising by more than 60% from 12.8 million in 2013 to 20.6 million in 2025. As such, only applying the restrictions at Heathrow and Gatwick and not Stansted is outdated.

Graph A¹



There are a variety of options to change the TDRs, depending on the objectives of the Department for Transport (DfT) and CAA. We would welcome further discussion on this matter.

MAG's response – changing the TDRs

Our preferred option is to remove the TDRs and restrictions that apply. Removing the TDRs would appear to be consistent with WASG principles and ensuring that slots are allocated efficiently in a free market and according to the principle of making best use of scarce capacity.

This should be in line with broader reforms to the slots system, including the allocation of new slots. These should be based on principles of efficiency and independence:

- **Efficiency:** Any changes to the slot system should be focused on increasing the efficient use of scarce capacity at UK airports – measures that risk constraining efficient and effective use, such as ringfencing, should be avoided.
- **Independence:** Maintaining the independence of the slots system and the coordinator, and avoiding the politicisation of the system, is key to ensuring a fair and transparent system for all parties that continues to deliver benefits to consumers.

The removal of the TDRs could be complemented by airport operators managing capacity at the local level. Either this could be done through the capacity declaration or a local rule at the coordination committee. Alternatively, the efficient use of airport capacity could be addressed through a charging mechanism.

However, if either the DfT or CAA deemed that the objective of the TDRs is still to prioritise passenger services at Heathrow and Gatwick during periods of peak congestion, or that they should remain intact, then we would expect for them to be applied to Stansted too, as a less preferred option for creating a level playing field.

¹ Data only available since 2013 (upon MAG's purchase of London Stansted).

Supporting whole plane cargo services at London Stansted

Express cargo operators require access to a London airport to serve the capital and protect just-in-time delivery models, with London Stansted accounting for around 75 per cent of volumes.² Express cargo remains an important part of the mix at Stansted and the airport will continue to serve this demand within its movement limit and the slots cargo operators currently use.

Stansted's runway is already reaching its maximum capacity at peak times. In the coming years, as the runway becomes increasingly constrained and cargo operators continue to grow, other runway capacity may be found either at Heathrow and Gatwick, aided by removing the TDRs.

In addition, in the long-term, some of the cargo growth envisaged for the London system could potentially be handled by EMA, the UK's premier dedicated air cargo hub, with minimal disruption. Its unrivalled cargo and logistics facilities, one-stop network into the major nodes of the global economy and spare capacity for growth, offers an alternative to the London system.

Further information

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² Percentage of all cargo tonnage in London flown by cargo aircraft in the last 12 months.