



Response to the CAA TDR Call for Inputs **January 2026**

About AirportsUK

This response is submitted on behalf of AirportsUK, the trade association representing the interests of airports across the UK. AirportsUK represents more than 50 airports and is the principal body engaging with the UK Government, Parliamentarians, and regulatory authorities on airport matters.

Sensitivities and Issues in this area

Capacity is constrained at some airports and therefore needs to be managed to maximise benefits for users.

Passenger and cargo operations are mutually reinforcing rather than competing, and a significant amount of cargo from UK airports travels in the belly of passenger aircraft. The scheduled passenger network provides most cargo capacity, while dedicated freighter airports add resilience, specialist capability and regional coverage. This integrated system supports trade, connectivity and strong air cargo services across the UK. Different airports across the UK play various roles in the system and, between them provide the connectivity that the UK requires from all forms of air transport.

We consider that the use of strictly limited restrictions, where needed, is appropriate and good for the consumer. The TDRs support the majority of transport users, they allow competition, lower fares and network diversification for the consumer whilst still enabling some access for dedicated cargo and GA. The TDRs ensure that scarce runway capacity is used in the most effective way at times of congestion. They prevent capacity from being used in ways that do not deliver the greatest overall network or consumer benefit, while allowing flexibility where justified.

Operational efficiency also favours passenger flights at peak times at larger airports. Busy periods are carefully planned around airline connectivity banks, allowing passengers to transfer seamlessly between incoming and outgoing flights. This connectivity is vital for maintaining the competitiveness of large airports carrying long haul traffic, where such carriers rely on short-haul feeder traffic. Introducing additional freight-only flights into these peak windows would disrupt slot coordination, reduce the number of available passenger connections, and ultimately diminish the attractiveness of the airport for both airlines and travellers.

It should be noted that the majority of air freight actually goes in the hold of 'passenger' (in reality mixed use) planes, so freight movements are frequently beneficiaries from these long-haul flights as well. It is only the sub-section of freight on freight-only flights that is affected by the restriction, meaning any economic negativities to the UK are minimised.

Time of day is a vital consideration for passengers, and as a result networks of passenger flights are built around these desirable times. Tourism, business travel, inward investment, and regional connectivity all depend heavily on passenger air services. UK airports serve as gateways linking



people to jobs, education, trade, and global markets. When slots are constrained—as they often are—airports must support the services that deliver the widest economic value.

Freight-only aircraft remain vital to the economy, and GA plays a vital role in the system. But passenger operations generate significantly higher economic multipliers for the UK, making them the logical priority during the busiest parts of the day.

Policy Position

Considering the questions put by the CAA in the call for inputs, AirportsUK would like to give a high-level assessment of the collective airport sector view. More detail can be found in individual airport's responses.

In the short term, the TDRs continue to play a necessary role in managing demand at the UK's busiest airport and in supporting outcomes that are in the best interests of the majority air transport users.

AirportsUK accepts there is potentially a benefit in the TDRs being reviewed, to modernise and ensure regulations are in line with international practices long-term. A further aspect to consider is that the TDRs were set on the basis of the congestion levels at the time. Traffic and congestion has increased at airports in general since, so the current state of congestion at the airports today would need to be part of the reassessment.

The result of this could be to adjust them, or to replace them with an alternative mechanism. However, this reform needs to fulfil the need and replicate the essential function of the TDRs, as set out above.

We are aware DfT is planning to look at broad reforms to the UK's slots system. Reform of slots policy gives opportunities to develop alternatives to the TDRs which could be utilised. We therefore request that Government as a whole does not consider the future of the TDRs in isolation, but instead takes it as one part of the whole reform process collectively. For example, there would be merit in aligning the TDR with other reforms such as on hand-back, London system rule or slot reallocation. It is not possible at this stage to say how the TDRs could be changed or replaced when the rest of slots policy is pending change. Even if no planned slots reform impacts the question of the TDRs, this needs to be established first to clarify the policy making landscape so that airports can successfully engage in a dialogue on this important issue.