

23 January 2026

**Mr. Matthew Cherry**  
**Economics Director**  
**Economic Regulation and Competition Policy**  
**Consumers and Markets Group**  
**UK Civil Aviation Authority**  
Email: [economicregulation@caa.co.uk](mailto:economicregulation@caa.co.uk)

*By email*

**Re: CAP 3202 - Review of the Traffic Distribution Rules 1991**

Dear Mr. Cherry,

I refer to the CAA's ongoing review of the Traffic Distribution Rules 1991 ("TDRs"). Ryanair welcomes the CAA's decision to review the TDRs. Increases to Air Passenger Duty ("APD") and the operational complexity caused by Brexit mean the UK and London aviation markets have become significantly less competitive. Appropriate adjustments to the TDRs can assist the UK in recovering some of the ground it has ceded to other European countries in recent years.

The TDRs continue to serve an important role in protecting consumers and maximising the economic benefit of scarce London airport capacity. Ensuring scheduled passenger airlines have access to airport slots at peak times is essential, since this access enables airlines to serve peak customer demand, delivering the economic returns required for airlines to invest in the London market, resulting in the creation of direct and indirect jobs. However, adjustments to the TDRs are required if they are to be fit-for-purpose over the coming years.

Planned capacity increases in Heathrow will not materialise this decade, while capacity increases in Gatwick are currently under judicial review. In this context, the CAA must consider how best to maximise the value of capacity elsewhere in London that is readily available. In line with the approach taken in Heathrow and Gatwick, maximising the economic value of this capacity can be achieved by banning low value cargo flights from operating during peak hours. Confining the ban on cargo airlines operating during peak hours to Heathrow and Gatwick fails to adequately consider where passenger growth will be delivered in London over the short- to medium-term.

Stansted is the only major London airport where slots are currently readily available. Extending a ban on cargo carriers operating during Stansted's peak hours (06:00-08:55, 14:00-16:55 and 23:00-23:25) would ensure the value of these slots is maximised. This ensures that regulatory intervention remains targeted, evidence-based and limited to what is necessary to protect consumers and support efficient use of constrained infrastructure, fully in line with established regulatory principles of proportionality and non-discrimination. Allocating peak Stansted slots to scheduled passenger airlines would result in increased investment and employment, reduced airport congestion, and also maximise the return on investment in terminal facilities, as detailed below.

### **1) Increased investment and employment**

Access to slots during peak times is essential to ensuring airlines can sufficiently utilise their London based aircraft. The ability to fully utilise based aircraft in Stansted will ensure airlines continue to add based aircraft to Stansted over the coming years, delivering additional jobs to the London economy.

Based aircraft will be diverted elsewhere if peak slots are blocked by lower value cargo carriers, resulting in foregone job growth.

## **2) Reduced congestion / improved operational resilience**

Reserving slots for scheduled passenger airlines during peak hours will relieve pressure on Stansted, resulting in fewer delays and higher passenger satisfaction. The 1991 TDRs provide a clear and effective safeguard to ensure that limited peak-time capacity is prioritised for scheduled passenger services, which deliver the biggest economic benefit, therefore they should be extended to Stansted.

## **3) Maximising the Return On Investment on terminal facilities**

Investment in new terminal capacity could be wasted if cargo operations constrain runway capacity. Once the Stansted terminal extension is completed, the primary limiting factor will be the runway. If runway capacity is blocked or reduced by cargo movements, the additional terminal infrastructure will not be fully utilised. Blocking low value cargo flights will prevent such a scenario occurring.

As well as the above benefits, the CAA should consider the fact that cargo operators have access to a wide range of alternative airports across the UK that are better suited to freight operations, including airports with greater night-time flexibility and lower congestion levels than Stansted.

In relation to your request for comment on wider slot reforms, we do not consider the TDRs to be incompatible with the Worldwide Airport Slot Guidelines (WASG). The rules operate as a narrowly defined legislative constraint managing capacity limitations, rather than as an unjustified allocation of slots between airlines. Slot coordination alone cannot fully address the strategic policy question of how scarce peak capacity should be prioritised between different types of traffic.

In summary, Ryanair requests that the TDRs are expanded to ban cargo flights in Stansted during the following times: 06:00-08:55, 14:00-16:55 and 23:00-23:25. We believe this is the optimal approach to maximising consumer satisfaction and the economic value of Stansted capacity for the wider London economy. Should you have any queries on this submission, please do not hesitate to contact me.

Yours sincerely,



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Eoin Kealy  
***Director of Competition & Regulatory***

cc Ronan Lennon, Director of Network Optimisation, Ryanair