

# **Review of the Traffic Distribution Rules 1991: Consultation on Draft Advice to the Secretary of State**

## **June 2026 – Response by Manchester Airports Group (MAG)**

### **About MAG**

Manchester Airports Group (MAG) is the owner and operator of Manchester, London Stansted and East Midlands airports. We are the largest airports group in the country and the largest private investor in transport infrastructure outside London. MAG's operational impacts total £14bn in GVA, while our various sites directly support the employment of 45,000 people. In addition, MAG owns CAVU, providing physical and digital travel services for passengers and businesses across more than 300 airports worldwide.

We are providing feedback on the CAA's draft advice to the SoS that the 1991 Traffic Distribution Rules (TDRs) should be revoked. These rules affect London Stansted, which is the primary airport for whole-plane cargo services in the London system.

### **Summary**

- MAG supports the CAA's recommendation to revoke the 1991 TDRs, as this is consistent with Worldwide Airport Slot Guidelines (WASG) principles and would help ensure that slots are allocated transparently and efficiently.
- At present, the TDRs distort competition by driving cargo traffic into Stansted during peak periods while protecting passenger services at Heathrow and Gatwick - a restriction that no longer reflects the fact that all three airports now face peak congestion. Removing them should therefore support a fair and level playing field.
- We agree with the CAA that revocation is unlikely to create structural changes in how capacity is used at Heathrow and Gatwick in the short to medium term, given how constrained both airports already are.
- If the CAA or DfT considers that the TDRs should be retained in some form, they should apply consistently to Stansted to avoid an uneven playing field.
- Other existing slot allocation rules and commercial incentives can support more proportionate capacity management.
- As demand for air freight continues to grow, in the longer term, East Midlands Airport has the potential to play an increased role in handling a portion of cargo associated with the wider London system.

### **Approach to revocation**

MAG supports the CAA's recommendation to revoke the 1991 TDRs. Removal of the TDRs would be consistent with WASG principles, ensuring that slots are allocated transparently and efficiently in a free market, and according to the principle of making best use of scarce capacity.

At present, the TDRs at Heathrow and Gatwick serve to drive cargo traffic into Stansted during peak periods, creating a competitive distortion to the detriment of London Stansted as it competes against Heathrow and Gatwick for commercial passenger traffic.

Heathrow, Gatwick and Stansted airports all serve London, but peak congestion now applies to all three airports in a way that it did not when the TDRs were issued. As such, applying the restrictions at Heathrow and Gatwick and not Stansted is outdated.

That said, we agree with the CAA's suggestion that the revocation of the TDRs is unlikely to have a material impact on how capacity is used at Heathrow and Gatwick in the short to medium term.

### **Timing**

We believe that revocation should take place at the earliest appropriate opportunity. However, there may be a case for a proportionate and managed transition to ensure that any short-term unintended consequences are mitigated.

Therefore, we would support the CAA's proposal for a reasonable transition period, on the grounds that this would minimise uncertainty in the short-term.

A balanced approach to implementation, recognising both the benefits of revocation and the inherent uncertainty in the market's response, is appropriate.

### **Alternative approaches if the TDRs are retained**

While MAG's preferred approach is the removal of the TDRs, we would reiterate that, if the Government or the CAA were to conclude that some form of TDR remains necessary, this approach should be applied consistently across the London system.

Therefore, any continued application of TDR-style restrictions at Heathrow and Gatwick should be extended to London Stansted to ensure a level playing field between competing airports.

### **Alternative mechanisms for managing capacity**

Beyond the question of whether the TDRs themselves are retained, MAG agrees that alternative mechanisms are needed to ensure the efficient use of airport capacity in the absence of the TDRs. These include the existing slot allocation framework, capacity declarations, local rules and general commercial incentives. Taken together, these provide a more proportionate framework than the current rules and offer further support for the removal of TDRs.

### **Supporting whole-plane cargo services at London Stansted**

Express cargo operators require access to a London airport to serve the capital - London Stansted continues to play a critical role in this market.

Stansted's runway is already constrained at peak times, and as passenger demand continues to grow, this constraint will become more pronounced. However, the UK benefits from strong dedicated cargo capability outside the London system. In particular, East Midlands Airport (EMA) provides a nationally significant cargo hub, with established infrastructure, connectivity and available capacity to support future growth.

As demand for air freight continues to evolve, EMA has the potential to play an increased role in handling cargo associated with the wider London and UK market, complementing capacity within the South East and providing additional resilience to the overall system.

**Further information**

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