



LONDON GATWICK



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Cynthia Kalyan
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Dear Cynthia,

Sent by email: economicregulation@caa.co.uk

Response to CAP 3202: Call for Inputs – Review of the Traffic Distribution Rules 1991

This letter is Gatwick Airport Limited's (GAL) response to CAP 3202, specifically the relevant areas set out in Annex 1 of the open letter published by the CAA on 18 December 2025.

1. Our business and impact of 1991 TDRs:

London Gatwick (LGW) is the 2nd largest airport in the UK and the 2nd largest serving the London area with 42.8m passengers in 2025. Due to operating with a single runway and the high demand for aviation in London; LGW is one of the most slot constrained airports in the world today. LGW is covered under the Traffic Distribution Rules 1991 (TDR). The TDR provides a mechanism which allows LGW to manage capacity constraints during peak hours of congestion, this ensures efficient use.

LGW is the world's busiest single runway operation with up to 5 movements in 5 minutes and 57 scheduled movements an hour in the summer 2026 IATA season. Due to the airline and route mix there are extremely busy peaks within the day and the seasons for which the TDR allows a declaration of peak congestion. The declaration controls the amount of whole-plane cargo and general aviation flights which can be accommodated within these hours. This helps to manage the infrastructure to prioritise scheduled passenger flights for which the demand is highest and best uses the infrastructure to promote competition and give choice to consumers. As a result, this



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prioritisation has allowed the development of commercial passenger services from around 60 airlines to over 225 destinations.

There is a cargo facility at LGW situated on the edge of the airfield comprising of 12 units totalling 261k sqft, together with forecourt space of another 240k sqft. Two cargo operators are currently located there using 93k sqft of the unit space and 84k sqft of the forecourt space. The remaining units are let to other users including GAL facilitating the border inspection post and logistics centre. The cargo operators process cargo which arrives in the hold of aircraft, mostly via widebodies from long haul destinations. Cargo is then taken via road up to the distribution centres close to Heathrow. The Northern Runway development is expected to have an impact on the location of the forecourt areas of the current facility, as part of any relocation works, no expansion of the facility is planned.

LGW also has a facility called the Sussex Suite which provides a service for general aviation, this facility has recently been internally upgraded and processes around 3-4k passengers a year.

The 1991 TDR has allowed other London airports to establish excellent cargo facilities and enabled LGW to focus on developing excellent passenger facilities to serve the large population (15m within 1 hours travel by car or rail) who live near the airport for whom it is the closest, most convenient point of departure and arrival. The development of passenger services has continued in the 35 years since the rules were put in place. Airfield space and specifically stands are heavily constrained, limiting the ability to use/expand the cargo facility, particularly in view of the developments planned as part of the Northern Runway project.

Considering the impact on LGW of changing direction from a passenger airport to a passenger / freighter airport it seems sensible to maximise the existing whole aircraft cargo facilities in the London area, or if more facilities are required, consider another airport which has more space and capacity to grow. Making best use of existing facilities is also a key pillar of the Government policy¹ under which permission has been granted to bring the Northern runway into routine use.

2. Market conditions and substitutability:

LGW runway slots are fully allocated in peak periods year-round, this includes the night period which is governed by the Night Quota. This means between the hours of 2330 and 0600 local time there is no available capacity unless the Government makes further night quota available. If more Quota becomes available there would be strong demand from existing and new carriers for additional passenger services at either end of this period.

Historically the winter Night Quota hasn't been fully allocated, and some slots were available for general aviation, however during winter 2025/6 this is not the case, and these flights (generally football related) are operating from other airports, primarily Farnborough and Biggin Hill.

¹ Airports National Policy Statement (ANPS) 2018



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Whole-cargo operators in London operate primarily from STN, LHR and LTN airports.

There have not been any scheduled freighter services at LGW during the past 20 years and only a handful of charter freight services. Freight has continued to be brought in the hold primarily by widebody services from long haul destinations; in 2025 this amounted to 120k tonnes. The highest recorded tonnage handled via LGW was 319k tonnes in the year 2000. GAL anticipate the continued increase in aircraft hold cargo via LGW as the number and frequency of long haul routes continue to grow.

3. Scope and effects of the 1991 TDRs

In their current format, the TDRs have three key effects at LGW.

1. They curb the ability for general aviation or cargo operators to gain rights to a slot series, as they are only able to operate ad-hoc (unless their historic rights were enshrined before 1991, of which there are none at LGW). In summer 2025 there were available slots in the afternoon and evening period which could have supported operations for cargo operators, however no operator applied. If TDRs were removed a cargo operator may be able to gain rights to a series of slots which they are currently unable to do. This ability will hinge on the number of slots available. As LGW continues to recover to pre-COVID levels and grow beyond, availability will be limited. Due to the nature of general aviation, it is also highly unlikely that they would be able to operate a series of slots in the way required to gain historic rights.
2. Through a Local Rule a limited number of stands are assigned to general aviation traffic enabling the remainder to be flexed for passenger services. Most stands at LGW are multipurpose, allowing for either one widebody or two narrowbody aircraft. Scheduled and charter passenger services tend to be on stand for a short time (except for based airlines who are on stand overnight), allowing optimal use of each stand. General aviation stand requirement isn't predictable, therefore with two stands allocated to them, the airport providers of these services can best allocate them according to demand. Whole-aircraft cargo operators have not operated at LGW for 20 years, however previously, they typically stayed on stand much longer than passenger aircraft, often for multiple days. LGW does not have sufficient space for stands which allow long term parking for aircraft.
3. Allowed competition of airlines and routes to flourish which have provided choice and value for money to the consumer for flights around the world.
 - a. For example, during 2025 seven new airlines started services at LGW, including 4 long haul (Gulf Air, Uganda, Kenya and Air Sierra Leone) commencing services to previously unserved destinations. In 2026, Jet2 have been able to enter the LGW scheduled market with 5 based aircraft serving 29 routes, increasing choice for the catchment area. In addition, there are new services with new airlines due to commence to Germany and the Middle East.



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- b. With the predominance of passenger flights at LGW the average number of passengers per movement in 2025 was 165, this demonstrates the high degree of efficiency of these types of flights for runway slots. The average passengers per movement for the same period for general aviation flights was 8.1.

4. Alternative mechanisms for efficient use of airport capacity

As the operation of freighters does not currently occur at LGW, if the TDRs were removed or an alternative put in place then GAL would need to update the Tariff pricing in the Conditions of Use to properly take account of freight aircraft, their use of the infrastructure and the opportunity cost of that use.

Any form of ringfencing of slots via the declaration process is likely to be sub-optimal in the use of infrastructure as has been shown by other airports worldwide (SYD being one example) who have put in this type of mechanism for other purposes. It leads to stranded capacity which then cannot be used by either passenger, cargo or general aviation services.

GAL is strongly against slot trading as it distorts the transparency and availability of capacity to all carriers via the normal slot allocation process.

5. Wider slot reforms and any other policy suggestions

Local Rules have the purpose of adding clarity or detail process to UK law. Local Rule 3 at LGW covers the process for the allocation of ad-hoc slots as updated through consultation with the Coordination Committee from time to time. If the TDRs were removed or amended, then this rule would need to be reviewed to ensure it remained fit for purpose.

In summary, the benefit of the TDR for LGW is that it enables the determination of prioritised allocation of available capacity to passenger handling services, ahead of other demands, General Aviation and Cargo. This supports the objective of optimal use of infrastructure; GAL see no rationale for the withdrawal of the TDR. When the Northern Runway is brought into routine use, additional capacity will become available and, subject to correct pricing and infrastructure provision, will allow some freighters to schedule flights if the hours of peak congestion reduce. However, without the cargo distribution facilities which exist at Heathrow, Luton and Stansted, LGW is unlikely to be attractive to many freighter companies who have built their business model around other London airports.



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Please do not hesitate to contact James Lambert (james.lambert@gatwickairport.com) if you have any questions regarding this response.

Yours sincerely,

DocuSigned by:

Jim Butler

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Jim Butler
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Gatwick Airport Limited