

Airlines UK response to CAA consultation on draft advice to the Secretary of State: Review of the Traffic Distribution Rules 1991 (CAP 3250)

May 2026

Airlines UK welcomes the opportunity to respond to the CAA's consultation on its draft advice to the Secretary of State regarding the Traffic Distribution Rules 1991 (TDRs).

Airlines UK response

As set out in our January 2026 response to the CAA's Call for Inputs, Airlines UK in principle favours open market access consistent with the Worldwide Airport Slot Guidelines and best practice on neutrality, transparency, and non-discrimination. On that basis, we are not generally supportive of mechanisms like the TDRs as a permanent feature of the capacity management framework.

At the same time, Airlines UK represents the full breadth of UK commercial aviation, and member views on the appropriate timing and approach to reform reflect the diversity of business models across the sector. Passenger airlines and cargo operators have differing perspectives on how scarce capacity at the most congested airports in Europe should be managed, and both sets of interests are consistent with the overarching objective of serving UK consumers and the wider economy.

Immediate practical impact and next steps

Airlines UK notes the CAA's assessment that revocation is unlikely to have a material impact on how capacity is used at Heathrow and Gatwick in the short to medium term. Similarly, the business model of general and business aviation is largely incompatible with securing regular slot series at highly congested hub airports. On this basis, we recognise that revocation should not in itself materially alter operational outcomes in the near term. This is also why some Airlines UK cargo operators do not consider amendments to Condition C4 a critical part of the CAA's advice to the Secretary of State in respect of the 1991 TDRs, which might be assessed more appropriately within the wider review of Heathrow's economic regulation and expansion project.

Airlines UK considers it important that any decision on the TDRs is understood in the context of the wider regulatory reform agenda. The Government has indicated its intention to review the Slot Regulations, and significant capacity expansion is planned or under consideration at a number of London-area airports, including Heathrow and Gatwick. These developments will inevitably require a comprehensive reassessment of how scarce capacity is allocated and managed across the London system. Airlines UK would encourage the CAA and Government to ensure that any revocation of the TDRs is accompanied by clarity on how those broader issues will be addressed as part of slot reform and to ensure the sequencing does not prohibit fair access for to any new capacity.

Airlines UK looks forward to continued engagement with the CAA and DfT as this process develops.

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