

Sent by email



23 January 2026

Mr Matthew Cherry
Economics Director
Economic Regulation and Competition Policy
Consumers and Markets Group
UK Civil Aviation Authority
11 Westferry Circus
Canary Wharf
London
E14 4HD

Head Office

Rourke House
3 Watermans Business Park
Kingsbury Crescent
Staines-upon-Thames
TW18 3BA

Tel: 0208 564 0608
Email: richard.cann@acl-uk.org

Dear Matthew

CAP 3202: Call for inputs – Review of the Traffic Distribution Rules 1991

Further to your letter of 18 December 2025 calling for input into the above review of Traffic Distribution Rules 1991. ACL welcomes the opportunity to respond and has limited our answers to the questions relevant to our activities. As our response is purely factual, we do not consider any of our submission to be confidential.

Q1 About your business and the impact of the 1991 TDRs

Airport Coordination Limited (ACL) is the world's leading independent slot coordinator and is designated by the Secretary of State to perform this function at designated UK airports. We are responsible for allocating scarce airport capacity at airports designated as coordinated such as Heathrow, Gatwick and Stansted. The aim is to ensure fair access for airlines under the UK Slot Regulations, enforcing the usage rules, and monitoring misuse, with powers to issue sanctions like fines for non-compliance. The key principles are neutrality, transparency, and independence. In performing this function, we are required to consider the Worldwide Airport Scheduling Guidelines (WASG), TDR's and Local Rules as agreed by the respective airport's coordination committees.

The TDR's impact our ability to allocate slots, historic and ad hoc to Cargo and GA/BA operators at the airports specified in the TDR's. This applies across the scheduling process including at initial coordination, which is usually an operator's best opportunity to obtain slots. The TDR's also restricts opportunity to secure ad hoc slots within season due to it restricting ACL from allocating slots in the hours of peak congestion where the airport has not given permission.

With the TDR's in place, it effectively means that we don't consider certain types of traffic, being Cargo and GA/BA, for slot allocation at Initial Coordination. This puts these operators at a major disadvantage as Initial Coordination is usually the best opportunity for operators to gain slots, either at all or close to their required times. The implementation of the TDR's is as odds to the role of a Coordinator to carry out its functions in a neutral and non-biased way. To give all operators equal opportunity to gain access to airports in line with the allocation priorities defined within the UK Slot Regulation.

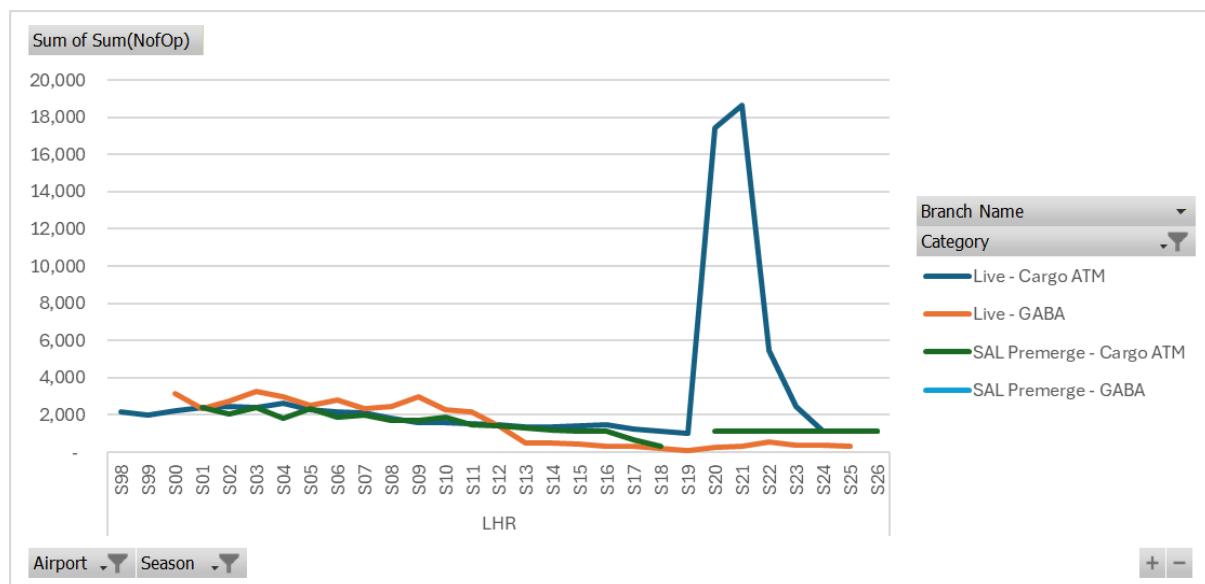
If the TDR's were removed, it is likely that Airports would adapt the capacity constraints in their capacity declarations to achieve the same outcomes. This could be in the way of limiting stand availability to certain traffic types or limiting the capacity of processing functions such as cargo facilities. This assumes that had the airport sought such traffic that it would have granted access as possible under the TDR's. Should the airport decided to amend its capacity declaration in such a way it would at least be consulted with stakeholders allowing all types of operators to provide feedback on the change. However ultimately, it's within each airports gift to determine its own capacity under Article 6 of the UK Slot Regulation.

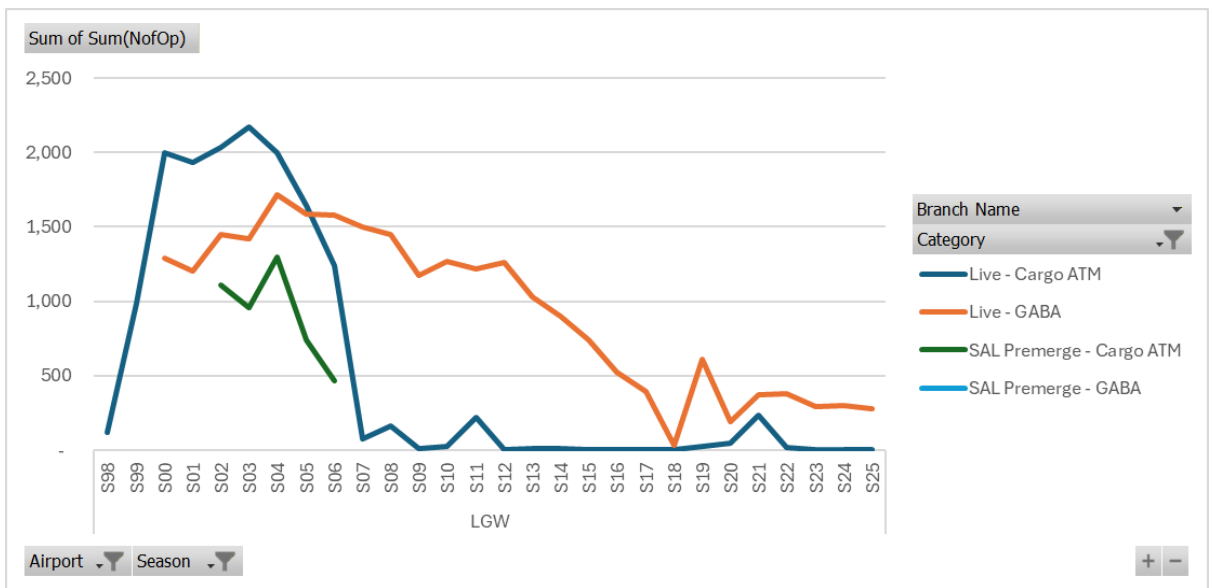
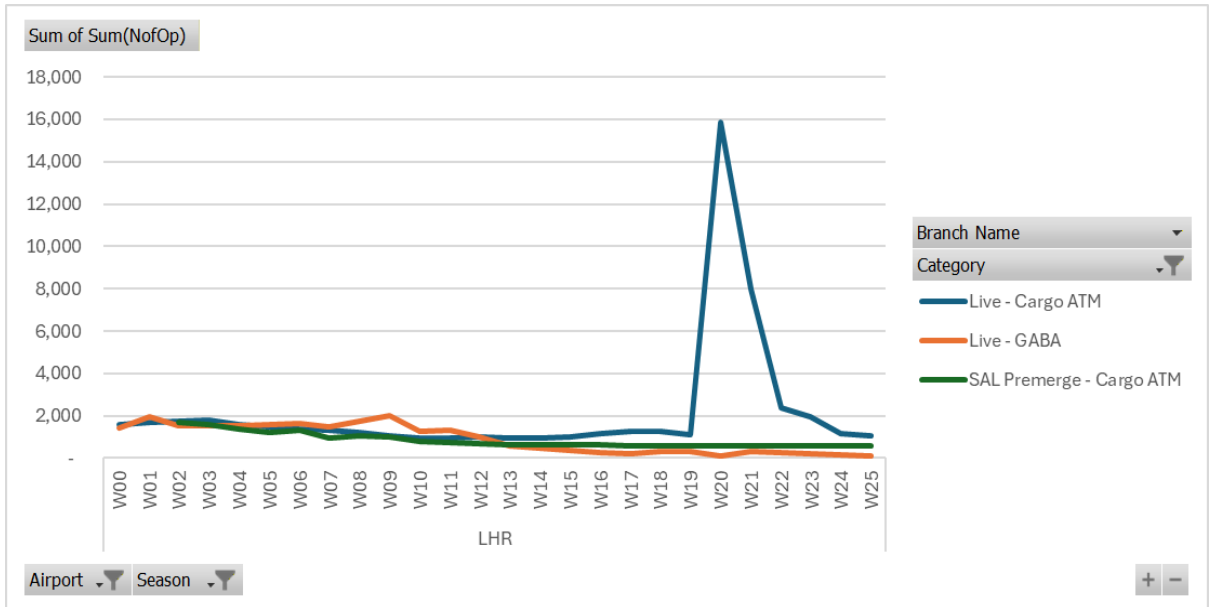
Q2 Market conditions and substitutability

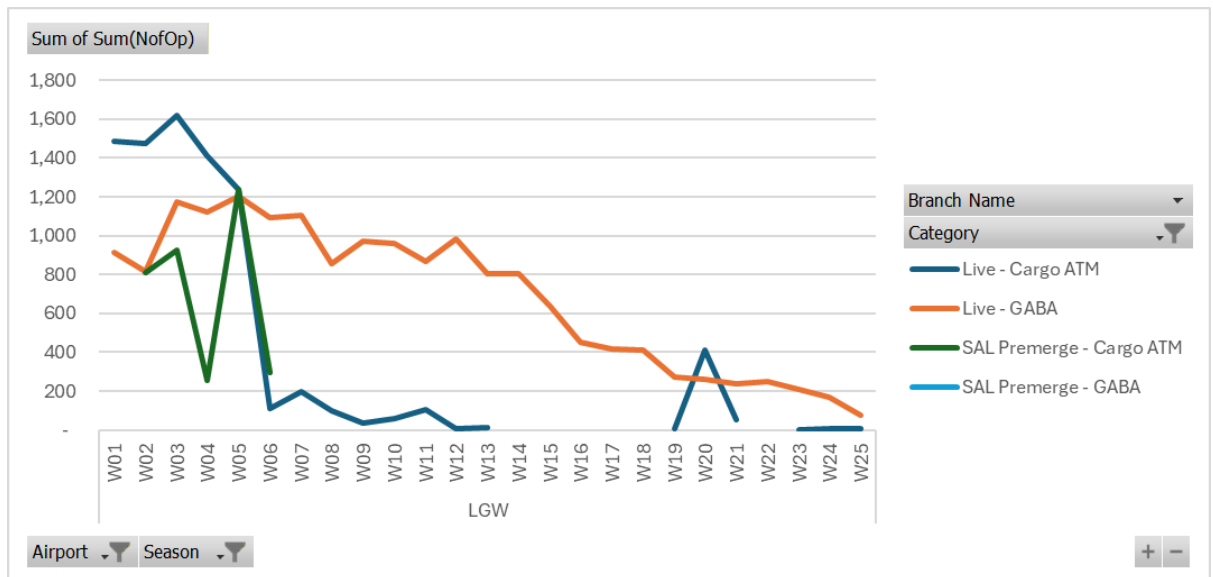
The following charts show the allocation of slots to cargo and business/general aviation across several IATA scheduling seasons. For each chart we identify the allocation at initial coordination (SAL Pre-merge) and what happened (live) in the scheduling season.

Heathrow & Gatwick Airports

At Heathrow where the TDR's prevent cargo and restrict GA/BA there has been limited change and growth as shown for cargo by the orange and blue lines in the chart below, excluding the cargo spike during COVID. The change between initial coordination and the live seasons remains steady with no major margins. At Gatwick, cargo and GA/BA declined around 2006 as seen in the yellow and blue lines and has remained subsequently low since. This accepts that other constraints in the case of Heathrow prevented growth in any traffic type and in the case of GA/BA at Gatwick the impact of Local Rule 3.

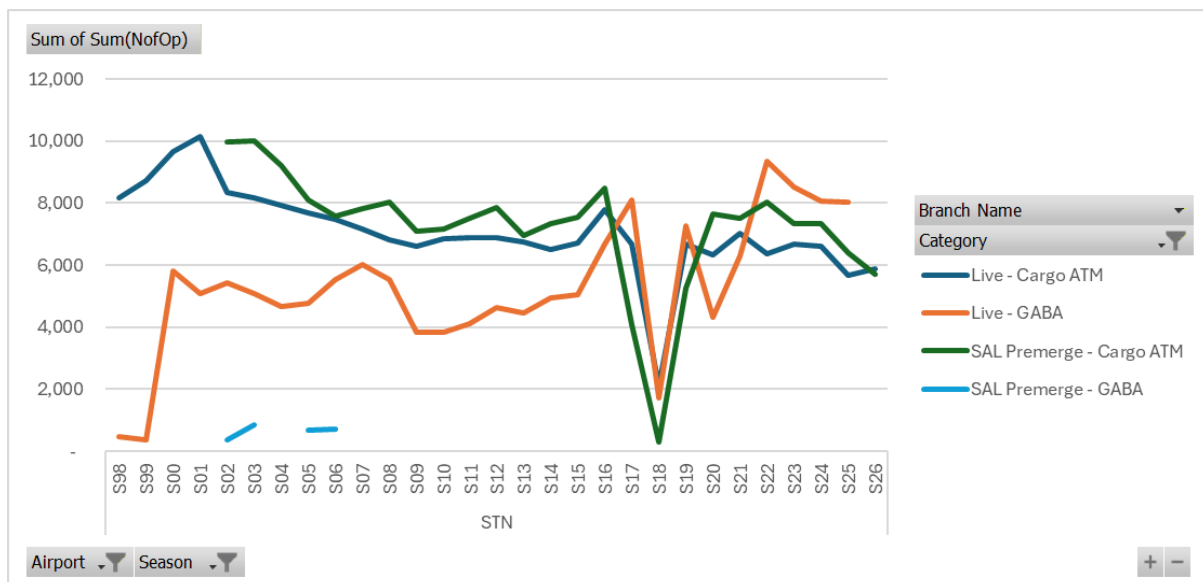


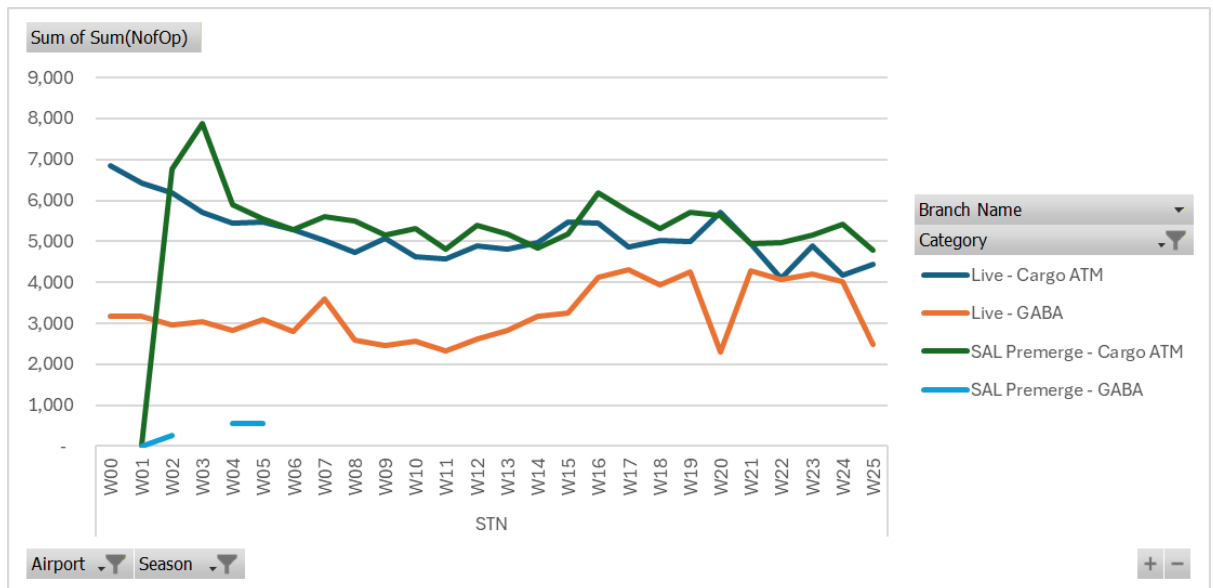




Stansted Airport

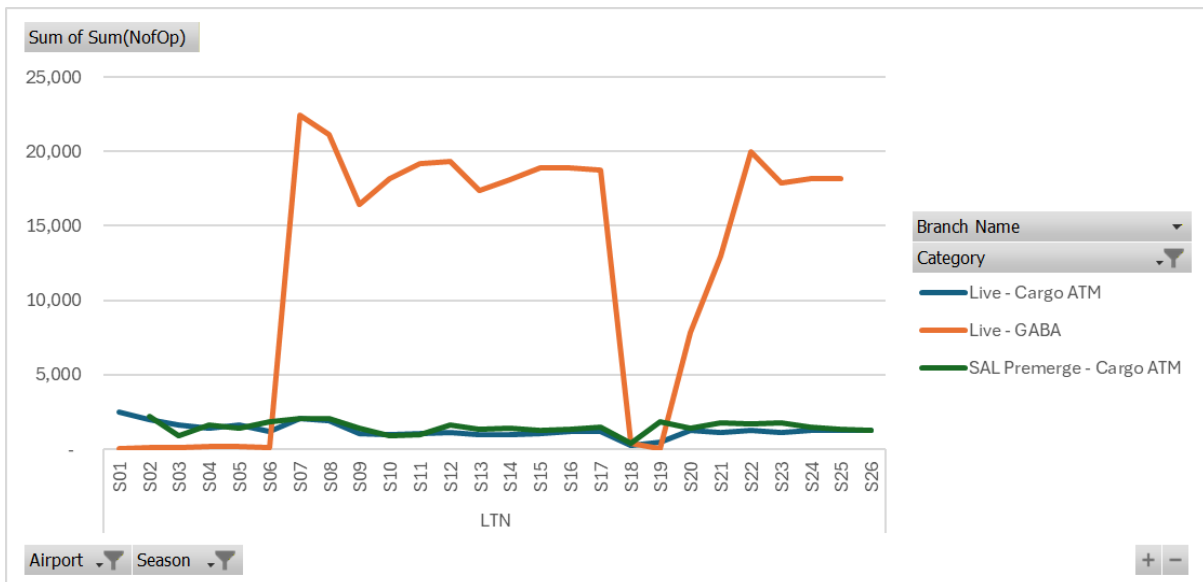
At Stansted Airport there are no restrictions on GA/BA and as the airport has granted permission, we have seen growth in the sector as shown by the orange line. Cargo has been in decline as shown in blue but because of other factors such as loss of historic's which subsequently get reallocated to other traffic types rather than because of the TDR's.

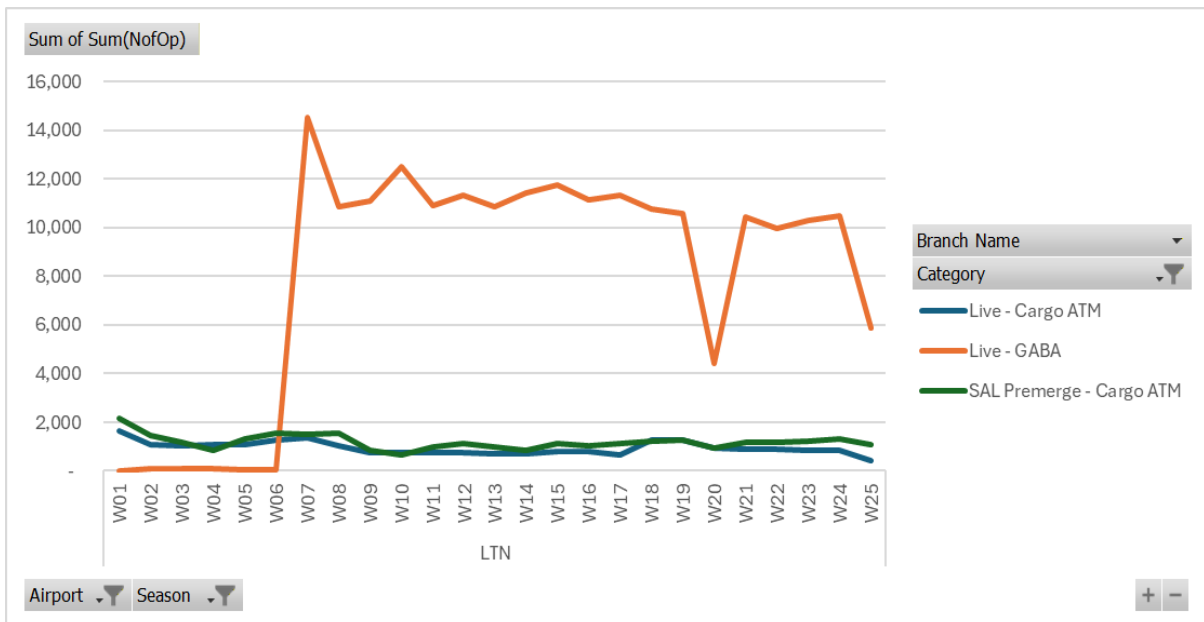




Luton Airport

At Luton Airport where the TDR's do not apply, there has been limited change in cargo/freight traffic across the seasons as shown by the blue and green lines. GA/BA as shown in orange remained steady in the summer seasons with a slight decline in the winter seasons.

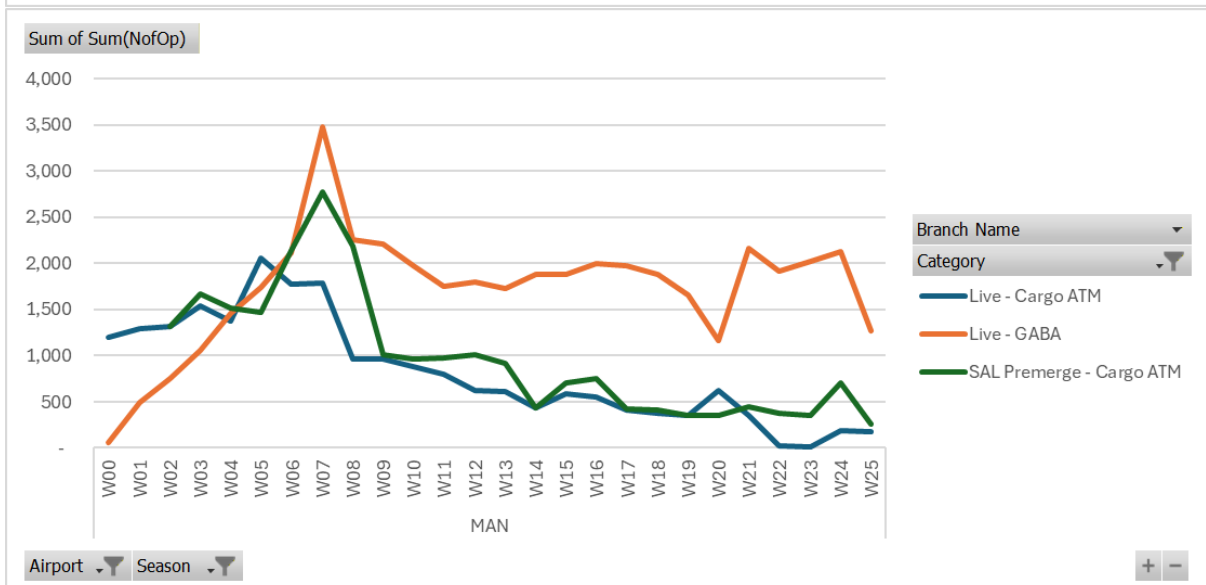
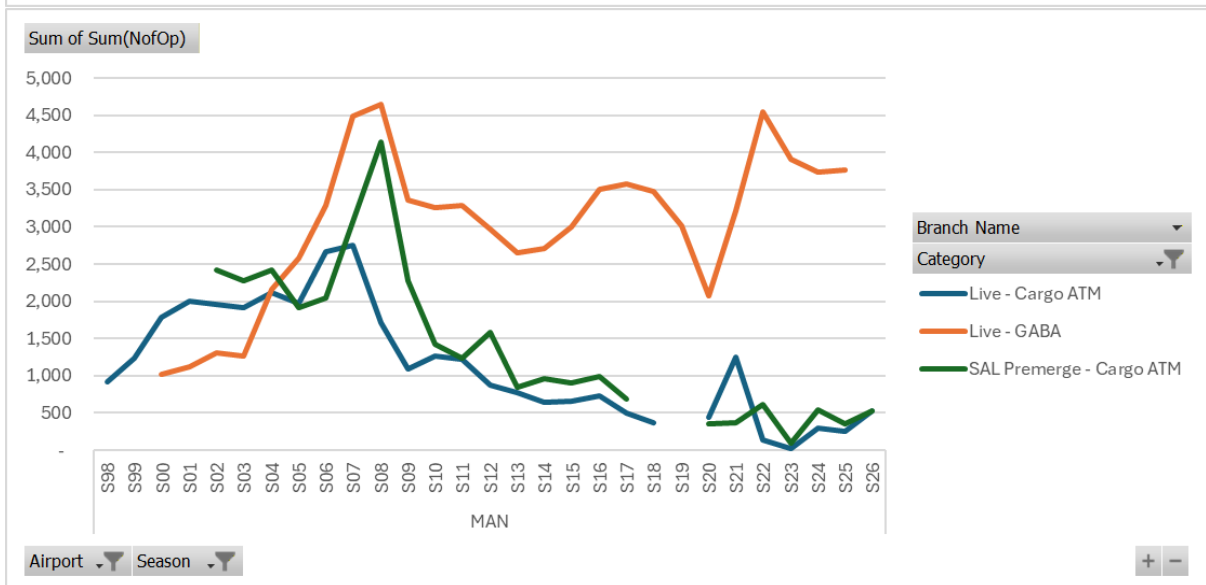
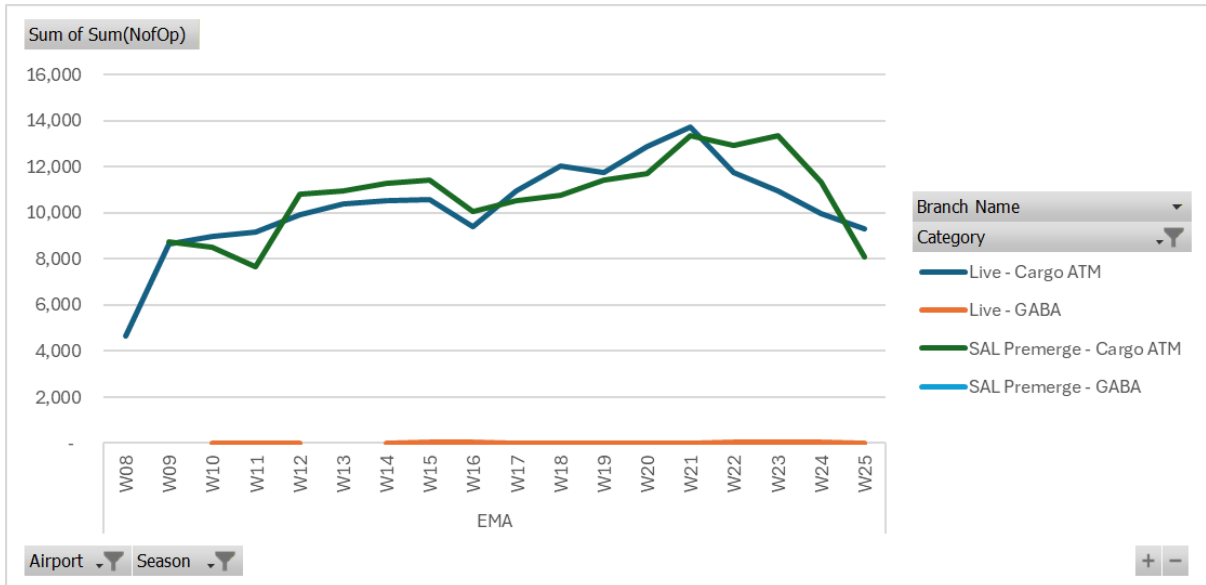




East Midlands and Manchester Airport

For comparison, please see Cargo/GA at two further airports not impacted by the TDR and outside London. East Midlands has seen a gradual increase in cargo until recent seasons as shown in the green and blue lines. Manchester has seen the opposite with a slight decline in cargo traffic. East Midlands airport is a facilitated airport so is only subject to a voluntary slot scheme whereas Manchester is coordinated.





Q4 Alternative mechanisms for efficient use of airport capacity

In defining efficient use of the airport capacity, ACL considers the use of the infrastructure declared by the airport. The effect of the TDR's in relation to capacity allocation is described in our response to question 1.

In the absence of the TDR's, the allocation of airport capacity would be governed solely by the UK Slot Regulation. This requires ACL to allocate slots in compliance with the capacity parameters declared by the airport managing body as required under Article 6 of the Regulation. Any capacity limitations that are declared by the airport, that relate to the operations currently included under the TDR's, would need to be considered. For example, should there only be one cargo parking stand declared, then ACL can only allocate slots to a cargo operator if that stand is available. Therefore, without the TDR's, we may expect to see more airport parameters declared to manage constraints currently not necessary due to the TDR's. The removal of the TDR's will require ACL to purely consider the allocation criteria contained in the UK slot Regulation and the additional criteria under section 8.4 of the WASG.

Whilst outside of ACL's area of responsibility, we would also expect to see airport charges as a way of influencing types of traffic where permitted.

Slot exchanges as permitted in the UK Slot Regulation, that involve the traffic types contained in the TDR's would not be permitted if that would result in them being in a period of peak congestions (if the airport has not given approval). Without the TDR's, ACL would assess the requested exchange against the declared parameters of the airport after ensuring the parties are entitled to hold slots. Subject to falling within these parameters, an exchange would be permitted. This would permit cargo flights to obtain slots via the secondary market which is not currently possible in periods of peak congestion.

Q5 Wider slot reforms and any other policy suggestions

Local Rules cannot facilitate a policy that goes against the UK Slot Regulation or other rules for the allocation of slots including the TDR's. Local Rule 3 at Gatwick provides the airports permission and sets out the conditions that ACL must apply to grant slots to general and business aviation. Without the TDR's, ACL would consider the current wording of the Local Rule in section 3.1- 3.3 as limiting access to capacity for one type of traffic and may even be considered as discriminatory. In such a circumstance, ACL would seek for this to be removed and if not possible, ACL would be required to approve slots from general/business aviation operators as it would any ad-hoc operation (section 2) subject to the capacity parameters declared by the airport operator and therefore ignore that element of the Local Rule.

If you would like to discuss or require further information, please do not hesitate to contact me.

Yours sincerely

Richard Cann
Head of Coordination