

TUI GROUP RESPONSE TO TRAFFIC DISTRIBUTION RULES 1991 CONSULTATION

TUI Group is pleased to submit its initial views to the CAA review of the Traffic Distribution Rules 1991.

TUI Airways is the fourth largest UK AOC airline, operating from 20 UK airports with c.70 aircraft and serving over 10m passengers each year. Gatwick is our second largest UK base, with 16 aircraft in Summer 2025 flying to 58 international destinations. Almost 1,000 TUI employees work out of the airport – a mix of flight crew, cabin crew, engineers, and customer care colleagues. We do not operate from Heathrow airport.

Under the Traffic Distribution Rules (TDRs) 1991 whole plane cargo services or general or business aviation cannot be operated at Gatwick airport during periods of peak congestion declared for each scheduling season, without permission from the airport operator. The hours of peak congestion at Gatwick during Summer 2025 were declared as follows:

Arrivals & Departures

Monday	0500-1555	2200-2255			
Tuesday	0500-0855	1000-1055	1200-1455		
Wednesday	0500-0855	1300-1455	2000-2255		
Thursday	0500-0855	1100-1455			
Friday	0500-0855	1000-1655	2200-2255		
Saturday	0500-0555	0700-0755	0900-0955	1100-1155	1300-1455
Sunday	0500-0555	0800-0855	1100-1855	2200-2255	

The purpose of the TDRs was to ensure priority was given to passenger services for Gatwick’s slots in peak hours to make the best use of limited airport capacity. While the rules may feel anachronistic, passenger traffic and congestion at Gatwick have significantly increased since 1991. For example, in [1991](#) Gatwick served 18.7m terminal passengers and handled just over 160k air transport movements. By [2024](#), terminal passengers had increased to over 43m and there were over 260k aircraft movements. While the airport infrastructure has expanded and improved over this period, Gatwick currently remains a single runway airport – indeed the busiest in the world. While slot and airport infrastructure capacity remains so constrained and congested, the need to make the best possible use of limited airport capacity is stronger than ever.

The TDRs support operational efficiency at capacity-constrained Gatwick Airport. Scheduled passenger services achieve significantly greater passenger throughput per slot than business aviation services. The TDRs also support the prioritisation of economic value. A passenger aircraft typically produces far more direct and indirect economic activity than a freighter occupying the same slot. This is because passenger services generate value from multiple streams including fares, ancillary revenue, retail and food-and-beverage spending in terminals, car parking, rail links, concessions, hotels, and higher long-term economic uplift (e.g. tourism, business travel, labour mobility). That’s not to say that cargo-only flights are not economically important — particularly for high-value or time-critical goods, supply-chain resilience, and e-commerce fulfilment – but they generate less value than passenger services.

The current rules protect capacity for leisure passenger services that deliver huge economic and social value through the democratisation of air travel. This ensures holiday affordability for British consumers through flight capacity and operational efficiencies that would be compromised if peak capacity were diverted to lower-density operations. Furthermore, the rules facilitate inbound and outbound tourism, generating substantial domestic economic activity that would be jeopardised by any significant reallocation of capacity.

The TDRs align with the UK's carbon reduction commitments and Net Zero strategy by preventing the displacement of efficient mass passenger transport with less efficient business aviation or cargo-only alternatives during periods when airport capacity is most constrained.

Viable alternatives exist for services currently restricted during peak periods. Business aviation at London-area dedicated GA airports (Biggin Hill, Farnborough, Oxford) is growing strongly and accommodating demand. Cargo activity has grown strongly at East Midlands Airport and Stansted Airport. London's multi-airport system and the wider UK aviation network functions effectively under the TDRs, with specialised operations and facilities developing at airports best suited to particular traffic types. This specialisation has allowed smaller airports to develop business models that benefit from traffic that would otherwise be concentrated at major hubs, contributing to regional economic development and a more resilient national aviation system.

Cargo-only operations require specialised handling equipment, dedicated apron space, and freight processing facilities that Gatwick does not currently have and has limited capacity to accommodate. By contrast, dedicated cargo airports have greater handling efficiency for freight operations. The TDRs therefore direct cargo operations to the facilities best equipped to handle them efficiently, resulting in better service levels for freight operators and more effective use of national aviation infrastructure.

Unlike passenger operations, which must adhere to schedules convenient for human travellers, cargo operations possess more inherent flexibility that makes them better suited to off-peak operations. Most cargo consists of general freight, which is typically less time-definite and moved on standard service levels rather than within accelerated 24-hour delivery windows required by time-critical express freight.

Conclusion

The restrictions on cargo-only flights during peak periods are justified by the substantial economic, operational, and environmental advantages of prioritising passenger services, combined with the availability of viable alternatives for cargo operators.

A modification of the TDRs would introduce significant risks to the UK aviation system. Capacity disruption is possible as introducing unpredictable operations during peak periods would undermine the carefully calibrated scheduling of passenger services that maintains operational resilience. This would have cascading effects throughout the air transport system, reducing on-time performance and increasing delays for all users. Economic harm would result from reduced slots for scheduled services. Consumer detriment would follow through potential fare increases if capacity for leisure flights is constrained, reducing access to air travel for price-sensitive consumers.

Both Gatwick and Heathrow are embarking on expansion projects. There may be a case for revisiting the TDRs once significant new airport infrastructure and slot capacity is in place but acting now would be premature.