# Airways NZ Queenstown Airspace Petition Version 2

## Summary of Submissions Received, and Airspace Designation Decision by CAA New Zealand.

# Table of Contents

## Introduction

On 5 May 2025, Airways Corporation of New Zealand Limited (Airways NZ) submitted an application requesting changes to the Queenstown Control Zone (CTR). The application was seeking to reduce the size of the existing Queenstown CTR, introducing 3 additional Transit Lanes, amending 3 existing Transit Lanes, withdrawing 3 Visual Reporting Points (VRP), moving 1 VRP and designating 7 additional VRPs; see Appendix A, Airways Corporation of New Zealand Limited – Queenstown Airspace Petition Volume One, Version 2.0, dated 29 May 2025, and also Appendix B which depicts the indicative current and proposed Transit Lane areas in the Queenstown CTR. Further, consequential changes would include but were not limited to adjustments to the Common Frequency Zone (CFZ), updates to the applicable Aeronautical Information Pages (AIP), changes to Queenstown VFR Arrival and Departure procedures, Queenstown ATC procedures. Airways safety assessment process, the Initial Safety Case Impact Assessment (ISCIA) result reported the proposed change was considered a minor one.

## Airways Rationale for the Proposed Changes

2. Airways NZ petition stated the reason for the proposed airspace changes was to better comply with CAR 71.55(b) in that the Queenstown Aerodrome control zones should be as small as practical, consistent with the need to protect the flight paths of IFR Flights arriving and departing from the Aerodrome. In doing so, the Queenstown Aerodrome Air Traffic Services (ATS) could better manage Instrument Flight Rules (IFR) and Visual Flight Rules (VFR) aircraft arrivals and departures. Airways NZ has also conducted a thematic review of ATS operations at Queenstown in the latter part of 2024, including a series of meetings between Airways staff, the Queenstown Milford (QMUG) user group and the Queenstown Airport Corporation (QAC), seeking to address items raised in the review.

3. In early 2025 Airways NZ applied an Interest Based Problem Solving (IBPS) methodology in workshops to better focus on aviation challenges, interests and resolutions. The workshops included senior QMUG members, QAC and Airways Management staff.

4. The airspace amendment petition submitted on the 5 of May 2025 was to support a proposed implementation in the AIP 25/12 AIRAC cycle, effective 27 November 2025. This would coincide with the 27 November 2025 Visual Navigation Chart (VNC) update, needed to depict the applicable changes to the Queenstown Control Zone and surrounding Transit Lanes and General Aviation Areas.

## Civil Aviation Rule Context

5. Civil Aviation Rule (CAR) Part 71 provides the regulatory context to designate and classify airspace. Specifically, 71.57 prescribes the criteria that the Director must consider in designating transit lanes:

> ***71.57 VFR transit lanes***
>
> *(a) The Director may designate a portion of controlled airspace as a VFR transit lane for either or both of the following purposes:*
>
> *(1) separating transiting VFR traffic from arriving and departing IFR flights:*
>
> *(2) permitting transiting VFR traffic to operate within the VFR transit lane without requiring an ATC clearance.*
>
> *(b) A VFR transit lane must be clear of airspace that encompasses IFR arrival and departure procedures within that controlled airspace.*
>
> *(c) The Director must—*
>
> *(1) ensure that buffer zones are provided between the nominal flight paths of arriving and departing IFR flights and each VFR transit lane; and*
>
> *(2) identify each VFR transit lane by the ICAO nationality letters of the State providing the air traffic control service followed by the letter "T" followed by a number.*
>
> *(d) A VFR transit lane is class G airspace and may only be active during the day.*

6. The application requested the introduction of Transponder Mandatory (TM) in the Transit Lane areas. CAR Part 71, Sub Part E covers the criteria the Director must consider in designating TM airspace.

> ***71.201 Transponder mandatory airspace within controlled airspace***
>
> *The Director may designate a control area or a control zone, or any portion of a control area or a control zone, as transponder mandatory airspace if—*
>
> *(1) the operation of transponders is required for the provision of an air traffic control surveillance service; or*
>
> *(2) the Director determines that the traffic density in the airspace requires the operation of transponders to reduce the risk of an airborne collision with those aircraft that are required to be fitted with an airborne collision avoidance system.*

<u>CAA view:</u>

The application requires Transit Lanes to be designated by the CAA as coincident Special Use Airspace which is also Transponder Mandatory (TM). This interpretation is not consistent with the guidance contained in CAR Part 71.57 VFR Transit Lanes and

has not been tested legally. Part 71 criteria do not currently enable Class G airspace (Transit Lanes) to be designated TM, nor is there any historical examples of this arrangement being implemented in the existing airspace system.

7. CAR Part 71, Sub Part C, further describes the criteria for classification of airspace. These criteria are stipulated in ICAO Annex 11, International Standards and Recommended Practices, Air Traffic Services requirements (part 2.6 Classification of airspaces). Queenstown Control Zone (NZA756), lower limit is the surface extending to the upper limit, 7500 ft AMSL, and is classified Class C airspace. Rule part 71.105 requirements being:

> *71.105 Class C airspace*
> *Any portion of airspace that is designated as a control area or control zone under rules 71.51(a) or (b) must be classified as Class C airspace if the Director considers it necessary in the interests of aviation safety that—*
>
> *(1) separation is required between—*
>
> *(i) IFR flights; and*
> *(ii) IFR and VFR flights; and*
> *(iii) IFR and special VFR flights; and*
> *(iv) special VFR flights when the flight visibility is reported to be less than 5km; and*
>
> *(2) traffic information must be provided to VFR flights about other VFR flights; and*
>
> *(3) traffic avoidance advice must be provided to VFR flights on request*

CAA View:
The proposed changes would approximately double the lateral extent of the VFR Transit Lanes. These would become Glass G airspace during the day, and as such no air traffic service would be provided inside the transit lane, during daylight hours.

See indicative current and proposed Transit Lane areas in the Queenstown CTR are shown at Appendix B; in addition, the three current General Aviation Areas also within the CTR are depicted.

## Queenstown Airspace Designations - Historic Context

8. CAA records indicate an Air Traffic Control service was first established at Queenstown aerodrome in 1993 replacing the previous aerodrome flight information service. The associated controlled airspace was established surrounding the aerodrome below 9500 feet (ft), designated as Class D airspace.

9. In November 2012 airspace changes were made as part of the introduction of performance-based navigation procedures. At that time the airspace application also included a request for a western transit lane. Following consultation and CAA assessment the western transit lane request was declined at that time. The CAA rational for declining this petition noted the purpose of an aerodrome control service is to ensure all aircraft within the controlled airspace receive a control service, and all flights are known to ATC. Introducing transit lanes to controlled airspace degrades the

purpose of the underlying air traffic control service. Either a control zone is needed, or it is not.

10. In 2013, a CAA report on the Queenstown airspace settings made the following conclusions:

- The Queenstown airspace operations have developed and expanded significantly since the introduction of ATC, in both scale and types of operation.
- Current operations are vastly different and more complex than when the Class D airspace was established increasing the airspace risk substantially.
- Scheduled passenger flights have not only increased significantly in numbers of aircraft, but the predominant aircraft type in operation now is turbojet compared to turboprop.
- Passenger numbers have trebled in the past 20 years and are projected to treble again in the next 25 years.
- The airspace density has increased markedly in the past 20 years and will continue to become denser over time as the adventure tourism industry develops. This density change is a major risk factor.
- The Queenstown current airspace classification of Class D does not adequately protect IFR flights, especially large domestic and international turbojet operations. This is evidenced by the fivefold increase in recent times of airspace safety occurrences
- Recent change to instrument procedures and VFR operations is a short-term safety tool but the airspace classification along with greater air traffic management will provide a longer-term solution.

11. The conclusions of the 2013 report ultimately resulted in a body of work which culminated in the reclassification of the Queenstown Control Zone from Class D to Class C airspace. Airways NZ was engaged throughout this change process as part of CAA's required consultation process. The consultation acknowledged the impact of the controlled airspace change would likely be a reduction in traffic flow. The change would also need to review the radio coverage within the control zone. Whilst it was anticipated that VFR Traffic demand would likely result in increased pressure on ATC, Airways was unsure of the impact the change would have on overall ATC workload.

12. Ultimately Airways determined that with class C airspace there will be less flexibility resulting in greater delays for VFR and maybe some suspension/preclusion of existing VFR operations. To a lesser degree some delays and restrictions to IFR operations are likely to occur.

13. Following stakeholder and public consultation, CAA assessment and further collaboration with all stakeholders to prepare for the change, Queenstown CTR was designated as Class C airspace on 10 November 2016.

## Consultation and Submissions for the Proposed 2025 Queenstown Airspace Changes

14. CAR Part 71.9 requires the Director to consult independently with affected persons, organisations, and representative groups within the aviation industry before making a designation or classification of airspace.

15. The CAA consultation document notifying the Airways NZ proposal was sent directly to the organisations listed at Appendix C (Consultation Distribution List) for consideration and comment and was also published on the CAA website from 9 June 2025 to 30 June 2025 at 2025 airspace reviews | aviation.govt.nz

16. Notifications were also sent to CAA email notification subscribers to Airspace Notifications – Briefing Areas 7, 8, 9 and 10 (as shown in **Appendix C**)

17. Mindful of the shortened public consultation timeline CAA wishes to thank submitters for their consideration and feedback provided regarding the proposed Queenstown CTR changes.

18. For this proposed airspace change 6 submissions were received, these are recorded in Appendix D including CAA comment on the submission points where applicable. Five submissions were in general agreement to support the proposal. One of the submissions in support of the petition, requires regulatory settings that are not currently permitted by Civil Aviation Rules or ICAO standards. One submitter, an airline operator strongly opposed the proposed changes.

## CAA Considerations on Airways NZ's Queenstown Airspace Petition

19. The Queenstown Airspace Petition provided to CAA consisted of the following components:

a) Queenstown Airspace Petition Volume One, Version 2.0 document (38 pages)
b) Queenstown Airspace Petition Volume Two, Evidence of Consultation document (75 pages)
c) Queenstown Airspace Petition Safety Statement Version 1

### Assessment of the Petition Against Airways Safety Management System

20. Operational changes must be managed in accordance with Airways Safety Assessment for Operational Change Document which forms part of Airways NZ exposition. This document details the fundamental process from which all safety arguments in support of significant operational changes are framed is the Initial Safety Change Impact Assessment (ISCIA). The output of the ISCIA determines the overall

risk rating for any given change and dependent on that risk rating, whether the operational change will be supported by a safety plan and one of the following:

a) Safety Statement – ISCIA Minor Safety Impact
b) Safety Assessment – ISCIA Moderate Safety Impact
c) Safety Case – ISCIA Significant Safety Impact

21. Per page 1 of the ISCIA for the proposed changes to the Queenstown airspace and consequential changes to the management of VFR and IFR separation, Airways assessed the impact to safety as 'Minor'. As a result, only a Safety Statement document was produced in support of the proposed changes. Further clarification was sought from Airways given the minor safety impact rating being in stark contrast to the scope of the change and the complexity of the operating environment. The same complexity which itself was provided as rationale for the airspace change in the first place.

22. The regulatory subject matter view is that the ISCIA for this petition took a too narrow view of the safety impact. This outcome is understandable given the proposal results in significant reductions in the responsibilities of the aerodrome control service to manage the existing air traffic. This safety risk must then be accepted by the VFR Pilot, and the CAA should the Director accept the petition.

**Consultation on the Petition**

23. The Airways NZ submissions evidenced a significant level of engagement with stakeholders initiated on April 23rd, 2025. Prior to submitting the airspace proposal on 5th May 2025. The application documentation included information on an Interest Based Problem Solving (IBPS) methodology used during a series of workshops in early 2025. These workshops sought to take a longer-term focus on aviation challenges, interests and resolutions in this challenging environment and complex airspace area.

24. The IBPS workshops identified sixteen factors as Issues/Opportunity Development. The workshop identified various issues associated with ATC workload to manage VFR and IFR traffic at current levels. The long-term impact of this has been the extended length of time for ATC staff to validate at Queenstown Tower and high failure rates. This will have a compounding long term effect on the ATC team itself. Whilst not unexpected given the complexity of the airspace, the petition does not provide any discussion of changes/improvements in ATC validation training as potential alternatives.

25. An additional issue not covered in the workshops was consideration of the resourcing levels, commensurate with the required level of Air Traffic Service either current or future. It is also unclear as to what impact the current aerodrome infrastructure master planning will have on traffic flow to and from the aerodrome control zone.

26. The Airways NZ proposal noted the intention behind their proposal was to better manage Queenstown Air Traffic Services (ATS) and Visual Flight Rules (VFR) pilot workloads. The proposal suggests the changes would increase safety in the proposed Transit Lane areas and improve the ATS service provision overall. However, one major airline operator expressed their view that the proposal would introduce very significant changes that traded controlled separation for flexibility of VFR operations in a complex environment; refer Annex D submission 2. This submission noted Queenstown is one of

the most complex airfields in the southern hemisphere and their view was the proposal was seeking to introduce an environment that had strikingly similarities to the location of the recent Potomac River accident; the NTSB having issued urgent safety recommendations to the FAA, emphasizing the need to deconflict airplane and helicopter traffic in the vicinity of Washington DCA.

**Airspace and Runway Capacity**

27. The proposal does not examine coordinated scheduling of domestic and international departures and arrivals, nor is there any significant analysis of the airspace and/or runway capacity. Whilst a slot control system would potentially distribute air traffic demand throughout the day making ATC more manageable, it would also likely reduce the capacity for VFR arrivals and departures during peak periods.

28. On 16 May 2025 Airways NZ also provided CAA a copy of their Thematic Safety Review for Queenstown operations dated 21 June 2024. The Thematic Safety Review findings did not include any recommendations for airspace changes; the Queenstown ATS staff indicated Class C was the correct airspace classification whilst expressing a view that there was a lack of tools to manage the traffic levels and that a review of operations was needed. The review discussed in further detail the challenges of ATS provision with several findings and recommendation made, including procedures to manage frequency congestion, managing VFR route complexity and helicopter operations.

**Decision Timeframes**

29. Aviation Chart amendments are determined by the Aeronautical Information Management (AIM) production cycle. VNC amendments by the AIM system are produced once per calendar year on the 10 of November. This is an AIP system limitation to meet Aeropath's chart production requirements. The cutoff date for amendments to be included in the yearly VNC amendment cycle is the 24th of April for CAA and the 8th May for Aeropath.

30. Based on the timeline of the Queenstown Airspace petition communicated by Airways, they were advised in the weeks leading up to the 24th of April 2025 the petition's success was unlikely based on the production constraints and the CAA

decision making timeline. Both Aeropath and CAA were asked for relaxation of the VNC amendment submission dates for the 2025 calendar year.

31. The timeline of submissions on the Queenstown Airspace Petition was as follows:

1. Version 1 of the petition application submitted on the 5th of May 2025, 7 days after the CAA VNC cut-off date.
2. A workshop between CAA Aeronautical Services and Airways NZ was conducted on the 23rd of May 2025. The initial petition safety argument itself was deemed not to meet Airways Exposition requirements.
3. Subsequent feedback was provided to Airways and ultimately Version 2 of the Airways NZ Queenstown Airspace Petition Vol 1, Vol 2 and Safety Statement was submitted to CAA on the 29th of May 2025.
4. CAA Aeronautical Services published these documents on the CAA website as part of its independent consultation obligations per CAR 71.9 on the 9 June 2025.

32. In practical terms, for CAA to meet the normal production milestones a decision on the petition would need to have been delivered within 3 days of receiving the initial incomplete version. This was unachievable and required Aeropath to extend its production time limits. Aeropath advised the petition could not be supported by VNC chart amendment.

33. Due to no fault of their own, Aeropath were unable to meet both Airways NZ's time constraints for chart amendment, and the CAA's requirements to establish a defendable regulatory decision on the change. Whether the petition is approved or not, the 2025 VNC amendment will not incorporate the proposed changes.

34. Not having the 2025 VNC amended will have safety impacts on the operational implementation of the petition itself. In practical terms, the airspace changes could only be depicted in AIP Supplemental publications and NOTAMs. This is a further consideration in any regulatory decision making.

35. The time taken by CAA to assess the final version of the petition is currently 25 working days. 15 of these working days was taken up by CAA conducting its own consultation. CAR Part 71 requires petitions to be submitted 90 days prior to the airspace change being active. Acknowledging for permanent airspace requiring VNC annotation, this is 90 days prior to VNC amendment cut-off – which is a date fixed by Aeropath's production requirements.

36. Whilst the ISCIA rating was a factor in the airspace petition being submitted in the timeframe it was, Airways also acknowledged a gap in their understanding of the AIM production milestones the application constraints this places on the associated regulatory decisions. An additional complicating factor was a lack of meaningful

coordination with the Aeropath AIM team in the early stages of the petition development. This would likely have avoided unnecessary time pressure.

**Rationale for Airspace Change**

37. The Queenstown CTR is Class C Airspace. A CTR/CTA Class C airspace designation requires IFR traffic to be provided a separation service. It also requires VFR aircraft to be separated from IFR traffic, VFR traffic to be provided information about other VFR flights AND, importantly, for traffic avoidance advice to be provided to VFR flights when it is requested. By reducing the size of the controlled airspace and increasing the size of the transit lanes within the CTR, the petition reduces the level of air traffic services to VFR aircraft operating to and from Queenstown.

38. In other words, the petition transfers the risk of collision and the responsibility for collision avoidance from ATC to the VFR Pilot when VFR aircraft operate within the new transit lanes. An additional consequence is an increased safety risk due to VFR aircraft inadvertently stray outside a Transit Lane and coming into conflict with IFR aircraft. This risk is exacerbated by each Transit Lane being allocated its own communications frequency.

39. In addition to the safety considerations with additional radio frequencies, there are additional technical considerations required if the petition progresses. This includes coordination and agreement with relevant regulatory authority and other airspace users prior to any allocation of specific frequencies. This is not discussed in any detail in the petition.

40. Whilst frequency congestion is an acknowledged issue in the airspace, there are various contributing factors. The petition does not examine in any significant detail:

- The location of transmitters and potentially the number of transmitters to provide adequate coverage through the area.
- The operational settings for the control service (division of responsibility/frequency allocation between controllers) and the number of operational positions/controllers in the tower during peak hours.
- The potential for aircraft to be operating on multiple frequencies in proximity to each other, in complex airspace is likely to reduce situational awareness and lead to delay in communication between operators and ATC in the event of unplanned events occurring when controller action is required to resolve any specific situation.

**Incident Data**

41. The Aeronautical Services Team undertook an initial review of incident and occurrence data at Queenstown, reviewing available data from 2019 to 2024. The data for the 2022 to 2024 period indicated across these years: an ongoing issue around rotary breaches of clearance, between 43 to 57 occurrences of jet missed approach or go arounds from approach, between 27 and 47 unstable approaches, jet windshear events between 9 and 18 occasions, propellor aircraft breach of clearance between 10 and 24 occasions. These data points evidence current understandings of the

operational challenges for both operators and ATS alike at the location. The trade-off will be between safety and efficiency/economy based on the current proposal.

42. Notwithstanding the nature of mixed VFR and IFR operations at Queenstown, in the broadest sense the petition did not discuss whether current ATC staffing levels were fit for purpose or could contribute to any of the issues provided as rationale for change. Equally there was no discussion of what potential technical infrastructure changes could be made at the location, to facilitate the provision of the ATS service level required by the airspace Class C designation and traffic density. The airspace change proposal indicates that Queenstown Aerodrome Control may not currently be able to meet all of the Class C requirements, all the time. Without any specific or detailed examination of the capability of the Air Traffic Management "system" at Queenstown within the petition, it would be difficult to rule it out as a potential causal factor in the challenges of the current service provision.

## CAA Decision

43. In reviewing the Queenstown Airspace Petition submitted by Airways NZ, the following conclusions are noted:

- The key design principle driving the rationale for change is redefining existing transit lane boundaries to reduce the amount of VFR aircraft being provided an ATC service on the congested control frequency.

- Therefore, the risk of collision within the transit lanes may potentially increase given VFR traffic volume is high, and there is no longer an ATC being provided. The collision risk is transferred from ATC to VFR Pilot and the CAA should the petition be approved.

- The perceived benefit is a reduction in ATC responsibility and therefore workload due to the effective reduction in controlled airspace. This is commensurate with increased VFR aircraft flexibility given they are now effectively operating in more uncontrolled airspace. These benefits are primarily achieved through a reduction in aircraft radio transmissions.

- The petition is effectively decreasing the number of aircraft being provided Air Traffic Control within the Queenstown Control Region. This is at odds with the rationale for the 2016 decision to change to Class C airspace, and is to a degree a reversion back to Class G airspace for portions of the CTR. The main area of concern is the level of hastes being imposed on a change of this magnitude in an airspace of this complexity.

- The petition also requires an interpretation of Transit Lanes which is not legally tested and may be inappropriate. Transit Lanes are stipulated as Class G airspace when active, however, the petition requires/suggests they be

Transponder mandatory. An amendment of CAR 71.57 would be required to avoid confusion.

- The petition will not be supported by Chart Changes and can only be supported by AIP SUPP. This will inject additional confusion and complexity to the change implementation.

- The net result of the airspace changes is a potential increase in collision between VFR aircraft in the transit lanes.

- The net result of the airspace changes is also a potential increase in the collision risk between IFR aircraft and any VFR aircraft inadvertently straying outside of a Transit Lane.

- The petition requires the introduction of new Radio Frequencies and complex Frequency management between Transit Lanes and CTR.

44. Queenstown presents significant safety and consequentially reputational risks. Any change to this environment needs to be carefully considered, consulted and analysed. The CAA review of this airspace petition deems the proposed changes to not give adequate consideration of the factors identified in the conclusion of this document sufficient to proceed within the existing publication constraints. Notwithstanding, more time/analysis and consultation may have delivered a more acceptable solution, the opportunity for such collaboration is a future consideration.

45. From a system wide perspective, the proposed changes to the Queenstown Aerodrome CTR, Transit Lanes and GAA's does not sufficiently balance the proposed benefits with any potential or perceived negative consequences. The risk previously identified by the CAA to require management via an air traffic service is now effectively being managed as uncontrolled airspace.

46. The shift in risk ownership will likely reduce frequency congestion and reduce ATC workload. However, the petition does not examine in any specific detail the real or potential negative outcomes of the airspace changes. Whilst the local VFR community might be comfortable with additional risk, in approving these changes, the largely unexamined risk will be transferred to the CAA.

47. The shortfalls of the petition may be linked to the ISCIA assessment of Minor Safety Impact, which in our view has failed to adequately consider the increase in safety risk caused by a change in as complex an environment as Queenstown. If the ISCIA had adequately considered a broader range of risk ownership responsibilities, and potential options, it would likely have constructed a more detailed safety argument and engaged with the CAA and Aeropath much earlier in its development.

48. The joint petition is declined.

**Civil Aviation Authority of New Zealand**
*Te Mana Rererangi Tūmatanui o Aotearoa*
**Aviation Safety Oversight Group | Aeronautical Services**
* Level 15, Asteron Centre, 55 Featherston Street, PO Box 3555, Wellington, 6011 New Zealand


Appendix A – Airways Corporation of New Zealand Limited – Queenstown Airspace Petition Volume One, Version 2.0, dated 29 May 2025.
Appendix B - Indicative current and proposed Transit Lane areas in the Queenstown CTR
Appendix C - CAA Consultation Distribution List
Appendix D - CAA Consultation Summary of Submissions

## Appendix A –

## Queenstown Airspace CTR Change Proposal

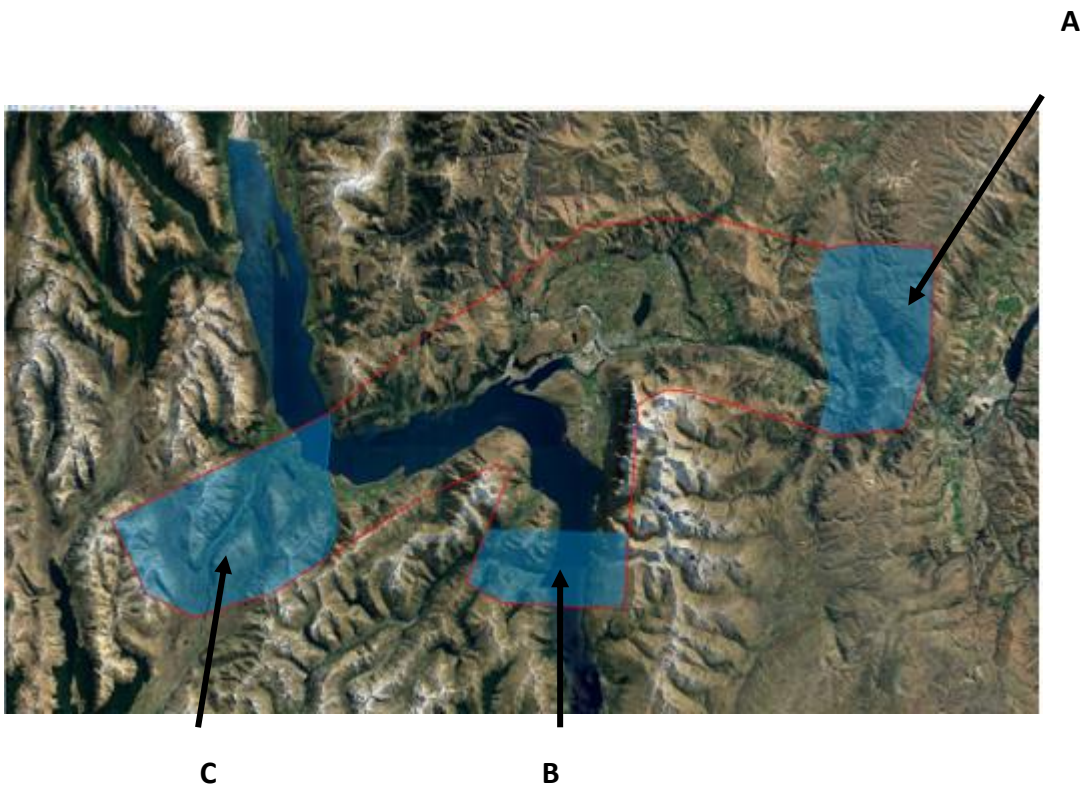
Queenstown Airspace Petition Volume One, version 2.0, dated 29 May 2025 (see consultation documents published previously, under *2025 airspace reviews, Proposed changes* heading

2025 airspace reviews | aviation.govt.nz)

## Appendix B

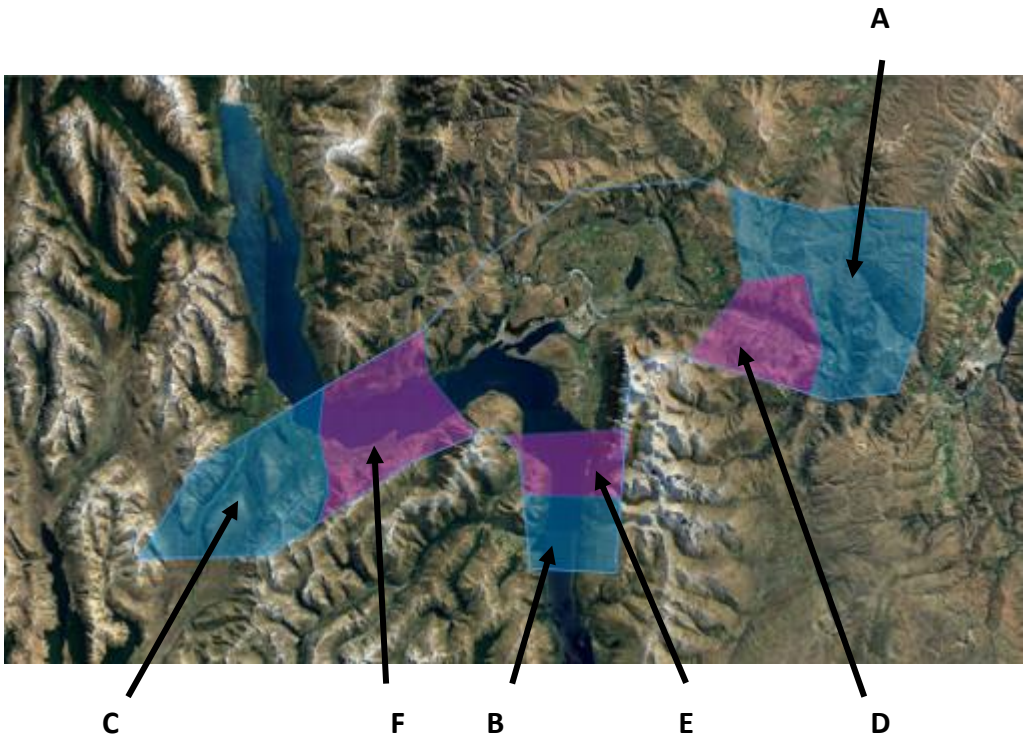
## Indicative current and proposed Transit Lane areas in the Queenstown CTR

**Current:** Transit Lanes = approximately 36.8% of CTR lateral area.



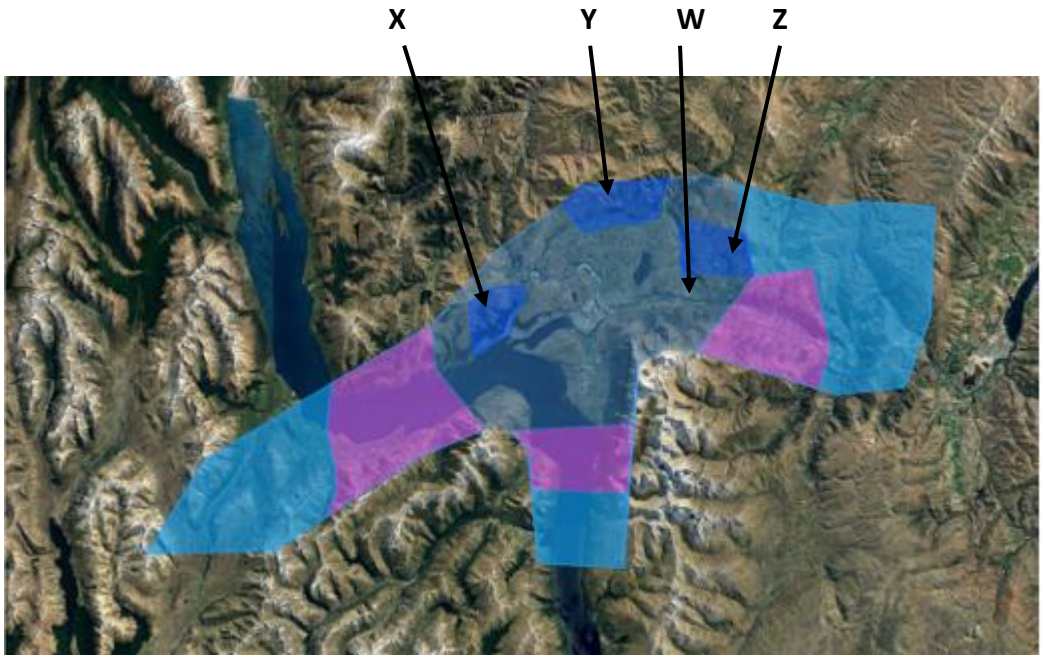

| | | |
|---|---|---|
| NZA756 | QN CTR/C | 346.0 sq NM |
| NZT750 **A** | Kawarau Transit Lane | 43.3 sq NM |
| NZT751 **B** | Kingston Transit Lane | 24.1 sq NM |
| NZT753 **C** | Ridge Peak Transit Lane | 60.0 sq NM |

**Proposed:** Transit Lanes = approximately 59.7% of CTR lateral area.




| | | | |
|---|---|---|---|
| NZA756 | | QN CTR/C | 306.0 sq NM |
| NZT750 | **A** | Kawarau Transit Lane | 56.1 sq NM |
| NZT751 | **B** | Kingston Transit Lane | 15.0 sq NM |
| NZT753 | **C** | Ridge Peak Transit Lane | 40.0 sq NM |
| NZTxxx | **D** | Proposed Gibbston Transit Lane | 22.7 sq NM |
| NZTxxx | **E** | Proposed Remarkables Transit Lane | 15.0 sq NM |
| NZTxxx | **F** | Proposed Walter Peak Transit Lane | 34.0 sq NM |

**Proposed:** Transit Lanes and GAA = approximately 66.5% of CTR lateral area




| | | | |
|---|---|---|---|
| NZA756 | | QN CTR/C | 306.0 sq NM |
| NZT750 | | Kawarau Transit Lane | 56.1 sq NM |
| NZT751 | | Kingston Transit Lane | 15.0 sq NM |
| NZT753 | | Ridge Peak Transit Lane | 40.0 sq NM |
| NZTxxx | | Proposed Gibbston Transit Lane | 22.7 sq NM |
| NZTxxx | | Proposed Remarkables Transit Lane | 15.0 sq NM |
| NZTxxx | | Proposed Walter Peak Transit Lane | 34.0 sq NM |
| NZG752 | **Z** | Crown Terrace | 6.8 sq NM |
| NZG755 | **Y** | Coronet Peak | 8.5 sq NM |
| NZG756 | **X** | Skyline | 5.3 sq NM |
| NZG758 | **W** | Arrow Junction | 0.2 sq NM |

# Appendix C

## CAA Consultation Distribution List.

**Operators, Organisations and User Groups**

Aeropath
Aircraft Owners and Pilots Association
Aircraft Owners and Pilot Association of New Zealand
Canterbury Airspace User Group
Canterbury Gliding Club
Flying New Zealand
Gliding New Zealand
Model Flying New Zealand
Mid-Canterbury Aero Club
New Zealand Aviation Federation
New Zealand Airline Pilots Association
New Zealand Agricultural Aviation Association
New Zealand Helicopter Association
New Zealand Hang Gliding and Paragliding Association
New Zealand Defence Force
New Zealand Army
New Zealand Parachute Federation
New Zealand Parachute Industry Association
Recreational Aircraft Association of New Zealand
Sports Aircraft Association of New Zealand
Sports Aviation Corps
Queenstown Milford User Group
UAV New Zealand
Air New Zealand
Jetstar
Qantas
Virgin Australia
GE Flight Efficiency Services, LLC

**Aerodrome Operators**

Milford Sound
Glenorchy
Cromwell
Cromwell Racecourse
Wanaka
Alexandra
Roxburgh
Te Anau / Manapouri
Queenstown

Electronic notification of the consultation sent to subscribers to the CAA email Notification Service for Airspace Notifications Areas NZ7, NZ8, NZ9 and NZ10.

# Appendix D

# CAA Consultation Summary of Submissions

| Submitter | Submission Text / Key Points |
|---|---|
| **1.**<br>**Airways New Zealand**<br>**Head of ATS Support** | *Needless to say, I am writing to express Airways' support for the joint petition submission by Airways, QMUG, and QAC regarding the proposed amendments to the Queenstown Control Zone.*<br><br>***Support for Joint Petition Submission***<br><br>*We fully endorse the joint petition submitted by Airways, QMUG, and QAC. The collaborative effort by these organisations reflects a comprehensive understanding of the operational environment and the unique challenges faced at Queenstown.*<br><br>***Acknowledgment of Proposed Solutions***<br><br>*Our view on a way forward is that Airways and Aeropath work together to show alternative solutions are acceptable to CAA with VNC chart updates missing for Queenstown:*<br><br>• ***Queenstown's Unique Environment****: The risk of itinerant traffic not knowing about changes is perhaps not as great as other locations, meaning the effect of non-VNC published changes might be significantly less. The proposal was developed by users, which also assists with this mitigation.*<br><br>• ***Alternative Solutions****: Aeropath can still publish other products, including AIP SUP, non-AIRAC VNC publication etc., and in the interests of addressing the safety concerns raised by QN users, the joint submitters QAC/QMUG/Airways as well as Aeropath are keen to engage and workshop these with CAA. This means no increased risk on non-VFR users.*<br><br>*We appreciate the opportunity to provide feedback on this matter and look forward to the continued collaboration to ensure the safe and efficient operation of Queenstown's airspace.*<br><br>**CAA Comment:**<br><br>CAA acknowledges the collaborative effort by Airways, QMUG and QAC whilst noting that this proposal reduces ATS service provision across a significant lateral area of the CTR during daylight hours and transferring the risks to airspace users. Acknowledging also the Airways NZ, QMUG and QAC staff have their individual understandings and perspectives of the operational environment, however, the broader CAA Rule Part 71 requirements need to be addressed.<br><br>CAA communicated to the Airways NZ submitter on receipt of this proposal that the timeline to process an application to meet the VNC publication cutoff, for the 27 November 2025 publication, would be challenging. Previous changes to airspace settings at this location necessarily involved long lead in times, ensuring all changes are |

| | |
|---|---|
| | appropriately assessed, including procedure changes, AIP changes, any training requirements, and stakeholder preparation/education.<br><br>CAA is unable to support non-AIRAC publication arrangements to introduce significant changes in the Queenstown location. |
| **2.**<br>**Airline Operator 1**<br><br>**(airline operates into Queenstown)** | The operator acknowledged Airways NZ had consulted with them.<br><br>*…. whilst there is an issue, we will need to manage regarding the increased exposure to managing a transit lane in the event of an engine failure on take-off we agree that the overall safety benefit is a worthwhile achievement.*<br><br>*…. supports this change however we propose that to provide increased assurance of safe outcomes for Air Transport Operations post the change that:*<br><br>1. *The transit lanes are made Transponder Mandatory*<br><br>2. *ATC take responsibility in the event of an emergency for broadcasting on the required frequency that there is an aircraft with an engine failure tracking toward the transit lane. Which allows crew having made the emergency call to focus on flying the aircraft and navigating within the terrain confines without then trying to communicate with VFR aircraft on a different frequency.*<br><br>**CAA Comment:** Rule Part 71.57 (d) notes Transit Lanes are Class G airspace and may only be active during daylight hours. Civil Aviation Rule Part 71 Subpart E covers the designation of Transponder Mandatory (TM) airspace. TM within class G is not currently supported by Part 71. Further, Airways NZ do not provide services in Class G airspace, the intention of this application in any case is seeking to reduce ATS responsibilities and transferring them to airspace users (uncontrolled aircraft operating VFR in the Transit Lanes). |
| **3.**<br>**Airline Operator 2**<br><br>**(airline operates into Queenstown)** | *I am glad we have been asked for feedback with regard to the amendments to ZQN Control zones as I believe this proposition introduces some very significant changes that trade controlled separation for flexibility of helicopter operations in a complex environment. While I am sympathetic to the local operators who seek to take advantage of the proposed VFR corridors, I am also acutely aware that this comes at a time when the preliminary report of the 2025 Potomac River mid-air has been released. As well as issuing a NOTAM on 19 FEB 2025 restricting helicopter traffic operating over the Potomac River near DCA from surface to 17,999' AMSL, and in the initial findings, the NTSB issued urgent safety recommendations to the FAA, emphasizing the need to deconflict airplane and helicopter traffic in the vicinity of DCA.*<br><br>*I raise this point because this proposal seeks to introduce an environment that has striking similarities to the recent Potomac River accident, at one of the most, if not the most, complex airfields/airspace in the southern hemisphere.*<br><br>*Major areas of concern are:*<br><br>• *VFR traffic will be on a separate frequency (119.1) to IFR traffic, removing one of the tools we have to create a mental model for situational awareness.*<br><br>• *In an emergency, with reduced airplane performance, the IFR traffic will likely transit the VFR area, again, with VFR traffic on a separate frequency.* |

| | |
|---|---|
| | • *The 500' vertical separation between the upper limit of the VFR zone and the approach path of IFR traffic can reasonably be assumed that with a high rate of climb, the helicopter may cause a TCAS RA.*<br><br>• *VFR traffic operating in the VFR zones, in relatively close proximity to IFR traffic are not required to have a Transponder, and therefore, TCAS will be ineffective at providing a protection against collision.*<br><br>• *The valleys around ZQN mean that there is a limited amount of space for the VFR traffic to horizontally separate, and therefore they will have to revert to vertical separation, forcing one higher (towards the upper limit, and one lower (towards terrain).*<br><br>*It was mentioned at the ZQN Users briefing (online meeting) that the growing amount of air traffic is getting harder for ATC to manage, and by introducing these VFR corridors that ATC will be more able to focus on IFR traffic. In reality the proposal would result in the transfer of the responsibility for traffic separation from ATC to the VFR users, with procedures and standards that can reasonably be expected to 'vary widely'. Again, this is in a complex environment that can have unforgiving consequences.*<br><br>*The discussions for this proposal have largely been with regard to local helicopter operators, but don't forget that these VFR corridors will also attract GA/private operators from around the country who will be keen to 'check out the changes' and take advantage of the new VFR zones around ZQN. While local operators may maintain a high standard and understanding of 'the way things work' amongst themselves, this will not be the case for every other GA/private operator.*<br><br>*I personally had a TCAS RA near the bungy bridge when a VFR aircraft strayed into the area without a clearance, and due to the terrain, the tower was unable to see the traffic, and was unaware it was there. Luckily, they had a transponder, and it was turned on, so we got a 'climb RA' and avoided collision. If the proposal to open up VFR zones goes ahead, I expect that similar situations will occur more often and may not have the same outcome as I was lucky enough to experience.*<br><br>*I am all for the fair use of airspace for all users, where it is appropriate, but ZQN is not that place to not have ATC control of that traffic, even if it results in delays for arriving and departing IFR traffic to facilitate separation standards.*<br><br>**CAA Comment:** CAA agrees with the comment that the Airways NZ proposal in effect transfers responsibility for traffic separation from ATC to the VFR operators; noting, the intention of the Queenstown airspace classification change, to Class C airspace, in 2016 sought to enhance the safety level of control service provision and associated separation standards. While there may be efficiency gains, the current proposal increases the risk for commercial jets operating into Queenstown. |
| **4.**<br>**Queenstown Airport Company** | *We were pleased to have been actively involved in the development of this proposal, alongside Airways and the Queenstown Milford User Group, who represent the general aviation operators. We have been encouraged, and have appreciated the collaborative process, open engagement and constructive dialogue through interest-based problem solving.*<br><br>*Queenstown Airport is committed to the safe and sustainable growth of aviation at the airport to support continued economic growth in the region. In our view, the proposed change represents a positive and pragmatic step toward reducing operational* |

| | |
|---|---|
| | *complexity and supporting improved system-wide safety outcomes. The proposal also supports Airways in streamlining its services and will enhance system efficiency and resilience, and better position Airways to meet the evolving needs of a growing and dynamic region.*<br><br>*We are strongly supportive of both the intent and direction of the proposal, and we remain committed to ongoing engagement as the initiative progresses.*<br><br>**CAA Comment:** CAA disagrees the proposal reduces operational complexity or improves system wide safety outcomes. Rather the proposed airspace change would result in an increase in complexity with an associated reduction in the level of ATS provision, in airspace the Director previously determined Class C separation requirements were needed. Acknowledging resilience and efficiency for Airways NZ services is a consideration, ultimately the safety of all airspace users is the primary concern, hence the rationale for the previously designated Class C airspace. |
| **5.**<br>**Organisation** | *NZ Army South Island using agency have reviewed this submission and responded no concerns as to the proposal.*<br><br>**CAA Comment:** Noted |
| **6.**<br>**Organisation** | *I think we missed the ZQN deadline but have no issues with it.*<br><br>**CAA Comment:** Noted |