
Proposed Special Use Airspace Tāwhaki National Aerospace Centre

**Summary of Submissions Received, and Airspace
Designation Decision.**

Table of Contents

Introduction	2
Tāwhaki Special use Airspace Proposal.....	2
Consultation	6
Submissions.....	7
CAA Consideration and Comments on Submissions	7
CAA Decision	8
Appendix A – Tāwhaki Special Use Airspace Proposal	
Version - A, dated 20 Feb 2025.....	9
Appendix B – CAA Consultation Distribution List	10
Appendix C – CAA Consultation Summary of Submissions.....	12
Appendix D - Designated Restricted and Danger Areas,	
effective 7 August 2025.....	15

Introduction

On 20 February 2025, the Head of Aerospace at Tāwhaki National Aerospace Centre (TNAC) submitted an application requesting the designation of permanent Special Use Airspace (SUA) areas. TNAC is located at Kaitorete Spit, approximately 20 nautical miles (NM) south of Christchurch International Airport on the east coast of the South Island, immediately to the south of Lake Ellesmere. The TNAC site, which includes a 1 km sealed runway, was established to support emerging technology research and development activities, enabling trials and testing for leading-edge advanced aviation and aerospace endeavours. The SUA application request comprised of six Restricted Areas and six Dangers Areas to be activated by NOTAM as required for emerging technology flight test activities at the location.

Tāwhaki Special Use Airspace Proposal

Civil Aviation Rule (CAR) Part 71 provides the regulatory context to designate Restricted Areas and Danger Areas, as special use airspace. Specifically, 71.151 prescribes the criteria that the Director must consider in designating special use airspace below:

71.151 General

(a) The Director may designate special use airspace under this Subpart if the Director considers such airspace is necessary—

- (1) in the interests of safety or security within the civil aviation system; or*
- (2) in the interests of national security; or*
- (3) for any other reason in the public interest.*

(b) The Director must ensure that each portion of airspace designated under this Subpart is as small as practicable consistent with the activities for which the area is required.

CAR Part 71, 71.153 prescribes the criteria for designating restricted areas, describing the Director and administering agency responsibilities:

71.153 Restricted areas

(a) The Director may—

(1) designate a portion of airspace as a restricted area to restrict the activities of aircraft within that area —

- (i) within the territorial limits of New Zealand; and*
- (ii) within the territorial limits of another ICAO Contracting State in the Auckland Oceanic Flight Information Region upon request by that State; and*

(2) impose conditions under which—

- (i) aircraft may be permitted to fly within that restricted area; and*
- (ii) the administering authority responsible for the restricted area must operate.*

(b) The Director must—

- (1) specify the type of activity for which each restricted area is designated; and*
- (2) specify the administering authority responsible for each restricted area; and*
- (3) identify each area by the ICAO nationality letters of the applicable State followed by the letter “R” followed by a number.*

- (c) The administering authority responsible for a restricted area—*
- (1) must manage—*
 - (i) the entry of aircraft into the restricted area; and*
 - (ii) the operation of aircraft within the restricted area; and*
 - (iii) the exit of aircraft from the restricted area; and*
 - (2) if the restricted area is designated as being made active by NOTAM, must at least 24 hours before the restricted area is to become active, give to the New Zealand NOTAM Office notice of that restricted area becoming active, except that in the case of emergencies less than 24 hours notice may be given; and*
 - (3) may, within any conditions imposed by the Director under paragraph (a)(2)(ii), impose conditions under which an aircraft may be operated within the restricted area.*

Further, CAR 71.161 prescribes the criteria for designating danger areas, describing the Director and using agency responsibilities:

71.161 Danger areas

- (a) The Director may designate a portion of airspace as a danger area to notify operators that there is a potential danger to aircraft flying in the area.*
- (b) The Director must—*
 - (1) specify the nature of the danger for which each danger area is designated; and*
 - (2) if the Director considers it necessary, nominate a using agency as the contact point for a danger area; and*
 - (3) identify the area by the ICAO nationality letters of the applicable State followed by the letter “D” followed by a number.*
- (c) The using agency for a danger area must—*
 - (1) be a person or organisation that is responsible for the activity that necessitated the danger area being so designated; and*
 - (2) ensure that the activities that necessitated the designation of the danger area are contained within that danger area; and*
 - (3) if the danger area is designated as being made active by NOTAM, at least 24 hours before the danger area is to become active, give to the New Zealand NOTAM Office notice of that danger area becoming active, except that in the case of emergencies less than 24 hours notice may be given.*

The Proposal at Appendix A sought to publish no single Using Agency for the proposed Danger Areas (DA), see Proposal page 21.

CAA Comment. It is the CAA view that given the location of the proposed DA airspace and the variable activity that may take place within these areas, a Using Agency should be promulgated for these areas. CAA envisaged TNAC might act as Using Agency, meeting the CAR Part 71.161 (c) requirements through the development of agreements with operators; for example, TNAC staff required to confirm, for each activation of an area that an operator’s CAA Certification and Operational Specification information permits the intended activity and the activity may be contained within the volume of the SUA areas selected to activate.

The full Tāwhaki Special Use Airspace Proposal is available at Appendix A.

To summarise, the proposal requested:

- Six Restricted Areas (RA) - five RA to be active from surface to 6000ft AMSL, one RA to be active surface to 3500ft AMSL
- Six Danger Areas (DA) – three DA to be active from surface to UNL, and 3 DAs to be active from 6000ft to UNL.
 - The 3 DA active from 6000ft to UNL are laterally coincident with 5 of the proposed RAs; and
 - The 3 DA active from surface to UNL included one small DA to the north and 2 DA to the southeast extending seaward from the 12NM Territorial Sea limit

Indicative areas as depicted in the airspace proposal (Appendix A, pages 9 & 10) are reproduced below:

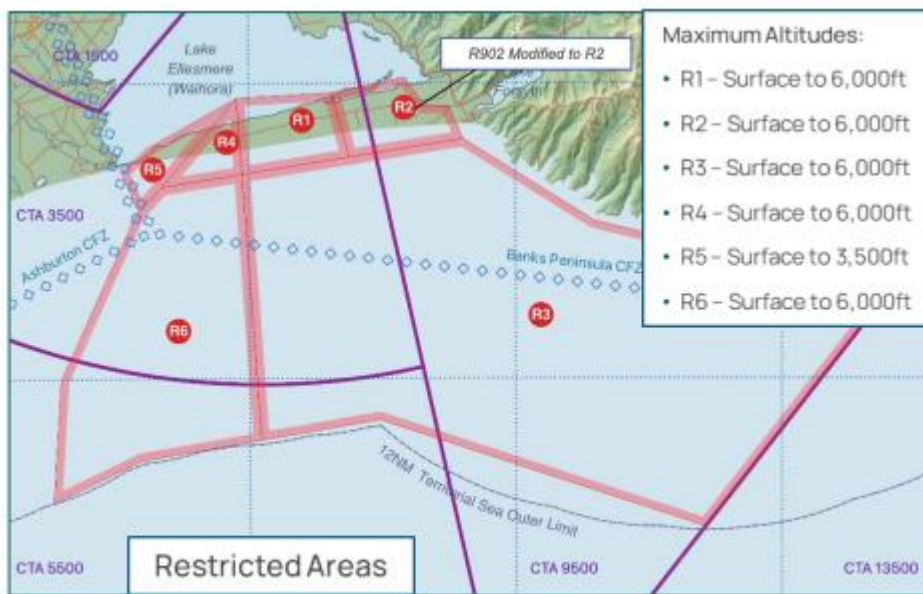


Figure 1 – Proposed Restricted Areas

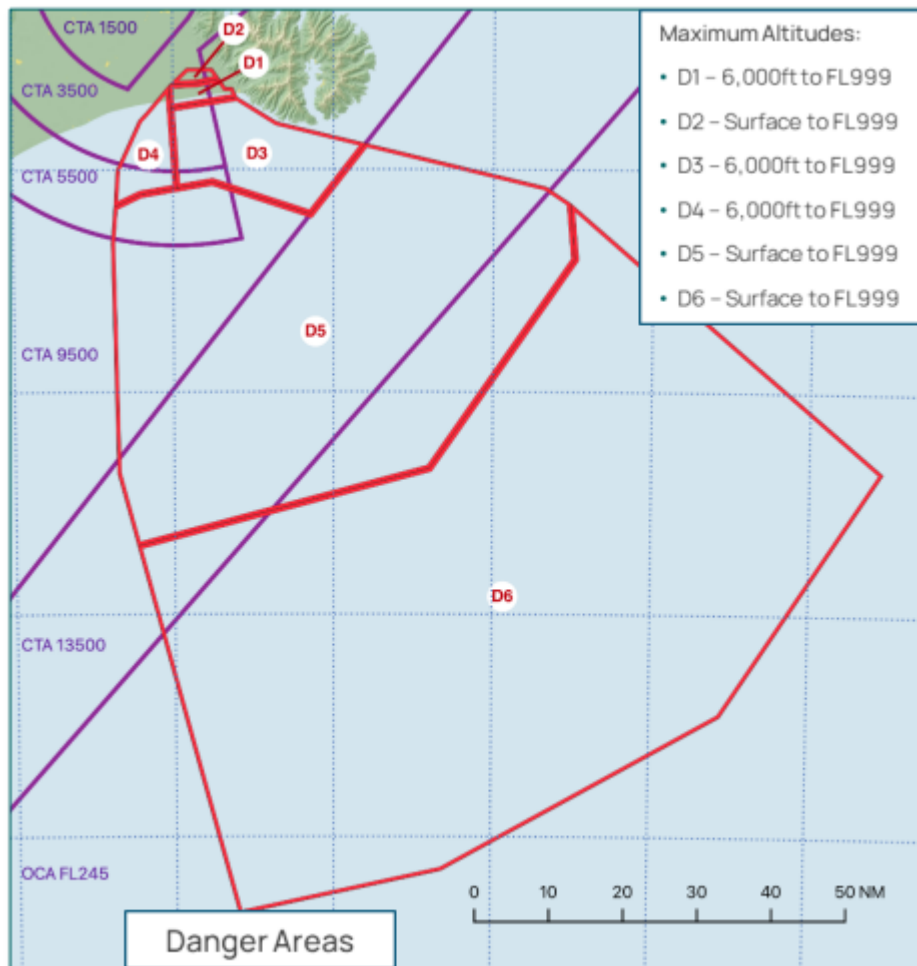


Figure 2 – Proposed Danger Areas

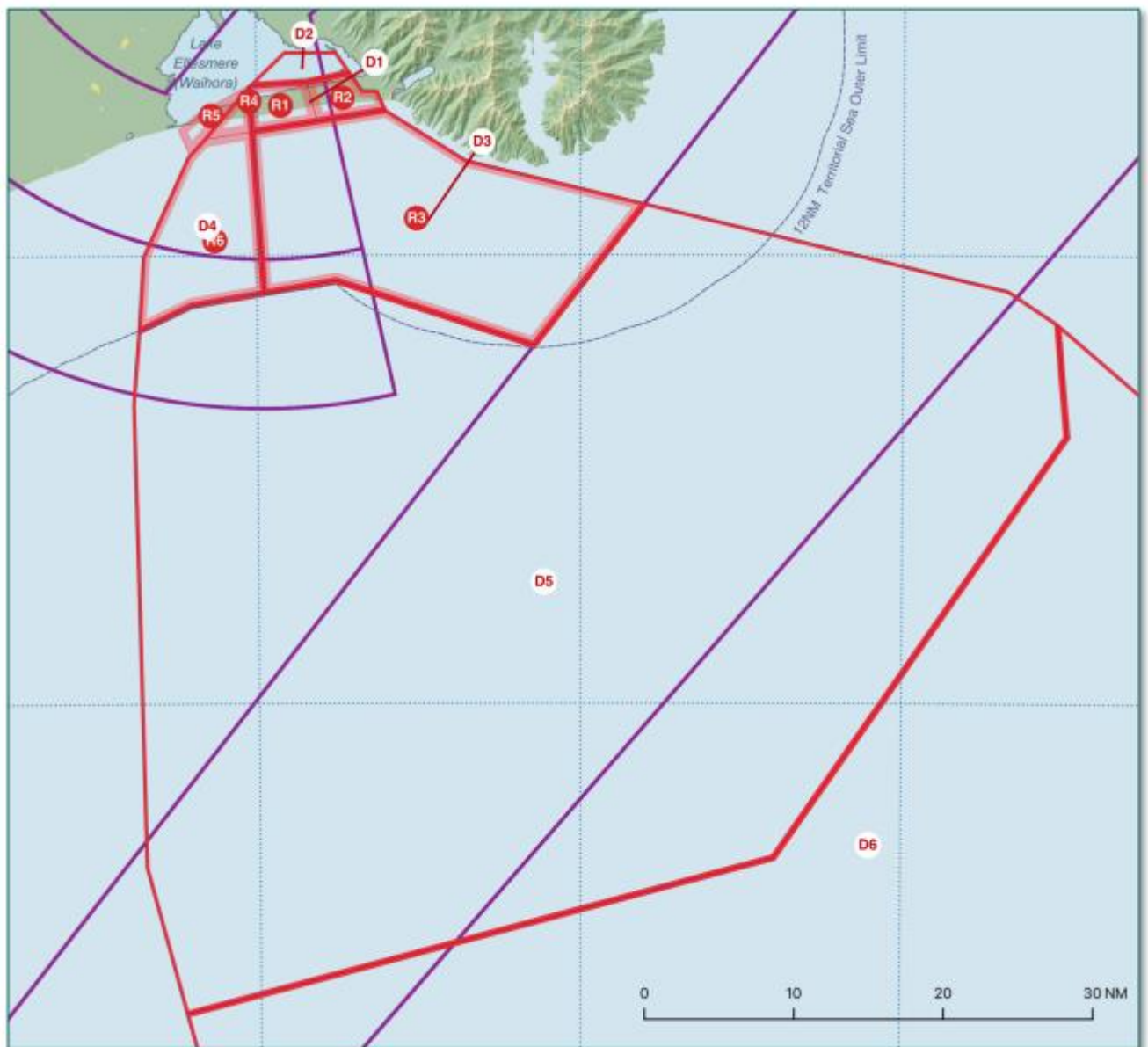


Figure 3 – Proposed Special Use Airspace (RA and DA) Nearest Shore

Consultation

Prior to submitting this application TNAC staff conducted extensive stakeholder engagement including with Airways NZ, Christchurch International Airport, identified air transport operators, general aviation operators, recreational aviation operators and other representative aviation organisations; refer pages 27-30 of Appendix A for a summary of all stakeholder responses to the TNAC consultation. TNAC further advised that during earlier temporary SUA consultation stakeholders had recommended or indicated a strong preference for a single set of areas to be established and managed by TNAC, for all operators from the site, rather than multiple SUA allocated for individual operators. The TNAC proposal for permanently promulgated SUA will provide this capability.

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.

The CAA consultation document notifying the TNAC proposal was sent directly to the organisations listed at Appendix B (Consultation Distribution List) for consideration and comment and was also published on the CAA website from 18 March 2025 to 18 April 2025 at the following link:

[2025 airspace reviews | aviation.govt.nz](https://aviation.govt.nz/2025-airspace-reviews)

Notifications were also sent to CAA email notification subscribers to Airspace Notifications – Briefing Areas 7, 8 and 9.

Submissions

There were 6 submissions received, these are recorded in Appendix B.

CAA considerations and comments on submissions

CAA wishes to thank submitters for their consideration and feedback provided regarding the proposed SUA areas at the Kaitorete site.

The submissions largely supported the SUA proposal and provided some comments and suggestions for how the SUA areas can be most efficiently managed in consideration of other users of the airspace areas.

A submission by Canterbury Airspace User Group (CAUG) included meeting minutes from the March 2025 meeting. The minutes covered discussions regarding the Tāwhaki airspace application. During the meeting the Helicopter Emergency Medical Service (HEMS) staff expressed concern around emergency procedures for HEMS flights requiring to transit through active restricted areas. Tāwhaki staff assured the HEMS staff and CAUG members that they would work with HEMS staff to develop and test procedures for these circumstances, ensuring clear communication and coordination with operators during emergencies. The meeting also discussed options for using assigned frequencies when the special use airspace areas is active.

TNAC has applied for an aeronautical band frequency for the TNAC site and its activities. TNAC are also working towards agreeing a series of Memoranda of Understandings (MoUs) with aviation stakeholders, to agree the action required by parties to ensure safety is always maintained. TNAC have previously provided to CAA a draft Airspace Coordination Plan (ACP) describing the processes Tāwhaki staff will follow, and the specific staff responsibilities when these areas are to be activated. A condition for this airspace designation for Restricted Areas and Danger Areas requires the final ACP to be provided to CAA for review no later than 18 July 2025; this timeframe acknowledges the ongoing work by Tāwhaki staff to continue their stakeholder coordination. Stakeholder coordination includes finalising the agreements within stakeholders MoUs, including with Airways New Zealand, University of Canterbury Wireless Research Centre, CAUG, CIAL, HEMS and others as applicable.

A senior advisor from the CAA Emerging Technology Programme is continuing to provide support to Tāwhaki staff, providing advice for operational planning and radio communications when the SUA areas are in use.

Notification of the activation of these special use airspace areas will be via NOTAM at least 24 hours in advance, as required by CAR Part 71, 71.153 (C)(2) and 71.161 (C) (3); all pilots are required by Civil Aviation Rule Part 91.217, and 91.221 to be familiar with all information concerning their flights, including briefing the NOTAMs relevant to the flight path being flown.

Tāwhaki Aerospace Centre has a Civil Aviation Rule Part 157 Determination, see at link: [157 Tawhaki Joint Venture](#) . This Determination includes several operating conditions specific to the location, one condition requiring the TNAC to report annual movement number in accordance with Civil Aviation Rule Part 139.505 .

CAA Decision

Acknowledging the New Zealand Governments intention to accelerate the growth of the aerospace sector through their partnership with Project Tāwhaki and in consideration of responses from CAA consultation, contents of submissions received, six restricted areas and six danger areas are designated effective 7th August 2025; see Appendix D for depiction of areas.

The Administering Authority (for the six Restricted Areas) and the Using Agency (for the six Danger Areas) is Head of Aerospace, Tāwhaki National Aerospace Centre, Tel 0800 824252, email airspace@tawhaki.co.nz .

The NZR902 Kaitorete Spit is withdrawn effective 7th August 2025.

The Tāwhaki SUA areas will be reviewed after 5 years or prior to that time should any concerns or feedback necessitate an earlier review.

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

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Appendix A - Tāwhaki Special Use Airspace, Version A, dated 20 February 2025.

Appendix B - CAA Consultation Distribution List

Appendix C - CAA Consultation Summary of Submissions

Appendix D - Designated Restricted and Danger Areas, effective 7 August 2025.

Appendix A –

Tāwhaki Special Use Airspace Proposal

Enabling development flight operations at the Tāwhaki National Aerospace Centre.

Version – A dated 20 February 2025

(Due to its size this appendix is attached as an accompanying document)

Appendix B

CAA Consultation Distribution List.

Aerodrome operators (charted aerodromes only):

- Ashburton Aerodrome
- Ashburton Medical Centre Heliport
- Christchurch International Airport
- Christchurch Hospital Heliport
- Fernside Fields Aerodrome
- Forest Fields Aerodrome
- Loburn Abbey
- Pudding Hill Aerodrome
- Rangiora Aerodrome
- Rakitata Island Aerodrome
- Springfield Aerodrome
- Timaru Aerodrome
- West Melton Aerodrome

Operators, Organisations and User Groups

- Airways New Zealand
- Aeropath
- Air New Zealand
- Aircraft Owners and Pilots Association
- Aircraft Owners and Pilot association of New Zealand
- CAA, Aviation Safety Advisor – South Island
- Canterbury Airspace User Group
- Canterbury Gliding Club
- Christchurch Helicopters
- Flying New Zealand
- Gliding New Zealand
- Model Flying New Zealand
- Mid-Canterbury Aero Club
- New Zealand Airline Academy
- New Zealand Aviation Academy
- 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
- South Canterbury Aero Club
- UAV New Zealand
- Jetstar
- Qantas
- Virgin Australia
- University of Canterbury (NZR902 Administering Authority)

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

Appendix C

CAA Consultation Summary of Submissions

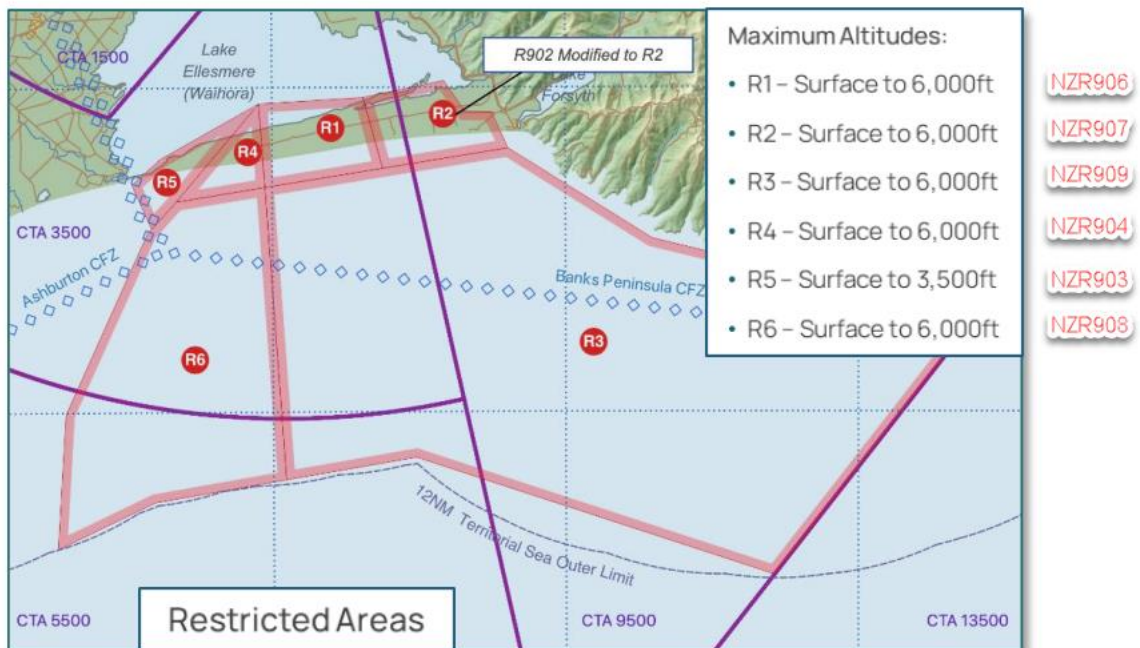
Name of Submitter	Key Points in the submission
Airways New Zealand	<p><i>Airways has been in consultation with the Tawhaki National Aerospace Centre, with regards to this application for SUA.</i></p> <p><i>In general, Airways believes that the proposal is reasonably well balanced. Following our discussions, they have made some changes to the dimensions of the SUA to increase the separation, against the LADIS routes.</i></p> <p><i>We also discussed the issue as to how the SUA will be activated, and we have reached agreement upon the process.</i></p>
New Zealand Aviation Federation (NZAF)	<p><i>The consultation list is substantial.</i></p> <p><i>Just in case someone has been missed I have forwarded the documents to all Aviation Federation members.</i></p> <p>CAA Note: No further submission was received from NZAF members.</p>
Flying New Zealand	<p><i>The Flying NZ team and the FNZ instructor council have no issues with this application thanks.</i></p>
Aviation Industry Association	<p><i>UAVNZ supports the proposal to establish permanent Special Use Airspace (SUA) at the Tāwhaki National Aerospace Centre. The proposal represents a well-considered and practical solution to meet the needs of a growing advanced aviation and aerospace sector, while maintaining appropriate access and safety for other airspace users.</i></p> <p><i>The approach taken by Tāwhaki demonstrates strong alignment with best practice airspace management. The design of the SUA, using flexible, modular Restricted Areas (RA) and Danger Areas (DA), activated only when required balances operational needs with minimal impact on existing traffic. The proposed structure supports innovation while preserving the usability of surrounding airspace for general aviation and other stakeholders.</i></p> <p><i>Tāwhaki's proactive engagement with the airspace community, including Airways New Zealand, the CAA, and a broad range of aviation stakeholders, is commendable. The inclusion of clear procedures for SUA activation, communications, and coordination with other users reflects a mature and safety-focused approach.</i></p> <p><i>We also support the proposed administrative structure, including Tāwhaki's role as the Administering Authority and the inclusion of airspace coordination processes through NOTAM and VHF communications. These measures will ensure both situational awareness and equitable access are maintained.</i></p> <p><i>UAVNZ considers this proposal to be a strong example of how Special Use Airspace can be structured to support sector growth while safeguarding broader aviation system integrity.</i></p>
Christchurch International Airport Limited.	<p><i>Christchurch International Airport Limited (CIAL) is supportive of the emerging technology activities of the Tāwhaki National Aerospace Centre (TNAC)</i></p> <p>Feedback comments noted:</p> <ul style="list-style-type: none"> <i>several instrument flight tracks arriving and departing Christchurch Airport have been identified as impacted including New Zealand overflights.</i> <i>southern flights between Christchurch and Antarctica are also affected. TNAC should consider aircraft operator schedules prior to activating the Danger Areas.</i> <i>impact to flights is added track miles through re-routing of flight paths.</i>

	<ul style="list-style-type: none"> • CIAL Support the proposed restricted and danger areas being activated by NOTAM with a minimum 36 hours' notice, and the airspace being available to other airspace users outside of the activation windows. • International long-haul overflights that use NZCH as an alternate aerodrome. The operator requires a minimum of two hours prior to departure notice to update the flight plan. The additional time considers delays in processing requests by the NOTAM Office due resourcing and workloads. • We understand that TNAC has Memorandums of Understanding with Airways and Canterbury Aeroclub in how the airspace is to be operated and managed which were put in place for the temporary Special Use Airspace activations. A MOU should be developed between TNAC and CIAL that documents policy in activating the special use airspace to minimise disruptions to existing and future flight routes through the proposed restricted and danger area airspace. • That any airspace designation change is reviewed after five years; a cost benefit analysis is performed and consultation with stakeholders is undertaken to assess the impact of the activated airspace before making any permanent changes to the airspace designation. • Restricted Areas R1 through R6 <ul style="list-style-type: none"> ◦ We are supportive and have no technical objection of these areas being utilised as described. • Danger Areas D1 through D5 <ul style="list-style-type: none"> ◦ We are supportive of the principle of re-routing flight paths outlined in the proposal. However, we note that these areas impact several existing instrument flight paths which require re-routing when the nominated airspace danger area is active. ◦ The re-routing adds track miles and consequential operational inefficiencies, as aircraft operators prefer to fly direct routes. While the rerouting does not have a significant impact on individual flights to and from Antarctica, it imposes a cumulative penalty on flight planning over the season, requiring additional fuel to be carried. • TNAC has proposed a radio communication plan with a continuous 'ATIS'-style recording advising of the airspace status when inactive. Once the airspace is active, the advisory would be replaced with a radio operator on an allocated VHF channel. We would prefer the use of two frequencies—one with a continuous status message and the other monitored by a radio operator during airspace activation. This is also preferred by Canterbury Airspace Users Group • Comment and background on the Lincoln University's Agribusiness & Economics Research Unit authored a report, <i>The Contribution of Antarctic-related Activities to the Canterbury and New Zealand Economy</i>. • Christchurch Airport provides a gateway for missions to and from Antarctica. <ul style="list-style-type: none"> ◦ The cumulative effect of additional track miles in flight planning requires additional fuel to be carried which increases operational costs. Although individual flights can tolerate rerouting, a permanent increase in flight path distance creates an overall increase in operational aggregate costs—especially when alternative gateways such as Hobart could become more viable to operators' supporting bases on the Antarctic continent. <p>CIAL proposed Mitigations</p> <ul style="list-style-type: none"> • While we support the proposed 24-hour NOTAM procedure, we request that TNAC consider the National Antarctic Programme flight schedule and aim to activate airspace outside of those flight schedules where possible. The support programme is seasonal, running from September to March with an average of 30 flights per month subject to weather conditions. • TNAC, with support from Airways, proposed that when a danger area is active and the aerial vehicle is operating above 60,000 feet², other aircraft may be cleared to transit the area. However, as these are unmanned flights—when the airspace is active, UAV presence is not monitored and a risk approach by operators of manned flights would be to avoid the airspace when it is activated. <p>CIAL suggests Further work</p> <ul style="list-style-type: none"> • While this proposal has innovation benefits and other airspace users may manage their operations around the activated zones, we recommend a review of
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	<i>the airspace usage be undertaken after five years to evaluate the effectiveness and success of the Special Use Airspace.</i>
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Appendix D

Designated Restricted and Danger Areas, effective 7 August 2025.



NZR906

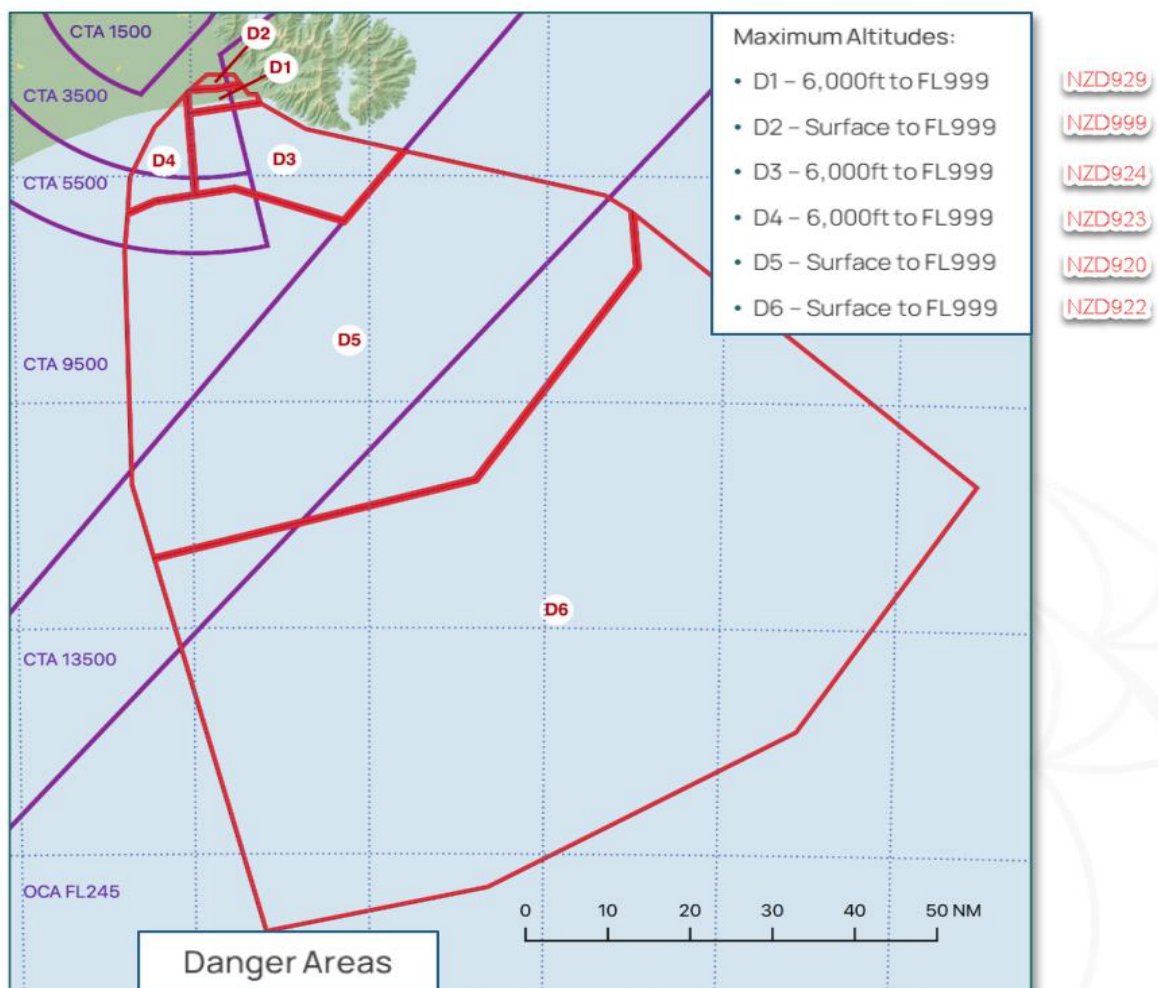
NZR907

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NZD929

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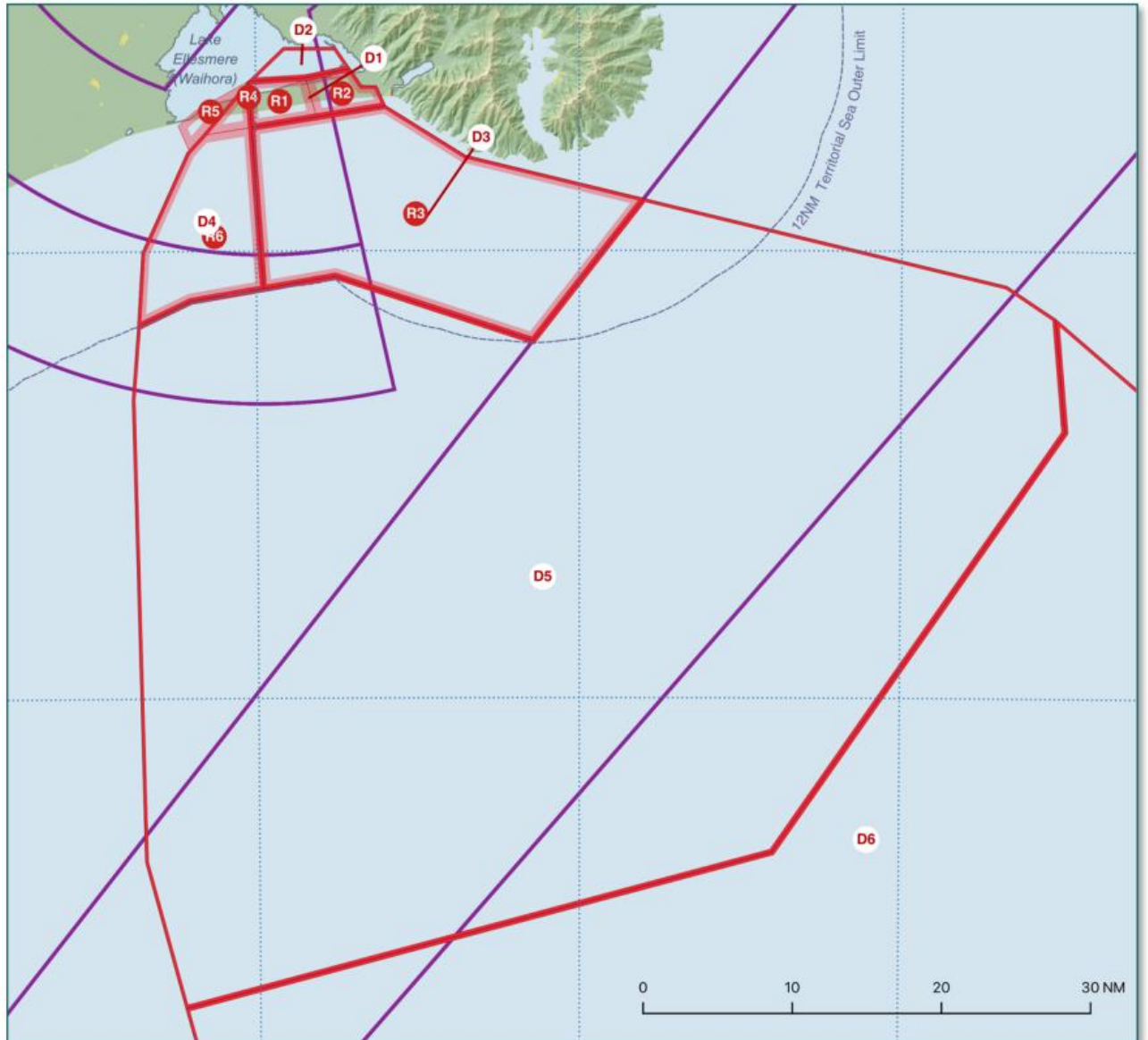


Figure 3 – Proposed Special Use Airspace (RA and DA) Nearest Shore

For complete designation information refer to the Aeronautical Information Publication (AIP) information; see AIP Supplement 25/8 when published on the AIP web site [Home | AIP New Zealand](#)