
Proposed Ashburton Common Frequency Zone

Summary of Submissions Received, and Final AIP Changes

Table of Contents

Introduction	1
Proposed Common Frequency Zone	1
Consultation	1
<i>Submissions</i>.....	2
CAA Decision	4
Further information.....	5
Appendix A – Proposed Ashburton CFZ	6
Appendix B – Final Ashburton CFZ and Banks Peninsula CFZ.....	6
Appendix C – Consultation Distribution List.	9
Appendix D – Summary of Key Points from Submissions.....	10
Name of Submitter	10
Key Points.....	10

Introduction

In mid 2020, Ashburton Airport Authority applied for a Common Frequency Zone (CFZ) around Ashburton aerodrome (NZAS). A CFZ is a non-mandatory airspace and advisory in nature, i.e. an airspace area not designated under Part 71, used in New Zealand only and described in AIPNZ ENR 5.3, Section 5.

CFZs are established to encourage pilots to use a single VHF frequency allocated for the zone. Pilots should transmit position, altitude and intentions relevant to prominent reporting points or features at entry, and at other times for traffic safety.

This request has been made to CAA to facilitate local and itinerant traffic operating within uncontrolled airspace. The reasons stated in support of the application are:

1. Concern for local and transiting aircraft within the area being on any number of available frequencies to make position reports. The establishment of Common Frequency Zone (CFZ) attempt to rationalise these frequencies to avoid confusion for operators and remove 119.1 MHz as the frequency for Ashburton Aerodrome.
2. Alignment with current and proposed Common Frequency Zones and Mandatory Broadcast Zones along the coast to the north and south of the proposed Ashburton CFZ.

Proposed Common Frequency Zone

Refer to Appendix A for a diagram of the proposed CFZ publication.

An upper limit of 3500 ft for the CFZ has been proposed. The lower limit of controlled airspace for the extents of the area are between 1500 ft and 9500 ft, and of note the surrounding existing CFZs have upper limits of between 5500 ft and the lower limit of controlled airspace.

The north-eastern boundary of the Ashburton CFZ is aligned with the Banks Peninsula CFZ.

The south boundary of the Ashburton CFZ is proposed to align with the South Canterbury CFZ and Timaru North MBZ.

Consultation

Civil Aviation Rule Part 71.9 requires the Director to consult with affected persons, organisations, and representative groups within the aviation industry before making a designation or classification of airspace. Whilst CFZ's are not designated airspace under CAA Rule Part 71 the proposal information was issued for public consultation inviting feedback from users and other interested parties.

The consultation document describing the proposals 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 at the following link:

[2022 airspace reviews | aviation.govt.nz](https://www.aviation.govt.nz/2022-air-space-reviews)

Notifications were also sent to CAA email notification subscribers to Airspace Notifications – Briefing Areas 5,6,7.

Submissions

There were 5 submissions received and these are recorded in Appendix C.

2 submissions supported the proposal or provided no position, 2 submissions suggested alternative airspace, and 1 submission was opposed to the proposal.

CAA feedback on submissions

CAA wishes to thank submitters for the proposed Ashburton CFZ.

Submissions opposed to the proposal

One submitter opposed the CFZ suggesting it may detract from the ‘see and avoid’ mentality, and introduce unnecessary RT complexity and clutter.

The submitter also provided comments originally provided to CAA in 2013 whilst considering nationwide CFZ at the time.

CAA comment:

CAA agree that aircraft operating VFR in class G airspace should primarily be looking out for other traffic, rather than relying solely on VHF transmissions to inform situational awareness. However, in this case the merit of consolidating a separate frequency around an aerodrome, where 119.1MHz is used currently, is beneficial over the current situation where there is no discrete frequency for local operations, and the current 119.1MHz frequency is complex.

The CAA position provided as a result of consultation in 2013, and remains current, is that CFZ proposals be considered on a case-by-case basis where the merits of consolidating a non-mandatory VHF frequency are justified. To inform a decision for this petition the CAA has considered the role of adjacent airspace frequencies in promulgating CFZ, the potential for added complexity within the surrounding airspace and, additionally, the feedback from previous CFZ applications in which the wider use of CFZ has been considered by the submitters. In this case, it appears that the CFZ proposal is justified according to the 2013 and current CAA position.

Submissions proposing amendments to proposal

Two submitters supported the proposed CFZ with amendments to boundaries.

One submitter suggested that the western boundary proceed from Hinds via the Hinds River to Lismore, and not out to Arundel as proposed.

CAA comment:

There was no justification provided by the submitter for this amendment, however CAA disagree with this amendment proposal. The proposed boundaries align with the South Canterbury CFZ boundaries providing continuous visibility of common frequencies in the area. The amendment proposed would create a 'gap' between CFZs that would add unnecessary complexity and ambiguity on frequencies.

Another submission provided a graphical representation depicting the proposed amendment, suggesting that the airspace boundary between the proposed CFZ, and the Banks Peninsula CFZ be offshore.

CAA comment:

Common Frequency Zones are by nature general areas of common frequency rather than zones with set 'boundaries' of frequency use. Saying that, in this case providing a boundary amendment offshore is consistent with other MBZ/CFZ in the South Canterbury region to facilitate clear frequency usage for aircraft tracking via the coast.

CAA is also aware of the recent Tāwhaki aerodrome development in this area, so it may be advantageous to clarify the frequencies in use offshore.

In this case the CAA accept this minor boundary amendment to the proposed Ashburton CFZ and Banks Peninsula CFZ, however CAA will simplify the boundaries to avoid complexity.

Aerodrome discrete frequency

The proponent for the proposed CFZ indicated that the CFZ would 'remove 119.1 MHz as the frequency for Ashburton aerodrome'. This factor was considered in whether a discrete aerodrome frequency alone would enable the aerodrome to achieve its safety objectives.

AIP New Zealand ENR 6.2.2 notes '*Pilots of all aircraft operating outside controlled airspace below 3000 ft AGL within a radius of 10 NM of an unattended aerodrome should maintain a continuous listening watch on the frequency listed in the COM box on the aerodrome chart, or on 119.1 MHz if there is no such chart*'.

In the case of operations in the vicinity of Ashburton aerodrome pilots should currently only switch to 119.1 MHz within 10 NM of the aerodrome; pilots should not routinely be broadcasting on 119.1 MHz outside that distance. It is noted that a variety of aerodromes on the east coast of the South Island also utilise 119.1MHz.

Further, AIP New Zealand GEN 3.3.16 Air-to-Air Communications notes '*The aircraft to aircraft chat frequency within the New Zealand FIR is 128.95 MHz. In uncontrolled airspace, if not within an MBZ/CFZ, operate on the appropriate FISCOM frequency*'.

It is accepted that the proposed Ashburton CFZ if implemented would formalise consolidated frequencies over a geographic area outside of 10NM from Ashburton aerodrome, however Ashburton aerodrome should consider implementing a discrete aerodrome frequency in coordination with users if appropriate prior to any CFZ implementation.

Further, the proposed upper limit of the Ashburton CFZ was 3,500 ft, which would provide little benefit in the case of a future aerodrome discrete frequency being in use to 3,000 ft, and does not align with other CFZ/MBZ in the area. Of note, to the immediate south the South Canterbury CFZ extends to 5,500 ft upper limit, therefore aligning this provides a seamless frequency transition for aircraft at these altitudes. The CAA view is to amend the upper limit to 5,500 ft or lower limit of controlled airspace, whichever is lower.

CAA Decision

On the basis of CAA consultation and for the rationale explained above the Ashburton CFZ may proceed, with the amendments described. The final airspace is depicted below in Appendix B. The Common Frequency Zone will be promulgated in AIPNZ/VNC on AIRAC 24/12 effective 28 November 2024.

A frequency must be assessed and licenced with Radio Spectrum Management and is to be done in conjunction with the publication of the Common Frequency Zone on Visual Navigation Charts. An Ashburton CFZ frequency has now been assessed by Radio Spectrum Management and 119.4 MHz will be assigned.

Operators and aerodromes within the Ashburton CFZ wishing to utilise this frequency must update any discrete aerodrome frequency as required for AIRAC 24/12.

The proponent may also wish to consider applying for an aerodrome specific frequency in the interim prior to publication of the CFZ on Visual Navigation Chart.

This document is also available on the CAA website at the following link:

<https://www.aviation.govt.nz/airspace-and-aerodromes/airspace/airspace-review/2022-airspace-reviews/>

Further information

For further information contact:

Hamish McKoy
Senior Technical Specialist – Aeronautical Services
Civil Aviation Authority of New Zealand
P O Box 3555
Wellington 6140

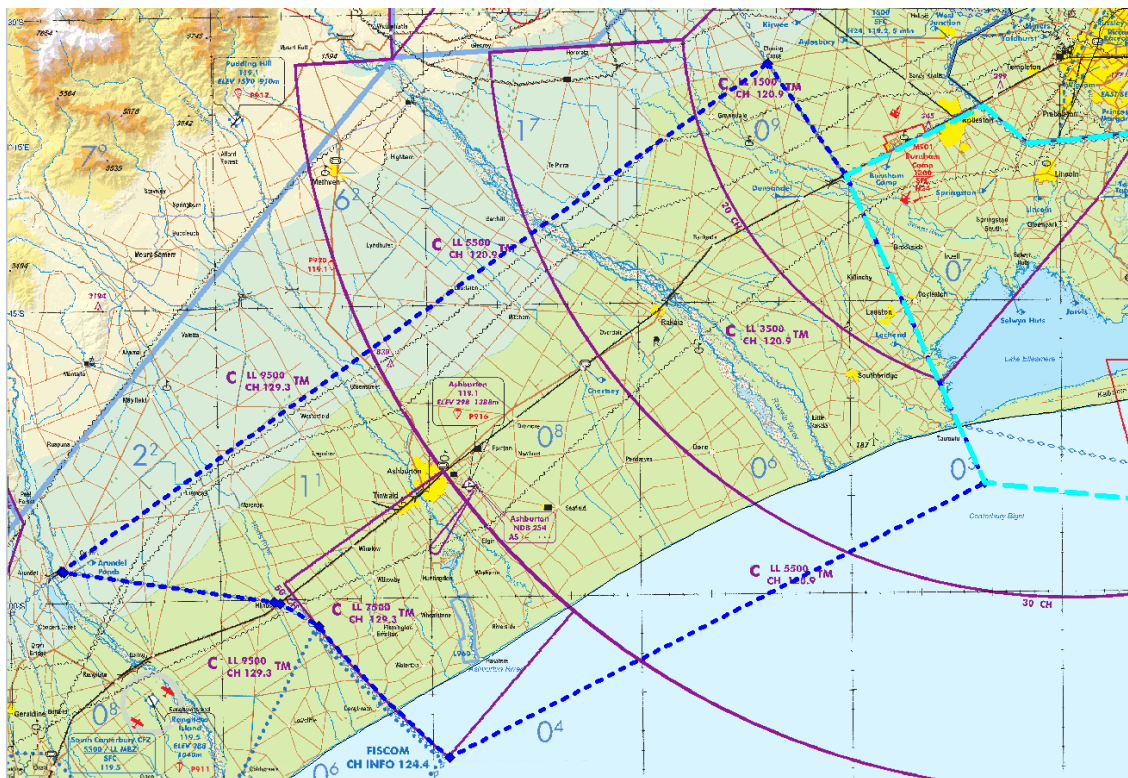
Phone: (DDI) 04 830 0520

Email: Hamish.McKoy@caa.govt.nz or aeronautical.services@caa.govt.nz

Appendix A – Proposed Ashburton CFZ



Appendix B – Final Ashburton CFZ and Banks Peninsula CFZ



ANR Data

NZC 976 Ashburton CFZ

All that airspace bounded by a line joining

S 43 54 17.19, E 172 24 27.32;
S 44 08 09.20, E 171 46 06.60; the arc of a circle of 50 NM centred on
S 43 30 14.76, E 172 30 52.69; (CH VOR/DME) from
S 44 08 09.20, E 171 46 06.60; to
S 44 01 16.80, E 171 36 52.90; a line joining
S 44 01 16.80, E 171 36 52.90;
S 44 00 06.20, E 171 34 07.60;
S 44 00 01.35, E 171 33 42.38;
S 43 58 16.64, E 171 18 47.34;
S 43 58 14.80, E 171 18 42.40;
S 43 58 14.70, E 171 18 36.00;
S 43 32 37.20, E 172 09 20.50;
S 43 38 26.50, E 172 14 47.10;

Upper limit: Lower limit of controlled airspace or 5500 ft, whichever is lower (1,500 ft, 2, 500 ft and 3,500 ft AMSL as applicable).

Lower limit: Surface.

Active: Permanently active.

Frequency: 119.4 MHz "Ashburton traffic".

Effective from 2411271100

NZC 977 Banks Peninsula CFZ, Canterbury

All that airspace bounded by a line joining

S 43 39 00.0, E 173 11 00.0;
S 43 51 00.0, E 173 10 00.0;
S 43 57 00.0, E 172 57 00.0;
S 43 51 21.4, E 172 22 37.9; (Lake Ellesmere outlet)
S 43 38 26.5, E 172 14 47.1; (intersection of Godley, Main South and Norwood Roads)
S 43 38 26.5, E 172 14 47.1 a line following SH 1 from
S 43 38 26.5, E 172 14 47.1 to
S 43 35 27.0, E 172 22 44.4; (intersection of SH1 and Springston Road)
S 43 35 27.0, E 172 22 44.4 a line following Springston Road from
S 43 35 27.0, E 172 22 44.4 to
S 43 37 20.5, E 172 24 18.0; (intersection of Springston and Rolleston Roads)
S 43 37 20.5, E 172 24 18.0 a line following Rolleston Road from
S 43 37 20.5, E 172 24 18.0 to
S 43 38 10.0, E 172 26 58.4; (Lincoln)
S 43 38 30.0, E 172 28 13.4 a line joining
S 43 38 30.0, E 172 28 13.4
S 43 33 54.1, E 172 37 30.5 (Cashmere High School);

S 43 33 42.1, E 172 45 00.5 (Southshore Peninsula);
S 43 35 23.7, E 172 48 49.7;
S 43 39 00.0, E 173 11 00.0.

Upper limit: Lower limit of controlled airspace.
Lower limit: Surface.
Active: Permanently active.
Frequency: 118.75 MHz, 'Banks traffic'.

Effective until 2411271100.

NZC 977 Banks Peninsula CFZ, Canterbury

All that airspace bounded by a line joining

S 43 39 00.0, E 173 11 00.0;

S 43 51 00.0, E 173 10 00.0;

S 43 57 00.0, E 172 57 00.0;

~~S 43 51 21.4, E 172 22 37.9; (Lake Ellesmere outlet)~~

S 43 54 17.19, E 172 24 27.32;

S 43 38 26.5, E 172 14 47.1; (intersection of Godley, Main South and Norwood Roads)

S 43 38 26.5, E 172 14 47.1 a line following SH 1 from

S 43 38 26.5, E 172 14 47.1 to

S 43 35 27.0, E 172 22 44.4; (intersection of SH1 and Springston Road)

S 43 35 27.0, E 172 22 44.4 a line following Springston Road from

S 43 35 27.0, E 172 22 44.4 to

S 43 37 20.5, E 172 24 18.0; (intersection of Springston and Rolleston Roads)

S 43 37 20.5, E 172 24 18.0 a line following Rolleston Road from

S 43 37 20.5, E 172 24 18.0 to

S 43 38 10.0, E 172 26 58.4; (Lincoln)

S 43 38 30.0, E 172 28 13.4 a line joining

S 43 38 30.0, E 172 28 13.4

S 43 33 54.1, E 172 37 30.5 (Cashmere High School);

S 43 33 42.1, E 172 45 00.5 (Southshore Peninsula);

S 43 35 23.7, E 172 48 49.7;

S 43 39 00.0, E 173 11 00.0.

Upper limit: Lower limit of controlled airspace.
Lower limit: Surface.
Active: Permanently active.
Frequency: 118.75 MHz, 'Banks traffic'.

Effective from 2411271100.

Appendix C – Consultation Distribution List.

Aerodrome operators (charted aerodromes only):

- Ashburton aerodrome
- Christchurch aerodrome
- Fernside fields aerodrome
- Forest Field aerodrome
- Loburn Abbey aerodrome
- Pudding Hill aerodrome
- Rangitata Island aerodrome
- Rangiora aerodrome
- Springfield aerodrome
- Timaru aerodrome
- Waimate aerodrome
- West Melton aerodrome
- Wyndale aerodrome

Operators, Organisations and User Groups

- Aircraft Owners and Pilots Association
- Airways Corporation of New Zealand
- Air New Zealand
- Balloon Aviation Association
- Canterbury airspace user group
- Canterbury aeroclub
- Flying New Zealand
- Gliding New Zealand
- Mid Canterbury aeroclub
- Model Flying New Zealand
- New Zealand Airline Academy (Oamaru)
- New Zealand Aviation Federation
- New Zealand Agricultural Aviation Association
- New Zealand Helicopter Association
- New Zealand Hang Gliding and Paragliding Association
- North Otago aeroclub
- Recreational Aircraft Association of New Zealand
- Royal New Zealand Air Force
- Skydiving Kiwis
- South Canterbury aeroclub
- Sport Aircraft Association New Zealand
- Sport Aviation Corp

Appendix D – Summary of Key Points from Submissions

Name of Submitter	Key Points
Gliding New Zealand	<p><i>Gliding New Zealand opposes the proposed Ashburton CFZ.</i></p> <p><i>We remain of the opinion that the introduction of CFZ's can detract from a 'see and avoid' mentality, and introduce unnecessary RT complexity and clutter.</i></p> <p><i>Gliding New Zealand also provided comments originally provided to CAA in 2013 whilst considering nationwide CFZ at the time.</i></p>
Airways New Zealand	<p><i>Airways NZ did not have any feedback on the proposed Ashburton CFZ.</i></p>
RAANZ	<p><i>RAANZ fully supports the establishment of a CFZ in the area around Ashburton aerodrome.</i></p> <p><i>We believe it will simplify RTF procedures and thus aircraft safety.</i></p> <p><i>RAANZ suggests that the western boundary proceed from Hinds via the Hinds River to Lismore, and not out to Arundel as proposed.</i></p>
P Kyle	<p><i>I agree with the proposed Ashburton CFZ, with a minor boundary amendment.</i></p> <p>The submission provided a graphical representation depicting the proposed amendment, suggesting that the airspace boundary between the proposed CFZ, and the Banks Peninsula CFZ be offshore.</p>
Canterbury aeroclub	<p><i>We support this application</i></p>