
**Request to retain NZR100, amending vertical
dimensions
New operator - Channel Infrastructure NZ Limited
Airspace user consultation**

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Introduction

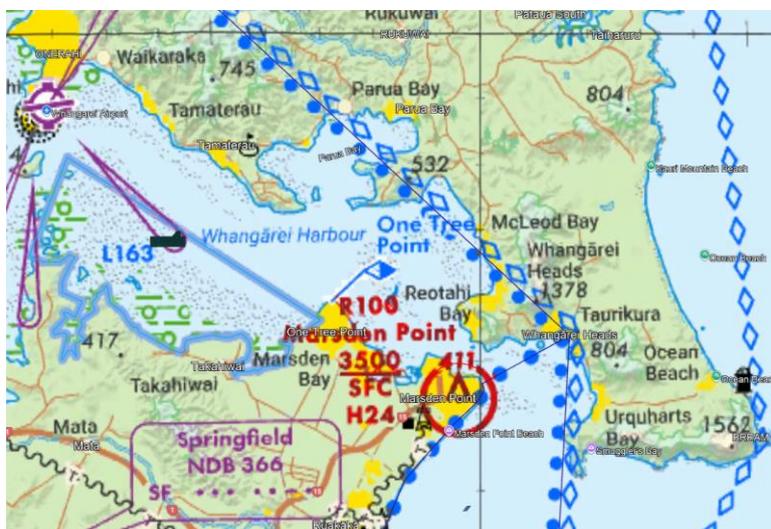
The current NZR100 airspace designation was last amended in 2003 when the currently published Administering Authority (NZ Refining Company) submitted a request to increase the vertical limit from 1000ft to 3500ft; the promulgated activity at that time was oil refining. In October 2024 a CAA review for all existing Restricted Area airspace identified that the NZ Refining Company was no longer operating at the site and the current site managers were now Channel Infrastructure NZ Limited.

In January 2025 Channel Infrastructure NZ provided an update to request the area was retained for their organisation, with themselves becoming the Administering Authority for the NZR100 area. At that time having confirmed there had been changes to the nature of activities at the site since the original NZR100 designation was made, and acknowledging refining activity was no longer taking place, CAA requested Channel Infrastructure submit an airspace application for their current activity and their requested dimensions for the area; noting the NZR100 lateral and/or vertical dimensions might no longer be justifiable for the nature of current activities at the site.

Proposed amendment

The Channel Infrastructure NZ Application requests the lateral dimensions of NZR100 remain the same and the vertical limit be reduced from the current 3500ft AMSL to 2000ft AMSL, permanently active.

Current NZR100 shown below:



The Channel Infrastructure NZ application provided the following rationale for the amended NZR100 remaining designated:

Main Activity - Critical National Fuel Facility

Marsden Point holds the largest stock of fuel in New Zealand at around 300 million litres. Marsden Point is also the main fuel storage facility for the upper North Island and Auckland in particular. Although no longer an oil refinery, Marsden Point is a critical fuel depot where most fuel is imported and held onsite then distributed mainly to Auckland.

The "critical" Refinery/Ruakaka Auckland Pipeline (RAP) also known as the Marsden Point to Auckland Pipeline supplies fuel to the Wiri Terminal in Auckland. This includes 95% of Auckland's petroleum supply including all jet fuel for Auckland Airport.

Any disruption to the Marsden Point fuel stock or supply of oil held on-site would be of "national significance" as identified by the Government. This would affect New Zealand's fuel supply including the civil aviation system, dramatically impact the general public and is of national security importance.

This criticality was identified when the RAP was ruptured in 2017. The New Zealand National Fuel Plan (section 2.4.1) denotes the Marsden Point import terminal, including two jetties, are critical points in the national fuel supply chain.

The Government has focused on protecting the fuel supply at Marsden Point and further developing the site. Regional Development Minister Shane Jones says the Government will consider creating a Special Economic Zone to support an energy precinct at the former Marsden Point oil refinery.

The current designated Restricted Airspace rationale has not changed. What has changed is the potential for unmanned aerial vehicles (UAVs) to operate over the complex and the restricted airspace is therefore required for all aircraft including UAVs. There is an unpublished helipad to the north of the complex so UAVs need to remain clear.

It is important to note that the refinery structures remain in place, necessitating the continuation of airspace restrictions to avert accidental collisions and ensure safety. As a facility classified as a major hazard, Channel Infrastructure is required by Worksafe NZ regulatory requirements to ensure the safety of operations. Ensuring that any aircraft including UAVs are not allowed to operate over the whole site where extremely large quantities of flammable fuels are stored is a key risk mitigation. The positioning of a heliport beside the Marsden Point fuel facility adds some airspace complexity and is a further aviation safety reason to restrict aircraft and UAV operations. The Marsden Point risk register includes aviation risks and the associated facility Safety Case including the aviation risk mitigation has undergone a systematic evaluation to determine its effectiveness and appropriateness from a Risk Management standpoint.

CAA Note: Rule part 71.151 Special Use Airspace notes the Director may designate special use airspace under the Rule when considered necessary:

- in the interests of safety or security within the civil aviation system; or
- in the interests of national security; or
- for any other reason in the public interest.

CAA is cognisant that Special Use Airspace is not intended to be designated solely for the purpose of protecting ground-based infrastructure; other CAA Rules assist in providing protection for these installations:

- Part 101 Unmanned Aircraft Operating Rules apply [Part 101 consolidation \(aviation.govt.nz\)](https://aviation.govt.nz) (see Reference 101.207 Airspace - Drones should not be flown above persons or property unless prior consent has been obtained).

- Civil Aviation Rule Part 91 [Part 91 - General Operating and Flight Rules - 1 December 2021 \(aviation.govt.nz\)](#) covers the general operating and flight rules for aircraft flying in New Zealand; Reference 91.311 requires aircraft not to fly VFR below 1000ft over any congested area, or below 500ft over any other areas.
- Infringements and aviation concerns can be reported / aviation concern raised:
 - Call 0508 4SAFETY (0508 472 338) during office hours. After hours, you can leave a message.
 - Email isi@caa.govt.nz

Civil Aviation Rules already restrict low flying aircraft and UAV operations over the site. Designation of restricted airspace does not provide additional assurance that non-compliant operators will not over fly the site.

Possible effect to IFR aircraft

The Channel Infrastructure application advised collaboration had taken place with the Aeropath Instrument Flight Procedure (IFP) Design staff regarding existing and planned IFPs. The application further noted:

Consultation was undertaken with Aeropath as Whangarei Airport is changing from a Non-directional beacon (NDB) ground based navigation aid to a Very High Frequency Omni directional Range Station (VOR) in 2027. There will be changes to the current instrument approached and the Marsden Point restricted area at 3,500 feet will impact the initial instrument procedure design. Although this will not occur until 2027 following consultation it has been decided to lower the restricted area to 2,000 feet.

Possible effect to VFR aircraft

The effect on VFR aircraft is anticipated to be minimal.

Consultation

Prior to designating airspace, Civil Aviation Rule 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.

The Director invites feedback in regard to the proposed airspace change.

This document will be sent directly to the organisations listed below. It would be appreciated if you would kindly forward the document to your members for consideration and comment.

Aerodrome operators (charted aerodromes only)

- Whangarei aerodrome
- Whangarei hospital heliport
- Kensington Park heliport
- Wellsford heliport
- Warkworth heliport
- Springhill aerodrome
- Omaha Flats aerodrome

- Kaipara Flats aerodrome
- Helena Bay heliport
- Bay of Islands hospital heliport
- Otehei Bay heliport
- Paihia Waterfront heliport
- Paihia heliport
- Kaikohe aerodrome
- Kerikeri /Bay of Islands aerodrome

Operators, Organisations and User Groups

- Air New Zealand
- Aircraft Owners and Pilots Association
- Airways Corporation of New Zealand
- Aviation Federation New Zealand
- Balloon Aviation Association
- Flying New Zealand
- Gliding New Zealand
- Model Flying New Zealand
- New Zealand Agricultural Aviation Association
- New Zealand Airline Pilots Association
- New Zealand Aviation Federation
- New Zealand Defence Force
- New Zealand Hang Gliding and Paragliding Association
- New Zealand Helicopter Association
- New Zealand Parachute Federation
- New Zealand Parachute Industry Association
- Recreational Aircraft Association of New Zealand
- Royal New Zealand Air Force
- Sport Aircraft Association New Zealand
- Sport Aviation Corp
- UAV New Zealand

Notification that this document has been posted online will be sent to CAA email notification subscribers to Airspace Notifications – Briefing Areas 1 and 2.

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

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

Submissions

This document forms part of the consultation process. Submissions are sought from any interested person, organisation or representative group.

Submissions are accepted either electronically or via mail.

Please address submissions to:

Team Coordinator
Aeronautical Services Unit
Aviation Safety Oversight Group
Civil Aviation Authority of New Zealand
PO Box 3555
Wellington 6140

Email: [aeronautical.services@caa.govt.nz](mailto: aeronautical.services@caa.govt.nz)

Reference **2025-00332 – Amendment to Restricted Area NZR100**

Closing date for submissions is **Wednesday 7th May 2025**

Further information

For further information contact:

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