

Before the Expert Panel

FTAA-2504-1054

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Under **Fast-track Approvals Act 2024**

In the matter of an application for approvals in relation to the Ryans Road Industrial Development

By **Carter Group Limited**  
Applicant

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**Supplementary statement of evidence of Benjamin John Hargreaves (L+R Airport Consulting)**

20 February 2026

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## 1 **Supplementary statement of Benjamin John Hargreaves (L+R Airport Consulting)**

### Introduction

- 1 My name is Benjamin John Hargreaves.
- 2 I am a practicing chartered professional civil engineer (C.P.Eng MIEAust, C.Eng MICE, M.Eng) with over 25 years of experience in airport planning and development, airport safeguarding studies and aviation impact assessments. I also hold a Master of Science postgraduate degree in Airport Planning and Management from Loughborough University in the UK. Since 2007 I have led the specialist airport and aviation consulting team of the L+R group where I have conducted, managed or directed several dozen airport safeguarding studies for developments on or near airports, or which intrude into the protected operational airspace of airports such as Sydney (Kingsford Smith), Western Sydney International, Melbourne (Tullamarine), Essendon, Moorabbin, Bankstown and various regional aerodromes. These have included several aviation/aeronautical impact assessments for developments subject to the State Significant Development approval process in NSW. I have led aviation impact assessments for new airport runway infrastructure planning approvals at Melbourne and Perth airports, acted as Technical Advisor to the Australian Government in relation to the airspace and flight path design for Western Sydney International Airport, and contributed airport safeguarding components of statutory airport master plans for Australian federal leased airports. I have considerable experience with planning and safeguarding of helicopter landing sites in several Australian state and territory jurisdictions having been involved in the incorporation of planning protections for hospital helipad flight paths in Victoria, and the subsequent assessment of development proposals referred under the planning triggers for impact on the viability of helicopter operations. My understanding of Christchurch International Airport operations includes membership of an international expert panel for the peer review of the 2023 Updated Air Noise Contours on behalf of Environment Canterbury, in which I was responsible for the review of flight tracks and airspace assumptions adopted in the modelling.
- 3 I was involved in the preparation of the **Christchurch International Airport Safeguarding Assessment** for the **Ryans Road Industrial Development**, which was submitted as part of the Applicant's response to submissions on the application (Appendix 17) (**L+R Airport Safeguarding Assessment**).

## **Code of practice for expert witnesses**

- 4 I have prepared this statement of evidence in my capacity as an expert, and I acknowledge that I have read and understand the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with it when preparing this statement of evidence. I have also complied with it when preparing the assessment described at paragraph 3 above. Other than where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

## **Purpose and scope of this supplementary evidence**

- 5 I have been asked by the Applicant to prepare this supplementary statement of evidence in response to the supplementary submission of Airways New Zealand (**Airways**) and Christchurch International Airport Limited (**CIAL**) dated 18 December 2025.

- 6 The purpose of this statement is to confirm that:

- (a) I have reviewed the supplementary comments (of:

- (i) Airways New Zealand (dated 18 December 2025);
- (ii) Christchurch International Airport Limited (dated 18 December 2025);

(together, the **Supplementary Comments**)

- (b) I have reviewed the supplementary statements of evidence prepared for the Applicant in response to the Supplementary Comments by Dr Andrew Shelley (FenixUAS), Mr Geraint Bermingham (Navigatus), Mr Simon McPherson (Cyrrus), and Ms Lizzie Civil (PDP).

- (c) Taking the supplementary statements referenced in paragraph 6(b) above into consideration, nothing raised by Airways or CIAL causes me to alter the conclusions reached in the L+R Airport Safeguarding Assessment provided as a part of the Applicant's s 55; and

- (d) I stand by the conclusions in my original assessment. In my opinion, the aviation safety effects of the proposal remain acceptable, subject to the conditions proposed by the Applicant.

- 7 This statement of evidence also addresses:

- (a) Australian National Airports Safeguarding Framework (NASF) Guidance for protecting Strategic Helicopter Landing Sites;
- (b) The conditions proposed by the Applicant; and
- (c) Sufficiency of the information and assessments provided by the Applicant; and
- (d) Potential Impacts / Costs of the Proposal.

### **NASF Guidance for Strategic Helicopter Landing Sites**

- 8 I note that GCH Aviation, in its formal aviation safety submission attached to CIAL's supplementary comments of 18 December 2025 references the Australian NASF Guideline H: Protecting Strategically Important Helicopter Landing Sites (SHLS).
- 9 I make no assertion as to the status of GCH as a SHLS or otherwise, noting that NASF Guideline H is, firstly and foremost, guidance to Australian state/territory and local government decision makers in the Australian context where HLS are not regulated under the Australian Civil Aviation Safety Regulations (CASRs) which are the equivalent of the New Zealand Civil Aviation Rules. NASF Guideline H is also explicit that identifying and declaring SHLS is each state or territory jurisdiction.
- 10 While the NASF Guideline H indicates a number of matters that should be considered in relation to the safeguarding of SHLS, its primary purpose is to guide land use planning authorities on the incorporation of planning controls to protect SHLS operations. In Australia, these planning controls are required as there is an absence of national legislation providing protection to HLS. My understanding, from reference to CAR Part 77 and the supplementary statements of Dr Andrew Shelley and Mr Geraint Bermingham, is that in New Zealand CAR Part 77 notification surfaces are applicable to the GCH HLS and serve as the trigger for referral of developments to the CAA for assessment of safety impacts through the Part 77 aeronautical study process.
- 11 Further, my understanding also from the supplementary statements of Dr Andrew Shelley and Mr Geraint Bermingham, is that if additional protection to that provided by Part 77 were required, there already exist mechanisms through the New Zealand planning legislation by which these protections (in the form of designations) could have been implemented. Therefore, my conclusion is that NASF Guideline H is neither applicable nor necessary in the context of GCH.

## Conditions

- 12 I have reviewed the revised set of consent conditions proposed by the Applicant. In my opinion, the conditions collectively and appropriately address the matters raised and addressed in the L+R Airport Safeguarding Assessment.
- 13 I have also reviewed new Conditions **21A**, **21B**, and **21C**. While these conditions are not strictly necessary in light of the conclusions reached in the L+R Airport Safeguarding Assessment and reinforced by the supplementary statements of Mr Simon McPherson, Mr Geraint Bermingham, and Dr Andrew Shelley, I consider them to represent an appropriately precautionary response to address any outstanding aviation safety matters, including those raised in the Supplementary Comments.

## Sufficiency of the information and assessments provided by the Applicant

- 14 In my opinion, the information and technical assessments provided by the Applicant are sufficient to enable a robust evaluation of the aviation safety effects of the proposal. The material supplied (including the L+R Airport Safeguarding Assessment and the additional technical reports) provides a comprehensive basis for assessing potential impacts on airport operations, protection surfaces, and air navigation procedures.
- 15 Having reviewed this information in full, I am satisfied that it supports my conclusion that the proposal will not give rise to unacceptable aviation safety effects, and that the conditions proposed by the Applicant appropriately manage any residual risks.

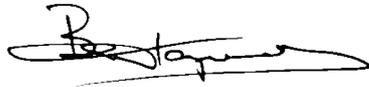
## Potential Impacts/Costs of the proposal

- 16 In preparing this statement, I confirm that I have read the *Economic Assessment of Regional Significance and Claimed Third Party Costs – Ryans Road Industrial Development* by Maggie Hong and Greg Akehurst (**Economic Assessment**), which I understand will be provided at the same time as this statement.
- 17 Overall, I agree with the views expressed in the supplementary statements of Mr Simon McPherson, Mr Geraint Bermingham, and Dr Andrew Shelley that there are no significant operational impacts on CIAL or Airways and, therefore, I would expect any potential operational constraints or costs (if any) would be relatively minor in comparison with the economic benefits of the proposal, as outlined in the Economic Assessment.

## Conclusion

- 18 Having reviewed the supplementary submissions of Airways and CIAL, as well as the additional technical material prepared by other experts, nothing has been raised that causes me to modify or reconsider the conclusions reached in the L+R Airport Safeguarding Assessment submitted with the Applicant's section 55 response.
- 19 I therefore stand by the conclusions in my original assessment. In my opinion, the aviation safety effects of the proposal remain acceptable, and any residual risks are appropriately managed through the suite of conditions proposed by the Applicant.

Dated 20 February 2026



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Benjamin John Hargreaves