

Before the Expert Panel

FTAA-2504-1054

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

Memorandum of counsel for Carter Group Limited

13 March 2026

Applicant's solicitors:

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lloyd.**

May it please the Panel:

- 1 This memorandum is filed on behalf of Carter Group Limited (**Carter Group** or **Applicant**), the applicant for the substantive application for the Ryans Road Industrial Development (**Application**) under the Fast-track Approvals Act 2024 (**FTAA**).
- 2 On 6 March 2026, the Expert Panel issued Minute 13 (**Minute 13**) requesting further information and advice from the Applicant, Christchurch International Airport Limited (**CIAL**) and Airways Corporation of New Zealand (**Airways**).
- 3 The Applicant has provided the information requested of it within the timeframe specified in Minute 13.
- 4 Minute 13 also granted CIAL and Airways a further opportunity to respond to the “CGL Package” and to the revised set of conditions provided by the Applicant on 9 March 2026. At the conference on 4 March 2026, the Applicant advised the Panel that it wished to retain a right of reply to any material subsequently filed by either CIAL or Airways.
- 5 In Minute 13 the Panel stated:

[16] We would generally consider it appropriate to provide the Applicant with a limited opportunity to respond strictly in reply to any material filed by CIAL and Airways under paragraph [11] above.

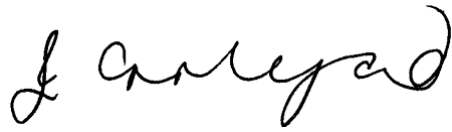
[17] The difficulty facing the Panel in this case is that there is insufficient time for the Applicant to provide a final response strictly in reply as would generally occur and for us to consider same before we are required to issue our draft decision on Monday 16 March 2026.

[18] We therefore have decided not to request further information from the Applicant in reply to the material we requested from Airways and CIAL
- 6 The Applicant has not yet had an opportunity to discuss the material filed by CIAL and Airways on 12 March 2026 with its experts (including Mr McPherson, who is based in the United Kingdom and Mr Hargreaves, who is based in Australia).

- 7 To assist the Panel, the Applicant wishes to confirm with its experts whether any further refinement of conditions is required as a result of matters raised in the evidence of:
 - (a) Mr Ford Scott Robertson for CIAL;
 - (b) Mr Jeffery Balchin for CIAL;
 - (c) Mr John Kyle for CIAL; and
 - (d) Mr Robert Grimm for Airways.
- 8 Accordingly, the Applicant requests that processing of the Application be suspended under s 64 of the FTAA.
- 9 Once it has conferred with its experts, the Applicant will advise the Panel whether any additional time is required to further refine the proposed conditions, and if so, the likely duration of the suspension. The Applicant expects to be in a position to do so promptly but wished to bring the suspension request to the Panel at the earliest opportunity.
- 10 The Applicant considers that the suspension sought will address the timing constraints identified in Minute 13 and will ensure procedural fairness to the Applicant.
- 11 The Applicant is also mindful that the Panel will require some additional time after the lodging of any further material to finalise its draft decision beyond the 1 working day currently available.
- 12 On this basis, the Applicant requests:
 - (a) processing of the Application be suspended pursuant to s 64; and
 - (b) if the Applicant considers that any further material is required, following discussion with its experts, it will advise the Panel early next week of the likely date on which that material will be provided, along with a suggested date for processing to resume, with the intention of ensuring the Panel has additional time after receipt of any additional material.

13 The Applicant thanks the Panel for its attention to this matter and remains available to provide any further clarification the Panel may require.

Dated this 13th day of March 2026

A handwritten signature in black ink, appearing to read 'J M Appleyard', written in a cursive style.

J M Appleyard / M E Davidson