

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

Supplementary statement of evidence of Benjamin John Hargreaves

17 March 2026

Applicant's solicitors:

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Supplementary statement of Ben Hargreaves

Introduction

- 1 My full name is Benjamin John Hargreaves.
- 2 I have been asked by the Applicant to prepare this supplementary statement of evidence to assist the Panel by responding to recent material filed on behalf of Airways New Zealand (**Airways**) and Christchurch International Airport Limited (**CIAL**), and to clarify the technical basis on which I have concluded that aviation effects are acceptable in aviation risk terms.
- 3 This statement will address:
 - (a) The Statement of Evidence of Ford Robertson, on behalf of CIAL, dated 12 March 2026.
 - (b) The Statement of Evidence of John Clifford Kyle, on behalf of CIAL, dated 12 March 2026.
 - (c) The scale and significance of the effects that I have assessed as ‘not unacceptable’ and what I mean by that in aviation risk management terms.

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. 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.

Mr Robertson’s Evidence

- 5 Mr Robertson’s evidence suggests that the absence of a “full” or “structured” aeronautical study is a proxy for risk¹. However, his evidence

¹ See evidence of For Robertson, 12 March 2026, paragraphs 11-12

does not identify any specific deficiencies in the technical assessments of aviation safety provided on behalf of the applicant.

- 6 While Mr Robertson sets out, at a high level, what he would ordinarily expect an aeronautical study (of the type required of and prepared by CIAL as aerodrome operator²) to include, he does not explain which elements of the L+R Airport Consulting (**L+R**) (and other expert) aviation safety and risk assessments are wrong, incomplete, or unreliable.
- 7 Critically, Mr Robertson does not identify any specific adverse effect, quantified safety risk, or defined operational constraint that is likely to arise as a result of the proposal. Instead, his concerns are framed in terms of CIAL's expectations of process and the absence of further assessment, rather than specifying demonstrated failings in the assessments that have been undertaken to date.
- 8 I also note that the conditions proposed by the Applicant provide an additional safeguard and serve to address any remaining concerns, including those raised by Mr Robertson (for example, at [42]–[49] in relation to the potential effects on GCH Aviation operations).
- 9 With regard to Mr Robertson's comments concerning the applicability of NASF Guideline H, I confirm that I have read the assessment provided by Dr Andrew Shelley in his evidence dated 12 March 2026. Nothing in that assessment alters the outcome of the safeguarding assessment or affects any of the conclusions expressed in my evidence.
- 10 In summary, I do not consider that Mr Robertson's statement demonstrates that the assessment of aviation safety matters undertaken by the Applicant fails to identify relevant effects, or their potential magnitude.

Mr Kyle's Evidence

- 11 Throughout his evidence Mr Kyle asserts that the aviation safety related assessments undertaken to date and associated information provided are insufficient and therefore, in his view, it is *'not plausible to conclude that aviation risks are negligible, or even that they have been adequately identified or addressed'*³.

² Paras 37-38 of Mr Robertson's evidence notes that "the statutory obligation to undertake an aeronautical study rests with CIAL as aerodrome operator" and the study "is undertaken prior to [a] significant change occurring, or if that is not practicable, as soon as practicable after the change".

³ Evidence of John Kyle, 12 March 2026, paragraph 42.

- 12 However, Mr Kyle does not identify any specific aviation safety effect arising from the proposal, nor does he identify any deficiency in the assessment methodology, assumptions, inputs, or conclusions relied upon by the applicant's aviation experts.
- 13 I understand Mr Kyle's concern to be that the Applicant has not provided sufficient information to provide certainty at the consenting stage. It is my observation that the methodology adopted and assessments undertaken by the Applicant, provide:
- (a) An identification of hazards, as obtained through the initial and subsequent revisions of the L+R Christchurch International Airport Safeguarding Assessment, which considered matters set out in:
 - (i) The Christchurch District Plan;
 - (ii) Australian airport safeguarding practice (adopted and referenced in New Zealand by the NZ Airports industry association);
 - (iii) Comments raised by CIAL and Airways in consultation with the Applicant prior to the preparation of the Airport Safeguarding Assessment; and
 - (iv) Submissions by CIAL and Airways in response to the Application.
 - (b) A hazard analysis of identified issues.
 - (c) Assessment against accepted standards and guidance to determine the need for further investigation, mitigation or management.
 - (d) Identification and incorporation of mitigation and management measures through modification of the development proposals.
 - (e) Proposed consent conditions to manage any remaining residual risks to aviation safety or operations in a manner consistent with the processes of an aeronautical study as expected by CIAL.
- 14 I acknowledge that certain specific risks associated with nav aids and GCH helicopter operations as raised by Airways and CIAL respectively, may not yet have been managed to a level where those parties accept that the risks are either 'Negligible' or 'Tolerable if As Low As Reasonable Practicable (ALARP)' in standard risk management terminology. Nevertheless, I consider that additional proposed Condition 21D sets out a process to

achieve this outcome consistent with the aeronautical assessment processes as described by CIAL.

- 15 I therefore maintain my opinion set out in my supplementary statement of evidence dated 20 February 2026 that:

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.

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.

- 16 Finally, I consider that neither the proposed conditions, nor the existence of further processes that may need to be undertaken by Airways or CIAL under its own regulatory framework indicate that aviation safety risk is presently unmanaged, nor does it imply that development approval at this stage is unsafe or premature.

Significance of Effects

- 17 I understand that CIAL and Airways question the *significance* of potential aviation safety effects, insofar that our assessment of 28 November 2025 and evidence to date has concluded such effects will be 'adequately managed to an acceptable level through the mitigating measures proposed'.
- 18 In the risk management terminology generally adopted in the aviation context, I have taken both 'negligible' and 'tolerable if ALARP' outcomes (per para 14 above) to mean 'managed to an acceptable level' or 'not unacceptable'. I stand by my conclusion that the effects I have assessed (relying, where available, on the technical reports and evidence of the Applicant's other experts) will not be unacceptable.
- 19 In terms of this (Fast Track approvals) process, I understand that the assessment of effects on the environment (AEE) included with the application as originally filed, concluded in its executive summary that the

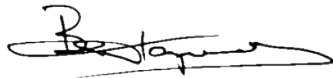
proposal would have **'no more than minor and acceptable actual or potential adverse effects on the environment'**⁴.

- 20 With reference to the classification of effects as set out in Table 1 of the AEE, and accounting for the mitigation or remediation achieved by way of the proposed consent conditions, it is my opinion that any potential adverse effects related to aviation matters will be either **'minor'**, insofar as they 'are noticeable but not at a concerning level, and mitigation or remediation may not be necessary' or **'less than minor'** insofar that they 'are discernible but too small to have any meaningful impact'.

Conclusion

- 21 This further statement reaffirms the conclusions in the assessments and evidence I have provided to date and I remain of the view that any potential effects related to aviation matters will be **minor** or **less than minor**. Accordingly, in my opinion, the Panel has sufficient, reliable technical information before it to identify, evaluate, and weigh aviation safety effects for the purposes of its decision.

Dated 17 March 2026



Benjamin John Hargreaves

⁴ Para 17 of AEE, dated 15 April 2025 (See: [.CT-Ryans-Road-FT-AEE-20250320-AMENDED-FINAL_Redacted.pdf](#)).