

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

30 January 2026

Submitter's solicitors:

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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 (**Project**) under the Fast-track Approvals Act 2025 (**FTAA**).
- 2 On 19 January 2026, a memorandum was filed on behalf of Carter Group responding to Minute 7 of the Expert Panel (**Panel**). That memorandum proposed a timeframe for further discussions to occur between Christchurch International Airport Limited (**CIAL**), Airways New Zealand (**Airways**), and the Applicant's experts, and for a further reporting memorandum to be filed summarising the outcome of those discussions.
- 3 Since then, both CIAL and Airways have filed responses addressing the Applicant's proposed timeframes (dated 26 January 2026 and 29 January 2026 respectively). It is now clear from those responses that the further technical discussions proposed by the Applicant will not occur.
- 4 In light of CIAL and Airways' positions, the Applicant proposes to file a complete final package of:
 - (a) conditions;
 - (b) expert commentary that the conditions are appropriate; and
 - (c) legal submissions explaining how the application should be assessed in the framework of the FTAA.
- 5 To enable the Applicant to prepare that package, the Applicant requests that the processing of the application be suspended.¹ The Applicant anticipates that it will be in a position to file its final package by 16 February 2026 and at which time, it will ask for processing to resume. The Applicant's position is that the final package will provide the Panel sufficient information to issue its draft decision and conditions.

¹ Pursuant to section 64 of the FTAA.

- 6 The Applicant will also provide the comments sought in Minute 8 relating to the new national instruments by the 16 February 2026 and suggests that the other parties invited to provide comment are given the same date.

Dated 30 January 2026



Jo Appleyard
Counsel for the Applicant