
MINUTE 7 OF THE EXPERT PANEL

Invitation to comment

Ryans Road Industrial Area [FTAA-2504-1054]

(22 December 2025)

[1] The Expert Panel (Panel) has received responses to its request for further information contained within Minute 6 dated 9 December 2025.

[2] This Minute concerns responses received from the following parties:

(a) Supplementary submission from Airways Corporation of New Zealand (Airways) undated (Airways response), and

(b) Memorandum of counsel for Christchurch International Airport Ltd (CIAL), including feedback from Garden City helicopters (GCH)¹, dated 18 December 2025 (CIAL response).

[3] These documents relate to aviation safety matters and respond to the safeguarding assessments provided by the applicant.²

[4] The Airways response is that (among other matters) as the responsible provider of air navigation services to all air traffic in New Zealand, Airways strongly opposes the grant of consent for the Ryans Road Industrial Development without completion of further work that is required in these circumstances.³

[5] Further, the Airways response is that the safeguarding assessments have shown Airways that further action is required and Airways opposes the grant of

¹ See Attachment 3 of the CIAL memorandum of Counsel

² See Minute 6, Appendix 1 for details of the safeguarding assessments provided with the Applicant's response to comments on the Application

³ Supplementary submission from Airways Corporation of New Zealand at page 4

consent until Airways concerns regarding interference to CNS infrastructure have been addressed and the residual risk to aviation safety is proven to be as low as reasonably practicable. Airways estimates, based on previous exercises of this nature, that the timelines involved may take upwards of 6 – 9 months and may not provide the outcome sought by the applicant.⁴

[6] The CIAL response is that (among other matters) despite the volume and technical nature of the new material, the core deficiencies as to its assessment of aviation safety remain, because the foundational assessment of potential impacts on aviation safety (and therefore the appropriateness of development on this site) has still not been properly undertaken and this inadequacy cannot be cured within the confines and timing constraints of the FTAA process.⁵ The CIAL response elaborates on this point at paragraphs [18]-[21].

[7] Further, the CIAL response is that, regarding Minute 6's request for CIAL to comment on the proposed conditions and otherwise suggest amended or further conditions, CIAL cannot responsibly do so in the absence of a comprehensive aeronautical study. CIAL considers that to engage with conditions in the absence of an adequate evidential foundation would risk proceeding on untested assumptions regarding the relevant safety issues.⁶ Against this context the CIAL response seeks that the application be declined.

[8] While the Panel has not reached any substantive findings on this matter, it is clear from our initial review of these documents that Airways and CIAL (including GCH) have significant concerns regarding the adequacy of consultation by the applicant and the sufficiency of the applicant's safeguarding assessment. These matters raise questions for the panel about the most appropriate way to progress this application.

[9] The panel is mindful of the timeframe within which it is required to issue its decision on the application.

⁴ Supra at page 11

⁵ Memorandum of counsel for Christchurch International Airport Ltd at [8.3]

⁶ Supra at [41]

[10] We also understand that recent amendments to the Fast-track Approvals Act 2024 extend the total period during which processing can be suspended, if an application is suspended more than once under section 64, from 50 to 100 working days.⁷

[11] Against this context, the panel directs that:

- (a) The applicant considers how it would like the panel to proceed with the application and provide its response to this Minute by 19 January 2026; and
- (b) Airways and CIAL (inclusive of GCH) are to reply to the applicant's response by 24 January 2026.

[12] For the avoidance of doubt, the Panel is not seeking comment from the parties on the merits of the safety / operational comments received, but rather on procedural matters / next steps.

[13] Following receipt of the above, the panel is willing to convene a conference to discuss this matter in the New Year if that would assist the parties.



Chris Fowler
Expert Panel Chair

⁷ Fast-track Approvals Amendment Act 2025 at section 36(2)