

**BEFORE THE EXPERT PANEL**

**IN THE MATTER** of the Fast-Track Approvals Act 2024 (FTAA)  
**AND**  
**IN THE MATTER** of an application by Lodestone Energy Limited  
under section 42 of the FTAA for the construction  
of a solar farm  
**APPLICATION NO.** FTAA-2508-1097

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**TE RŪNANGA O MOERAKI AND TE RŪNANGA O WAIHAO  
RESPONSE TO INVITATION FOR COMMENTS BY THE EXPERT PANEL**

2 February 2026

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[REDACTED]

Nā Te Pō, Ko Te Ao	From eternity came the Universe
Nā Te Ao, ko Te Ao Marama	From the Universe, the bright clear light
Nā Te Ao Marama, ko Te Ao Tūroa	From the bright clear light, the enduring light
Nā Te Ao Tūroa, ko Te Kore Tē Whiwhia	From the enduring light, the void unattainable
Nā Te Kore Tē Whiwhia, ko Te Kore Tē Rawea	From the void unattainable, the void intangible
Nā Te Kore Tē Rawea, ko Te Kore Tē Tāmaua	From the void intangible, the void unstable
Nā Te Kore Tē Tāmaua, ko Te Kore Matua	From the void unstable, the void endowed with paternity
Nā Te Kore Matua, ko Te Mākū	From the void of paternity, came moisture
Nā Te Mākū, ka noho i a Mahora nui-ātea	From moisture, came limitless thought
Ka puta ki waho ko Raki	Then came the visible heavens
Nā Raki, ka noho i a Poko hārua te -pō	The visible heavens combined with the great abyss to produce the numberless sorceries and the ultimate calamity!!!
Ka puta ko Aoraki, ko Rakamamao, ko Tāwhirimatea	Thence to Aoraki and the winds and weather
Ko Tū Te Rakiwhanoa	To the creator of the land
Uira ki Te Mahānui a Maui	And the canoe of Māui
Ko Te Ao Takata	And finally to people
Tihei mauri ora!	I cough the breath of life!
Ko te kākahu o te mauka o Aoraki	To the cloak that covers the mountain,
Aoraki me tōna whanau o Rakirua, Rakiroa, Rārakiroa	To the family and brothers
Nā te mauka o Kakīroa me Horokoau	Over to Mt Sefton and Mt Tasman
Ko te whanau o Kā Tiritiri o Te Moana	And to the rest of the family of the Southern Alps
mai i te tane a Haupapa	To the male side of the Tasman Glacier

ki te taha wahine a Aroarokaehe	And to the female side and the Hooker Valley
Huri noa ki te awa tapu ki Kā Roimata o Aoraki	Then over to the source of the “Tears of Aoraki”
Nā te roto o Pūkaki, ko te roto tapu o Takapō	And on to the sacred lakes of Pūkaki and Takapō
Ko te roto o Ohou, ko Te Manahuna te whenua	And to Lake Ōhau and the valley of Te Manahuna
Ki kā huarahi ki te tihi o te mauka o Te Rua Taniwha	And travelling the ancient path to the mountain,
mai i Te Ruataniwha ki Te Ao Marama!	And then to the world of light, Te Ao Marama
Nā te wharenuī o Te Whakaahua-a-raki nō Te Maiharoa	And on to the place of the whare of the chief,
Te Maiharoa Ko Te Poho o Rakitāmau,	And the burial mound on Māori Hummock
Mai i Te Kai Hikihiki, ki Ōtamatakou,	And on to Otematata
Ki Te Wharekuri, ki Te Awakino	And Te Wharekuri and Te Awakino
mai i Te Kohurau, ko Oteake	And the mountain Te Kohurau and the place, Oteake
mai i Ote kai ake, ko Te Maerewhenua	And Ote kai ake and Duntroon
mai i Te Awamoko, ki Te Puna o Maru	On to Te Awamoko and the settlement of Te Puna a Maru
ko Korotuaheka te kaika tūturu, i tū ai te whare Tapu o Matiti	And finally arriving at the Waitaki River mouth and the house Matiti

David Higgins (Upoko), Tewera King (Upoko)

## **INTRODUCTION**

1. This written reply has been prepared by Aukaha in accordance with section 53(2) of the Fast Track Approvals Act 2024 on behalf of Te Rūnanga o Moeraki (Moeraki) and Te Rūnanga o Waihao (Waihao) in response to the invitation for comments (Minute 2) by the Expert Panel (dated 15 December 2025), regarding the Lodestone Energy Fast Track application for approval for the Haldon Station solar farm.
2. Haldon Station is located within the shared takiwā of Te Rūnanga o Moeraki (Moeraki), Te Rūnanga o Waihao (Waihao) and Te Rūnanga o Arowhenua.
3. The takiwā of Te Rūnanga o Moeraki centres on Moeraki and extends from the Waitaki to the Waihemo (Shag River), and inland to Kā Tiritiri o te Moana (Main Divide). This includes shared interests with other Papatipu Rūnanga in Te Manahuna (Mackenzie Basin) and Tuawhenua (Queenstown Lakes and Central Otago). The takiwā of Te Rūnanga o Waihao centres on Wainono, sharing interests with Te Rūnanga o Arowhenua to the Waitaki, and extending inland to Ōmārama and the Main Divide.
4. Aukaha is a mana whenua-owned organisation that delivers services across the takiwā of our Papatipu Rūnaka shareholders.
5. Aukaha works alongside Aoraki Environmental Consultancy Limited (AECL) who are representing Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu (Kāi Tahu) planning staff on the Fast Track Projects within Te Manahuna (Mackenzie District).
6. Te Rūnanga o Moeraki and Te Rūnanga o Waihao support the comments of Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu (Kāi Tahu). Rather than repeating those comments, these comments on behalf of Moeraki and Waihao seek to complement and expand on the comments of Te Rūnanga o Ngāi Tahu (Kāi Tahu) and Aoraki Environmental Consultancy Limited (AECL) on behalf of Arowhenua.
7. These comments should not be read in isolation nor are they intended to lessen the messaging of the comments prepared by Kāi Tahu and AECL.

## **EXERCISE OF RAKATIRATAKA WITHIN THE UPPER WAITAKI AND TE MANAHUNA**

8. Kāi Tahu has a long history of active engagement with the Waitaki spanning over eight centuries. The Upper Waitaki and Te Manahuna remains of paramount importance to Kāi Tahu. As mana whenua, the members belonging to the three Papatipu Rūnanga, Te Rūnanga o Arowhenua, Te

Rūnanga o Waihao and Te Rūnanga o Moeraki (collectively mana whenua) have a responsibility to assess how the development of solar farms in Te Manahuna will impact their rights, values and practices.

9. The Upper Waitaki and Te Manahuna lies under the cloak of mana whenua rakatirataka and is cared for and managed by mana whenua to the greatest extent possible, in a manner consistent with kaitiakitaka. Mana whenua wish to develop a constructive relationship with Lodestone Energy that furthers the practical recognition of their rights, responsibilities and obligations to the whenua and wai māori.
10. The issues and impacts associated with the development of solar farms in Te Manahuna are not confined to maintaining the existing environment. Maintaining the current state of a highly modified catchment is not an option as mana whenua firmly believe that the whenua and waters of the Upper Waitaki and Te Manahuna need to be restored, enhanced and protected. The concern is that a narrow focus on the whenua most affected by the development of infrastructure to produce electricity could result in options for restoration and enhancement of mahika kai and Kai Tahu connections with whenua and wai being lost or limited.
11. When assessing the impacts of the Haldon Solar Project on their rights beliefs and practices, mana whenua cannot only focus on the impact on the current generation. Using mahika kai as an example; mana whenua have the right to benefit from mahika kai sourced from the catchment if they protect the integrity of what makes the Waitaki a mahika kai pātaka.<sup>1</sup> Ensuring that future generations can thrive is therefore a key focus.
12. In summary, mana whenua have approached discussions with Lodestone Energy intending to set a pathway whereby adverse effects will be addressed, and an agreed package of interventions is implemented that will achieve intergenerational outcomes.

#### **POSITIVE ASPECTS ASSOCIATED WITH SOLAR**

13. Moeraki and Waihao would like to emphasise to the Expert Panel that mana whenua are not opposed to the development of solar farms. Mana whenua support the development and construction of renewable energy in Te Manahuna in preference to the construction of large dam structures that flood and alter key/unique ecological, social, economic and cultural landscapes.

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<sup>1</sup> Storehouse

14. While Moeraki and Waihao support renewable energy proposals, mana whenua are also of the belief that such activities need to be in appropriate areas where the impacts of that infrastructure is avoided or appropriately mitigated, including the visual and physical impacts, the impact on the mana whenua relationship with wāhi tūpuna landscapes, and the impact on cultural redress returned through the Ngāi Tahu Settlement.

#### **WAITAKI IWI MANAGEMENT PLAN**

15. The Waitaki Iwi Management Plan 2019 was collaboratively developed by Moeraki, Waihao and Arowhenua as an expression of rakatirataka and in fulfilment of their kaitiaki responsibilities within Waitaki Catchment.

16. The vision of the Waitaki Iwi Management Plan is to:

*“Walk in the footsteps of our tūpuna and in doing so set a future pathway for our moko.*

*Ka whakawhārikitia e tātou te huarahi mō rātou ā muri ake nei, kia takahia kā tapuwae o kā tīpuna.”*

17. The protection of wāhi tupuna and the relationship that mana whenua have with these landscapes is a strategic objective of the plan.
18. Lodestone Energy has undertaken to provide opportunities for mana whenua to be actively involved throughout the project lifecycle to ensure that our values and relationships with the land are respected. Lodestone Energy, mana whenua and Te Rūnanga o Ngāi Tahu are continuing to explore opportunities that will enable the protection of the values of these landscapes and the exercise of rakatirataka by mana whenua.

#### **FURTHER ENGAGEMENT WITH LODESTONE ENERGY AND PROPOSED MECHANISMS**

19. The full details of engagement between Lodestone Energy, Te Rūnanga o Ngāi Tahu, Te Rūnanga o Moeraki, and Te Rūnanga o Waihao are set out in the comments made by Aoraki Environmental Consultancy on behalf of Te Rūnanga o Arowhenua. This engagement has included a site visit, correspondence and an in-person meeting in Ōtautahi.<sup>2</sup>
20. The commitment of Lodestone Energy to building a legacy relationship with mana whenua to minimise adverse cultural effects and actively contribute to mana-enhancing outcomes for current and future generations is acknowledged by Moeraki and Waihao. As noted in the

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<sup>2</sup> Christchurch

comments of AEC on behalf of Te Rūnanga o Arowhenua, Lodestone Energy and mana whenua are currently exploring opportunities to formalise a relationship outside of the conditions of consent that will enable mana whenua to exercise rakatirataka over the life of the project.

21. Moeraki and Waihao concur with Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu that appropriate mechanisms to manage and avoid, remedy, or mitigate potential adverse cultural effects should be secured through the consent conditions (should the resource consents sought through the substantive application be approved). In this context, the establishment of a Kaitiaki Governance Group (KGG) and a Cultural Monitoring Programme (CMP) as conditions of consent is strongly supported by Moeraki and Waihao.
22. These mechanisms would provide a framework for mana whenua to exercise rakatirataka, including involvement in monitoring the cultural and environmental effects of the Haldon Solar Farm, and advising on measures to avoid, remedy, or mitigate any identified adverse effects. Inclusion of these conditions would help ensure that cultural values are actively recognised and provided for, and that monitoring and reporting obligations are implemented for the duration of the project. Further, these mechanisms provide an opportunity for mana whenua to breathe life into their inter-generational relationship with Te Manahuna.

#### **POSITION OF TE RŪNANGA O MOERAKI AND TE RŪNANGA O WAIHAO**

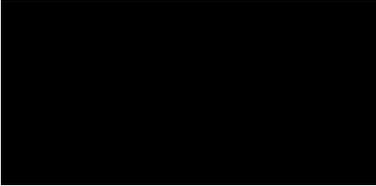
23. Moeraki and Waihao have adopted a neutral position on the substantive application.
24. Further engagement with Lodestone Energy is sought to clarify or narrow outstanding issues, refine the conditions of consent, and to provide certainty that the cultural effects of the Haldon Solar Project will be mitigated for the duration of the consent (if granted).

#### **CONCLUSION**

25. Moeraki and Waihao thank the Expert Panel for the invitation to comment on the substantive application prepared by Lodestone Energy for the Haldon Solar Project.
26. While Te Rūnanga o Moeraki and Te Rūnanga o Waihao have adopted a neutral position on the substantive consent, this position has been reached on the understanding that Lodestone Energy is committed to building a long-term relationship with mana whenua and as such will act in good faith in response to the matters raised in these comments.
27. Te Rūnanga o Moeraki and Te Rūnanga o Waihao welcome the opportunity to continue working with Te Rūnanga o Arowhenua, Te Rūnanga o Ngāi Tahu, and Lodestone Energy to address the

matters raised, including the provision of further information and the development of consent conditions that enable ongoing mana whenua involvement and protection of cultural values and landscapes, should consent be granted

Nāku noa, nā



Cory Neale

Chief Executive, Aukaha

Dated: 2 February 2026

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