

**BEFORE THE PANEL CONVENER**

**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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**MEMORANDUM FROM TE RŪNANGA O AROWHENUA RESPONDING TO MINUTE ONE OF  
THE PANEL CONVENER**

29 October 2025

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## **Introduction**

1. This memorandum is provided on behalf of Te Rūnanga o Arowhenua (Arowhenua) in response to Minute 1 of the Panel Convener dated 22 October 2025 (Minute), regarding the Lodestone Energy Limited application for approval for the Haldon Station solar array farm.
2. Arowhenua is a principal hapū of Ngāi Tahu, acknowledged in Te Rūnanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 (Settlement Act). The takiwā of the hapū is centred at Arowhenua and extends from the Rakaia River in the north to the Waitaki River in the south, thence inland to the Main Divide sharing an interest with Te Rūnanga o Waihao and Te Rūnanga o Moeraki. Within this area, Arowhenua has maintained noho tūturu (ahi kā), meaning the tribe's 'fires' have been kept burning and that they actively exercise rangatiratanga.
3. Aoraki Environmental Consultancy Limited (AECL) are mandated to provide advice and act on its behalf in respect of environmental policy, planning and strategy matters. This includes representation on proposals being processed under the Fast-track Approvals Act 2024. A representative of AECL is available to attend the scheduled conference alongside a representative from Aukaha Limited and Te Rūnanga o Ngāi Tahu (Ngāi Tahu).
4. The Minute seeks participants views prior to a Convener's Conference on Monday 3 November 2025, that will inform decisions of the Convener regarding:
  - a) Appointment of panel members.
  - b) The timing of the panel decision.
  - c) Matters to consider when preparing for conference.

## **Issue (a) - Appointment of Panel Members**

5. Arowhenua consider it is highly desirable that at least one member of the panel have expertise in Ngāi Tahu tikanga, given the significance of Lake Benmore and the wider Waitaki area to the iwi and the centrality of tikanga to the approach adopted by Arowhenua.
6. AECL notes:

The application site is situated within or adjoining six Sites and Areas of Significance to Māori (SASM) under the Mackenzie District Plan. These include:

- a) SASM9 – Tauwharekura / Grays Hill;
- b) SASM19 – Lake Benmore (Statutory Acknowledgement Area under the Ngāi Tahu Claims Settlement Act 1998);
- c) SASM21 - Takapō River / Tekapo River;
- d) SASM37 - Pūkaki River;
- e) SASM48 - Te Pā-o-Kāti-Kurī / Mount Maggie; and
- f) SASM68 – Lake Benmore Nohoanga Site,

A description of each SASM and their associated values can be found within SASM-SCHED1 and SASM-SCHED2 of the Mackenzie District Council's EPlan. Information outlining the cultural landscape and the historical mapping tools used by Arowhenua and Ngāi Tahu to identify these sites and areas is deemed sensitive information that will need protecting.

#### **Issue (b) – Timing of Panel Decision**

7. Arowhenua considers the default time frame is likely to be sufficient, but suggests the Convener considers the following aspects:
  - a) Sufficient time to accommodate additional information requests by the Panel, under section 67 of the FTAA.
  - b) Sufficient time to review and comment on draft conditions under section 70(2) of the FTAA. The appropriate period of time to comment on draft conditions will depend on their complexity and the extent to which matters remain in contention.
8. AECL have not been provided an opportunity to comment on the draft conditions. AECL is happy to discuss timeframes and draft conditions at the Panel Convener Conference.

#### **Schedule 2 – Matters to Consider when Preparing for Conference**

##### Tikanga

9. The tikanga relevant to the application has not been identified in the application prepared by Lodestone Energy; therefore, Arowhenua and AECL would like to record the following:
  - a) The Waitaki lies under the cloak of mana whenua rangatiratanga and is cared for and managed by mana whenua to the greatest extent possible, in a manner consistent

with kaitiakitanga. The Waitaki Catchment remains of paramount importance to Ngāi Tahu. As mana whenua, Arowhenua have a responsibility to assess how the proposed solar farm impacts their rights, values and practices;

- b) Mana whenua firmly believe that the lands and waters of the Waitaki need to be restored, enhanced and protected. Their concern is that a narrow focus on the need to generate renewable energy without considering cumulative effects arising from existing hydro infrastructure and other solar array farm proposals in the Waitaki Catchment, could result in further alienation of Arowhenua from their ancestral lands. Large scale solar farms could also significantly restrict many options for restoration and enhancement of mahika kai resulting in connections with whenua and wai in the catchment as a whole, being lost or limited; and
- c) Also acknowledging that the approach of mana whenua to this application reflects the desire of Arowhenua to fulfil obligations and responsibilities to the whenua to the extent currently possible given the existence of the adjoining hydro power schemes and the modification of the catchment.

10. Mana whenua are also very conscious of the need to enable future generations to thrive in the catchment.

*"Ko tā te Waitaki mahi he manaaki i te motu"*

*"The generosity of the Waitaki provides for the nation"*

11. Tikanga still provides important context for their interest in the catchment and involvement in this application process (along with the importance of the proposed conditions of consent) but Arowhenua ultimately see the separate Kawenata as a key means of giving effect to the matters set out above. The Kawenata itself will not be produced in evidence.

#### Issues

12. It is noted that the substantive application filed by Lodestone Energy Limited sets out a consultation record with relevant Ngāi Tahu rūnaka. To date, very little consultation has taken place between Lodestone Energy Limited and Arowhenua / AECL. AECL can confirm that two of its Cultural Consultants visited the application site with the primary focus being to view the site and to consider the ecology of the area. In addition to these visits, an online

hui between Lodestone Energy Limited and representatives of Aukaha and AECL was held on 24 October 2025 for one hour.

13. Due to the limited consultation to date, AECL have been unable to ascertain the extent of contention or other disputed matters, whether the drafting of proposed consent conditions are sufficient (no draft management plans have been filed), and whether cumulative effects can be adequately resolved. In addition to these matters, Arowhenua have not had any discussions with Lodestone Energy Limited as to how Mātauranga Māori can be incorporated into the proposal.

### **Conclusion**

14. The Arowhenua representative (AECL) will be happy to elaborate further on any of the above points at the conference set for Monday 3 November 2025.
15. Arowhenua and AECL confirm their willingness to engage directly with the Applicant and Panel as necessary to advance the progress of the application.

Dated: 29 October 2025



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