

**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 NGĀI TAHU RESPONDING TO MINUTE ONE OF  
THE PANEL CONVENOR**

29 October 2025

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## **Response to Minute 1 of the Panel Convener: Convener's Conference 1 [FTAA-2508-1097]**

This memorandum is filed on behalf of Te Rūnanga o Ngāi Tahu in advance of the convenor's conference scheduled for Monday 3 November 2025 at 10 am.

The Minute seeks participant views prior to a convenor's conference, that will inform the decision of the Convenor regarding:

- a) Appointment of Panel Members.
- b) The timing of the panel decision.

Te Rūnanga o Ngāi Tahu (TRoNT) is the iwi authority over most of Te Wai Pounamu/the South Island as recognised in section 15 of Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act 1996). TRoNT is comprised of 18 papatipu rūnanga, who collectively represent the hapū and whānau of Ngāi Tahu and their ancestors, including Ngāti Mamoe and Waitaha (Ngāi Tahu whānui).

Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki are 3 of the 18 papatipu rūnanga that collectively comprise Te Rūnanga o Ngāi Tahu. As recognised in the Crown Apology to Ngāi Tahu, *"the Crown recognises Ngāi Tahu as the tangata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui"*.<sup>1</sup>

While TRoNT is the iwi authority, Papatipu Rūnanga are the legal entities who represent mana whenua – being the hapū and whānau who hold customary authority at place. In practice, for planning process, given the status of Papatipu Rūnanga as above, TRoNT defers to the expertise of mana whenua, as they are the experts on cultural values within their takiwā.

TRoNT is satisfied with the timeframe set out in Schedule 1, however it should be noted that time will be needed to consider further information that has not been provided in the substantial application and to consider draft consent conditions.

TRoNT considers that there may be some complex legal issues with this application. This is the first large solar farm to be established within Te Manahuna/Mackenzie Basin one of multiple large scale solar farms in proximity to each other. TRoNT has concerns about how to manage the cumulative effects of all these applications.

There has been insufficient consultation from Lodestone to determine what the principal issues in contention are. Ngāi Tahu have not met with Lodestone to discuss the issues to derive potential outcomes. However, some issues have been identified below.

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<sup>1</sup> Te Rūnanga submission, appendix A – Text of Crown Apology, paragraph 8

Ngāi Tahu have not been given the opportunity to comment on the draft conditions. Ngāi Tahu is happy to explore this further at the Convenor's Conference.

There is a need to understand cumulative effects and in particular the cumulative effects on the cultural landscape.

There is also a need to understand the visual impacts on the nohoanga site.

**Issues:**

- There has been no direct consultation with TRoNT.
- The application has not addressed the cumulative impact of having three solar farms in close proximity to each other. It also has not addressed the visual impact of the project on the nohoanga site.
- The application has made no specific assessment of potential adverse effects on taonga species.
- Te Ao Marama/Lake Benmore is a statutory acknowledgement area, there has been no assessment of the risks of stormwater discharges entering the lake via surface water and/or groundwater.

Advice on mātauranga and tikanga will be provided by mana whenua.

**Panel membership:**

Knowledge, skills and expertise required:

- (a) Understanding of Ngāi Tahu values, worldviews and tikanga particularly given the significance of the area and surrounding landscape to Ngāi Tahu. Understanding of statutory acknowledgment and deed of recognition over Te Ao Marama/Lake Benmore and the nohoanga entitlement that is within proximity to the application area.
- (b) Landscape expert – need to consider cumulative effects on landscape, including visual effects and natural landscape.
- (c) Ecologist – need to understand specific potential effects on taonga species (flora and fauna) and particular potential effects on avifauna.
- (d) Water Quality/Quantity expert – to understand effects of stormwater discharges to groundwater and potentially surface water entering Te Ao Marama/Lake Benmore.

A representative from Te Rūnanga o Ngāi Tahu will be in attendance at the conference on Monday 3 November 2025 at 10:00am.

Dated on: 30 October 2025



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