Fast-track

Te Kāwanatanga o Aotearoa
New Zealand Government

Your Comment on the Far North Solar Farm Project Application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email at substantive@fastrack.govt.nz

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation Name (if relevant)	Aoraki Environmental Consultancy Limited (AECL) on behalf of Te Rūnanga o Arowhenua		
First Name	[redacted]		
Last Name	[redacted]		
Postal Address	[redacted]		
Mobile Phone	[redacted]	**Work Phone**	[redacted]
Email	[redacted]		

2. We will email you draft conditions of consent for your comment			
☑	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

3. Please provide your comments on this application
Please find comments attached

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

BEFORE THE EXPERT PANEL

IN THE MATTER	of the Fast-Track Approvals Act 2024 (FTAA)
AND	
IN THE MATTER	of an application by Far North Solar Farm under section 42 of the FTAA for the construction of a solar farm
APPLICATION NO.	FTAA-2509-1100

TE RŪNANGA O AROWHENUA
RESPONSE TO INVITATION FOR COMMENTS BY EXPERT PANEL

19 February 2026

Prepared By:

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1. INTRODUCTION

1. This written reply has been prepared by Aoraki Environmental Consultancy Limited (AECL) in accordance with section 53(2) of the Fast Track Approvals Act 2024 on behalf of Te Rūnanga o Arowhenua (Arowhenua) in response to the invitation for comments (Minute 2) by the Expert Panel (dated 21 January 2026), regarding the Far North Solar Farm (FNSF) Fast Track substantive application for approval for 'The Point' array farm project.

2. The project site (The Point) is located within the takiwā (territory) of Arowhenua. The Waitaki Catchment in which Te Manahuna (Mackenzie District) is located is an area of rich cultural significance to Te Rūnanga o Ngāi Tahu (Kāi Tahu[1]) Iwi. Te Manahuna is the cradle of their creation stories, with the imagery of the area speaking of the footsteps of their tūpuna (ancestors). The place names, rivers and mountains also talk of these stories of their ancestors linking the cosmological world of the gods and present generations, reinforcing tribal identity and solidarity.

3. Arowhenua is a principal hapū of Kāi Tahu, acknowledged in Te Rūnanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 (NTCSA). The takiwā of Arowhenua centres on Arowhenua and extends from the Rakaia River to the Waitaki River, and the from the coast to Aoraki and the Main Divide (Aoraki and Kā Tiritiri-o-Te-Moana), which incorporates the entirety of the project site. Arowhenua Marae is located near the Te Umu Kaha (Temuka) and is situated near the historic pā Te Waiateruatī and the well-known Arowhenua Bush that sustained local Kāi Tahu. Arowhenua connects ancestrally to the waka Takitimu and Ārai-te-uru, the mauka's (mountain) Aoraki and Tarahoua, and the awas (river) Waitaki and Ōpihi.

4. AECL is a not-for-profit organisation mandated by Arowhenua to provide advice and act on its behalf in respect of all environmental policy, planning and strategy matters. This includes representation on proposals being processed under the Fast-Track Approvals Act 2024 (FTAA).

5. AECL are working closely alongside Aukaha who are representing the interests of Te Rūnanga o Waihao (Waihao) and Te Rūnanga o Moeraki (Moeraki) and Te Rūnanga o Ngāi Tahu (TRoNT) planning staff on the Fast Track projects located in the takiwā. This response seeks to complement and support the responses prepared by TRoNT and Aukaha. It is not the intent of

[1] *The Kāi Tahu dialect uses a 'k' interchangeable with 'ng'. The preference is to use a 'k', so southern Māori are known as Kāi Tahu, rather than Ngāi Tahu. In this document, the 'k' will be used except for names and references to legislation.*

AECL for this report to be read in isolation or to lessen the messaging of the responses prepared by TRoNT and Aukaha.

1.1. Arowhenua Position

6. Arowhenua do not support the proposed solar farm development. Arowhenua have concerns with the substantive application, and further information and engagement by FNSF is needed for Arowhenua to feel comfortable that all outstanding issues can be addressed satisfactorily.

2. OVERVIEW

7. Minute 2 does not ask specific questions that Arowhenua are required to answer, instead, it seeks general "comments on the substantive application" (para 1). This written response seeks to cover the following matters:

a) Positive Aspects Associated with Solar,
b) Consultation,
c) Concerns with Substantial Application,
d) Loss of Connection to the Site and Te Manahuna,
e) Cumulative Effects – Multiple Solar Farms in Te Manahuna,
f) Other Matters, and
g) Conclusion.

3. POSITIVE ASPECTS ASSOCIATED WITH SOLAR

8. Arowhenua would like to emphasise to the Expert Panel that Rūnaka are not opposed to solar farms. Arowhenua support the development and construction of renewable energy as opposed to the burning of fossil fuels and the construction of large dam structures that flood and alter key/unique ecological, social, economic and cultural landscapes.

9. Whilst Arowhenua Rūnaka support renewable energy proposals, they are also of the belief that such activities need to be situated in appropriate areas where the visual and physical impacts are avoided and/or appropriately mitigated. For example, introducing new plant species not known to exist in a landscape in order to screen a solar farm.

4. CONSULTATION

4.1 Engagement with Rūnaka

10. Arowhenua are concerned that the substantive application does not truly reflect the level of engagement FNSF have had with Rūnaka throughout the development of the Fast Track substantive application. Section 6.6 of the substantive application states "*engagement with Iwi and Rūnaka groups took place over a 10-month period from February to November 2023* [and] *included a total of 64 individual interactions with mana whenua groups and their agencies*" (page 47). This phrasing suggests that FNSF consulted extensively with Rūnaka prior to lodging their substantive application, which is disingenuous.

11. The consultation that took place between FNSF, Arowhenua representatives and AECL related to the resource consent application that was submitted to Mackenzie District Council and prior to the FTAA existence. The individual interactions referenced in Appendix I and Q of the substantive application include all interactions, which consisted largely of general administration related correspondence (emails) between FNSF staff and Environmental Entity staff. The true extent of genuine engagement only took place during a site visit on 20 July 2023, and online hui held on 13 July 2023 and 7 November 2023.

12. AECL can confirm that no interaction took place between FNSF and Arowhenua/AECL after 7 November 2023. Therefore, FNSF did not consult with Arowhenua or AECL on the Fast Track application to be listed on the FTAA nor the substantive application. A copy of the substantive application was not provided to Arowhenua and AECL prior to the Convenor Conference, instead all documentation was forwarded on by Canterbury Regional Council staff.

4.2 Fast Track Process

13. The first interaction Arowhenua and AECL had with FNSF as part of the Fast Track process was during the Convenor Conference on 17th November 2025. During this conference, the Convenor emphasised the need for applicants to communicate clearly and meaningfully 'engage' with manawhenua rather than simply 'consult', which the Convenor indicated can often appear to be tokenistic and superficial with the sole intent to just show a conversation took place. The Convenor strongly recommended to both FNSF and Rūnaka that a Scope of Works contract be signed between the parties to ensure Rūnaka and the Environmental Entities were reimbursed for their time and expertise and the Fast Track process was a 'user pays' system.

14. Following the Convenor Conference, time was taken to agree a Scope of Works contract with FNSF for AECL to partake in the Fast Track process. A scope of works contract was signed by FNSF on 10th December 2025. Following the signing of the Scope of Works contract, FNSF sought to have a site visit and a face-to-face hui the week commencing 15 December 2025. Given the week of the 15 December was the last full working week of the year before businesses closed for the Christmas and New Year break, AECL felt the expectations of FNSF were unrealistic. Regardless, an online meeting was held on 17 December 2025 to reset the relationship between FNSF, TRoNT, AECL, Aukaha and the Rūnaka[2]. It was also decided at the online meeting that a date for a site visit would be secured in the New Year once everyone had returned from their break.

15. A site visit was undertaken by representatives from TRoNT, AECL, Aukaha and Moeraki on 20 January 2026. Throughout the site visit, FNSF showed no genuine interest in the cultural narrative associated with the project site or wider area and no attempt was made to enquire about how Runaka could work alongside FNSF if the project was to proceed.

16. Following the site visit, an in-person meeting (wananga) involving representatives from FNSF, Rūnaka, TRoNT, AECL and Aukaha took place at TRoNT office in Christchurch on Wednesday 21 January 2026. The purpose of the meeting was to discuss the proposal, ascertain the level of support (if any) for the solar farm by Rūnaka, and explore potential mitigation and mātauranga Māori opportunities.

17. During the meeting FNSF indicated a commitment to build a relationship with manawhenua, to not only minimise adverse cultural effects (should the required approvals be granted) but to actively contribute to mana-enhancing outcomes for current and future Kāi Tahu Whānui, given the immense cultural significance of Te Manahuna. It was agreed by all present that FNSF would circulate to everyone involved in the meeting examples of kaitiaki forum conditions that FNSF had incorporated into resource consents for similar projects elsewhere in the country as a starting point in which an appropriate condition would be drafted together and then provided to the Expert Panel.

18. Given the pace in which fast track projects are worked through, Rūnaka, TRoNT, AECL and Aukaha believed a cultural management plan condition would be beneficial to the project as there would not be sufficient time for all the parties to sit down face to face and work through

[2] *Rūnaka refers to the collective Papatipu Rūnaka being Waihao, Moeraki and Arowhenua.*

and agree to how a kaitiaki forum would be established and administered, what matauranga Māori opportunities there were, and what opportunities there were for Rūnaka long term. It was agreed by all parties that a cultural management plan condition could be drafted relatively quickly to ensure it could be incorporated into the suite of conditions imposed by the Expert Panel. Rūnaka, TRoNT, AECL and Aukaha made it clear that the cultural management plan needed to at least set out:

a) What a relationship between FNSF and Rūnaka, would look like going forward,

b) A kaitiaki forum – how the forum would be established, administered, its scope and purpose, how it would facilitate ongoing engagement and feedback on the solar project (throughout the life of the project), how appropriate tikanga and kawa practices would be adhered to, as well as how rūnaka representatives would be reimbursed for their time.

c) Mitigation, ecological restoration and mātauranga Māori opportunities,

d) How manawhenua will be provided with opportunities to provide feedback on relevant management plans to ensure the ongoing protection of taonga species.

e) Outline the appropriate archaeological discovery requirements are in place during the construction phase of the project.

f) The ongoing involvement of Rūnaka, if FNSF was to on sell/pass on the consents to another party that the conditions and agreements with manawhenua are adhered to.

19. Given it was agreed by FNSF, Rūnaka, TRoNT, AECL and Aukaha that all parties would work collaboratively on the drafting a cultural management plan and/or kaitiaki forum condition, Arowhenua and AECL were surprised to see a kaitiaki forum condition circulated in their latest suite of draft conditions dated 04/02/2026 and 18/02/2026. Given this, Rūnaka wonder if the commitment to build a relationship with manawhenua is genuine or the desire to consult is simply a "to tick a box" situation to demonstrate consultation has taken place.

20. At the time of writing this response, AECL and Arowhenua have not been approached or met with FNSF to progress the consent condition discussion. Consequently, Arowhenua do not agree with sections 6.6 and 8.2 of the substantive application, which state "detailed engagement" took place and question FNSF's ongoing intentions and whether there is a genuine desire to "*explore opportunities to create positive cultural benefit through the implementation of activities associated with the EEP*" (page 47) and continue meaningful engagement with manawhenua throughout the project lifecycle in the spirit of partnership.

21. Regardless, Arowhenua and AECL would welcome the opportunity to explore opportunities to formalise a relationship and to provide certainty that the cultural effects will be mitigated for the duration of the consent (if granted). It is the desire of Arowhenua that FNSF works collaboratively with Rūnaka, Kāi Tahu, AECL and Aukaha to formulate appropriate consent conditions to better align with the feedback received from manawhenua.

4.3 Summary of Consultation

22. To assist the Panel is understanding the consultation that has taken place over the past 12 months between Arowhenua and FNSF, a summary is outlined below.

Table 1: Summary of Consultation in past 12 months.

Date	Consultation and Purpose
17/11/2025	Convenor Conference (online)
17/12/2025	Online meeting with representatives from FNSF, Arowhenua, AECL, Aukaha and TRoNT to reset the relationship going forward.
20/01/2026	Site visit to project site with representatives from FNSF, Arowhenua, AECL, Aukaha, Moeraki and TRoNT
21/01/2026	Face to face meeting with representatives from FNSF, Arowhenua, AECL, Aukaha, Waihao, Moeraki and TRoNT to discuss the project and outline a process going forward. Opened the discussion regarding collaborating on the preparation of draft conditions.

5. CONCERNS WITH SUBSTANTIVE APPLICATION

5.1 Cultural Impact Assessment

23. The Cultural Impact Assessment (included within Appendix Q) prepared by Mr Dee Paepae Isaacs[3] of DPI Consulting Limited is inadequate to enable the Expert Panel to assess the potential significant adverse impacts on the cultural values associated with the application site and the wider Te Manahuna area.

24. Mr Isaacs acknowledges the significance of the site and surrounding area to Kāi Tahu and Rūnaka and "*there is the potential for the solar farm to further degrade the environment and weaken the connection to place and the wāhi tupuna values held by Rūnaka*" (section 2.1). However, the assessment does not explore how the project will degrade the environment and what measures will be put in place to ensure the connection to place for Rūnaka is not lost. Instead,

[3] *Mr Isaac Dee is affiliated with Te Aupōuri in the far north of Te Kao, Ngāti Tūwharetoa and Te Ātihaunui a Pāpārangi (Taumarunui), not Te Rūnanga o Ngāi Tahu.*

the assessment provides generic comments such as the legislation allows/encourages renewable energy; the project will assist in reducing greenhouse gas emissions; the proposal complies with Mackenzie District Council's Plan Change 18; and the project has support from the South Canterbury Chamber of Commerce. Whilst this assessment may have positive connotations, none are relevant to the relationship Arowhenua have with the application site and the wider Te Manahuna area.

25. To address the concerns of Arowhenua, Mr Isaac outlines in the cultural impact assessment that FNSF will offer Kā Rūnaka naming rights of the development, a formal commitment to recognising wāhi tūpuna in public project documentation and planning, and name mana whenua as stakeholders. Arowhenua feel these matters are tokenistic in nature and do not reflect a desire to truly understand how Kāi Tahu and Rūnaka connect to Te Manahuna through whakapapa nor does it clearly explain how Arowhenua tūpuna occupied and utilised the land within the Te Manahuna for survival as well as enjoyment.

26. Arowhenua also note that the cultural impact assessment places an emphasis on FNSF's willingness to engage and work alongside Arowhenua as well as actively engage in regional planning discussions to provide technical expertise. As set out in section 4 above, FNSF did not engage with Arowhenua and AECL before the Convenor Conference for 'The Point' project and they did not engage in the Mackenzie District Plan review process (particularly Plan Change 26 – Renewable Electricity Generation and Infrastructure) as a submitter or as an expert. Given this proven track record of lack of engagement, Arowhenua would need more consistent engagement with FNSF before Arowhenua feel comfortable moving forward in a meaningful manner if the project was to be granted consent through the FTAA.

5.2 Assessment of Planning Instruments

27. Arowhenua and AECL will not provide a detailed assessment of the relevant planning provisions[4] as this is best completed by the representatives of each Council; however, AECL would like to make the following comments:

Cultural Effects Assessment

28. The cultural effects section (section 6.6) of the substantive application outlines the extent of engagement that FNSF undertook with the Rūnaka. The section does not provide an assessment

[4] *This includes the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009, Mackenzie District Plan, Canterbury Regional Policy Statement, Canterbury Air Regional Plan, and Canterbury Land and Water Regional Plan.*

of the proposed activity on cultural values like it does with the other sections of the Assessment of Effects on the Environment (section 6).

Mackenzie District Plan

29. The substantive application prepared on behalf of FNSF does not provide an assessment of the cultural values associated with the following adjoining SASM sites:

    a. SASM4 and SASM5 – Hakataramea Valley/River Trails
    b. SASM19 – Te Ao Mārama/Lake Benmore,
    c. SASM21 – Takapō River,
    d. SASM35 – Whakatipu/Twizel River,
    e. SASM37 – Pūkaki River, and
    f. SASM46 – Ōhau River.

30. Given the location of the application site and its proximity to multiple SASM rivers and ancient trails, an assessment of the relevant objectives and policies of the Mackenzie District Plan would have been expected. At the time of lodging the substantive application with the Environmental Protection Agency all SASM provisions had legal effect and were deemed operative. AECL believe an assessment of SASM Objectives SASM-02 and SASM-04; and SASM Policies SASM-P3, SASM-P4, and SASM-P5 would have been beneficial in assisting the Expert Panel in determining whether the proposed activity would be consistent with the Mackenzie District Plan.

Canterbury Regional Policy Statement and Canterbury Land and Water Regional Plan

31. Arowhenua and AECL acknowledge the substantive application provides an assessment of the objectives and policies of both the Canterbury Regional Policy Statement and the Canterbury Land and Water Regional Plan; however, Arowhenua and AECL do not believe the assessment addresses all the relevant provisions. In terms of the Canterbury Regional Policy Statement, an assessment of Chapter 2 (Ngāi Tahu) appears to have been missed. In terms of the Canterbury Land and Water Regional Plan the substantive application does not provide an assessment of general policies 4.14B (Ngāi Tahu values associated with discharges to land) and 4.101 (critical habitats) nor does it assess the Waitaki Catchment specific policies in section 15B. An accurate assessment of these provisions would have been beneficial in assisting the Expert Panel in determining whether the proposed activity would be consistent with the Canterbury Regional Policy Statement and the Canterbury Land and Water Regional Plan.

32. In terms of resource consents sought by FNSF, the substantive application fails to acknowledge that a farm land use consent is required pursuant to Rule 15B.2.28 of the Canterbury Land and Water Regional Plan. The Project site is greater than 10 ha in area and located in the Haldon Zone/Mid Catchment Zone; therefore, the property is required to have been registered in the Farm Portal system by 1 July 2019. According to Canterbury Maps, no farming land use consent appears to have been obtained by the landowner for the existing pivot area or the remainder of the property. If FNSF are to graze sheep within the proposed solar farm site, a farm land use consent will also be required. A requirement of the farm land use consent is that a Farm Environment Plan and nutrient budget will be required to be prepared by an Accredited Farm Consultant. To ensure the grazing of sheep within the solar farm does not negatively impact mahinga kai, wāhi tapu or wāhi taonga, FNSF and the Accredited Farm Consultant will need to consult Rūnaka. FNSF have not approached Arowhenua or AECL in regard to this resource consent requirement.

5.3 Archaeological Sites and Wāhi Tapu

33. The proposed archaeological sites or wāhi tapu condition appears for all intents and purposes to be an accidental discovery protocol condition; however, the condition does not appear to contain the relevant components found in a standard condition. In addition to this, the condition has confused the roles of the Consenting Authority and Heritage New Zealand under the Heritage New Zealand Pouhere Taonga Act (2014). To assist the Expert Panel, an accidental discovery protocol condition prepared by Heritage New Zealand and agreed upon by the Rūnaka has been attached as Appendix 1 to this document.

5.4 Ecological Assessment – Taonga Species

34. The special association that Arowhenua have with taonga species is well known and acknowledged by the Central and Local Government agencies and FNSF.

35. Arowhenua and AECL undertook a review of the ecological assessment prepared by Wildlands Consultants (in May 2023), which indicated that up to 17 taonga bird species may be present within the project site, including kaki (black stilt), tara (terns) and pārera (grey duck). The assessment further identified that the site is immediately adjacent to an Important Bird Area (IBA), and that a full suite of endemic braided river birds was found in braided river habitat at the Delta (noting that the site is in the wedge that forms the Ōhau-Tekapo Delta, where the Ōhau and Takapō Rivers enter Lake Benmore).

36. In terms of vegetation and habitats, the May 2023 assessment stated that vegetation cover at the site was predominantly grazed exotic grassland and cropland, with some indigenous dryland and shrubland communities around the margins. While no wetlands were located on the site, there were a number of wetlands within 100m of the site boundary. The report concluded that there were six different vegetation and habitat types identified on the site.

37. It is further noted that AgScience undertook a site visit on 17 December 2025 and reached completely different conclusions, indicating that there was no indigenous vegetation communities present at the site and that no further ecological assessment was required given the high degree of modification taken place on site that would have eliminated any remaining natural habitat for indigenous fauna.

38. Given the polarising conclusions of the AgScience survey, it is understood that additional vegetation surveys were conducted by Wildlands in January 2026. Those surveys reportedly found that the site had undergone only very minor changes in vegetation and habitat since the 2022 survey (which informed the May 2023 assessment). On that basis, it is understood that the December 2025 AgScience observations have been superseded by the January 2026 Wildlands Consultants survey work and further assessment currently being undertaken by Wildlands Consultants, including targeted surveys and mapping of lizards, invertebrates and birds as well as quantitative vegetation surveys.

39. As such, the potential presence of taonga species and the site's proximity to significant braided river habitat is considered to reinforce the importance of ensuring that ecological mitigation and if necessary, compensation measures are robust, culturally informed, and responsive to the values Ngāi Tahu associate with these species and habitats.

40. Arowhenua understands that changes to the proposed ecological enhancement approach are being worked through by FNSF with the Department of Conservation. The RFI response submitted by Wildlands (in response to expert panel's ecological queries) confirms that full details of the revised draft ecological enhancement plan will be available on 23 February 2026. The anticipated scope of the revisions is noted to include:

    a) a 14 ha enhancement area around two gullies that is predator-proof fenced,

    b) pest animal and plant management throughout the site;

    c) indigenous woody vegetation within the visual screening planting areas;

d) several additional clusters of indigenous woody revegetation along the eastern side of the site; and

e) establishment of several rock features as habitat enhancements (for lizards and invertebrates).

41. Arowhenua anticipates that AECL will be provided with an opportunity to provide input on these revisions, either directly with FNSF (or in collaboration with DOC) or through the kaitiaki forum as part of the ongoing engagement throughout the life of the project.

42. In terms of the further surveys, the RFI response states that targeted surveys are underway for lizards, avifauna and threatened plants and quantitative vegetation surveys are intended to reduce uncertainty and refine ecological management prior to construction. Arowhenua look forward to reviewing this work and providing a response on 27 February 2026.

5.5 Water Supply

43. During the Overview Conference with the Expert Panel, FNSF indicated that water tanks will be installed on site. FNSF noted that the water tanks will provide water supply for firefighting purposes as well as for the irrigation of new indigenous plants planted for screening and ecological restoration purposes.

44. Arowhenua is concerned that if an electrical fire was to become established within the dry and wind-swept environment or a fire was to start on adjoining land and encompass the project site that the water held in the tanks would be insufficient to combat a large-scale fire.

45. It is recommended that further assessment is provided by FNSF to ensure the effects of fire are mitigated to the fullest extent possible.

5.6 National and Regional Benefits of Project

46. Arowhenua note the substantial application states The Point project is expected to deliver regionally and nationally significant infrastructure by supplying electricity to approximately 100,000 households annually. Further, section 4.4 of the substantive application anticipates that approximately 250 jobs will be created during the construction phase of the project (approximately 12 months), while approximately five direct jobs will be sustained during the operational phase, due to ongoing maintenance monitoring activities. Arowhenua note that these job opportunities are very similar to that set out in the Lodestone Solar Energy substantial application; however, the FNSF proposal is substantially larger in scale.

47. Arowhenua are uncertain in terms of the projects ability to deliver these economic benefits long term. Arowhenua acknowledge employment opportunities will be generated during the construction phase; however, this is for a short duration and likely to be tendered to established construction teams experienced in large scale solar development that are located outside of the district, not the residents of Fairlie, Tekapo and Twizel or Rūnaka.

48. Longer term, employment opportunities for those residing in the Mackenzie District along with Rūnaka will be minimal given the need for specialised electrical engineering skills and the likelihood of FNSF having already hired these staff to maintain and service all FNSF solar farms across New Zealand, not just The Point Solar project. Consequently, long term employment opportunities may be fewer than what is required to maintain current farming practices, having negative flow on effects to the local economy due to fewer people residing and shopping in the District.

49. As a result, uncertainty remains in terms of the projects ability to deliver the anticipated infrastructure and economic benefits. These matters are closely linked to Arowhenua concerns about cumulative effects.

6. LOSS OF CONNECTION TO SITE AND TE MANAHUNA

50. As indicated in paragraph two above, the Arowhenua association with the Waitaki Catchment (including Te Manahuna) extends back to the first human habitation of Te Wai Pounamu. To assist the Expert Panel in understanding the connection Arowhenua have with the site and surrounding area, AECL have chosen to explain this through the response prepared on behalf of Arowhenua.

51. The Waitaki River (now Te Ao Mārama/Lake Benmore) and the significant landforms of Te Manahuna, including the nearby Benmore Range represent the sacred ancestors (cosmological world) from whom Kāi Tahu descend. The mountains, lakes, rivers and valleys are essential elements in the identity of Kāi Tahu as an iwi.

52. Arowhenua is concerned that the establishment of large solar farms on the edge of Te Ao Marama/Lake Benmore (Waitaki River), Twizel River, Takapō River, Ōhau River and Pūkaki River will further alienate Arowhenua from their ancestral land, further severing the links present generations have with their whakapapa, negatively impacting the identity of Tamariki (children).

53. Prior to European settlement, Arowhenua moved extensively through South Canterbury, the Waitaki and Te Manahuna hunting and gathering resources from the land and rivers. Movements were according to the seasons following the lifecycles of animals and plants, and the high country of Te Manahuna was a fundamental element of these systematic seasonal food gathering patterns. Arowhenua undertook seasonal migrations to the high country to gather food resources such as weka, kākāpō, kiore (*Rattus exulan*) and tuna (eels) utilising ancient trails that followed food and freshwater resources, which were consumed by Arowhenua members on their journeys. These trails (also referred to as 'taoka') were the arteries of economic (trade) and social relationships, critical to the survival of Arowhenua. An example of the connection between the project site and Arowhenua is the location of a kāika[5] mahinga kai site (known as 'Kahuika') situated at the junction of the Ōhau, Pūkaki and Takapō Rivers. Located at the southern tip of the application site, Kahuika was a strategic kāika that Kāi Tahu and Arowhenua would utilise during periods of seasonal harvest, particularly tuna (eels) and turnips.

54. With colonisation and early European settlers arriving in New Zealand, large areas of land were taken through Kemp's Deed preventing Kāi Tahu from accessing significant portions of Te Manahuna. The European style government system also saw the introduction of regional and district boundary lines to assist in the governance of land areas. These boundary lines did not align with Iwi and/or rūnaka takiwā boundaries resulting in traditional *ki uta ki tai* management styles being lost and in more recent times, Arowhenua having to navigate a political system that requires consultation with multiple Local Government [6]organisations. This alienation of Arowhenua from their land, known as *te tango whenua* (the taking of the land) has had profound and ongoing impacts on the economic, social and cultural wellbeing of Arowhenua as their ability to access land and water ways in order partake in traditional mahika kai gathering activities was significantly severed.

55. Between 1920 and 1970, Arowhenua witnessed further alienation from significant areas of Te Manahuna with the introduction of eight hydroelectric power stations associated with the Waitaki River, through the creation of Lakes Aviemore, Ōhau, Pūkaki, Takapō, Te Ao Marama/Benmore, Ruataniwha and the Takapō, Ōhau and Pūkaki canals. The development of massive hydroelectricity saw traditional hunting expeditions to the mahika kai resources blocked

[5] *A kāika (kāinga) is a temporary or semi-permanent unfortified village or settlement utilised as a base during a harvest or hunt.*

[6] *The takiwā of Te Runanga o Arowhenua includes Ashburton District Council, Timaru District Council, Mackenzie District Council and Canterbury Regional Council (Environment Canterbury).*

and the ending of the historical economic trade of mahika kai by Rūnaka. The construction of the Waitaki hydro dams also saw numerous permanent and temporary nohoaka (occupation sites) urupā (burial site), wāhi tapu and wāhi taonga sites and māori rock art destroyed as the valley was flooded in order to create storage lakes.

56. In more recent times, the agricultural intensification and conversion of sheep and beef farms to dairy within Te Manahuna combined with the enforcement of property rights have created yet another "cultural barrier", preventing Arowhenua from accessing numerous urupā, wāhi tapu and wāhi taoka sites that are at the centre of memories and traditions passed down by Kāi Tahu tūpuna. The ability of Arowhenua rūnaka to access sacred sites and/or gather traditional mahika kai to pass the traditional knowledge on to their mokopuna[7] is reliant on landowners being willing to work alongside rūnaka and grant access. With an increase in racist rhetoric at the regional and national level becoming acceptable, Arowhenua have found landowners are either openly refusing access to mahika kai sites or they are leaning more and more on Health and Safety Regulations as a substitute. A consequence of this alienation, Arowhenua are reliant on external groups inviting Arowhenua to partake in restoration projects that are typically required to mitigate adverse environmental impacts arising from farming practices. Partaking in restoration projects and regenerating tuna (eel) stocks provides rūnaka with an opportunity to have a "hands on relationship" with their taonga.

57. Whilst Arowhenua still grieve the loss of their traditional connection with Te Manahuna, there is solace in the fact that large expanses of the basin were to be protected from further land use intensification through various planning instruments such as Outstanding Natural Landscape (ONL), Outstanding Natural Feature (ONF) and Site and Area of Significance to Māori (SASM) policy overlays within the Mackenzie District Plan. These attempts to protect Te Manahuna enables Arowhenua to visualise the landscape and imagine how their tupuna viewed and occupied the land. Being able to see and experience the open spaces assists Arowhenua in passing on the considerable knowledge of whakapapa, traditional trails and tauranga waka, places for gathering kai and other taonga that the tūpuna held to future generations.

58. As outlined above, Arowhenua are not in opposition to renewable energy; however, Arowhenua are concerned that their takiwā has been unfairly targeted for the benefit of the rest of the country. The construction of hydro lakes and canals has seen large, braided rivers diverted and

[7] *Mokopuna - grandchildren*

channelled through stop banks and concrete hydro weirs at the expense of the unique habitats of indigenous plant, bird and fish species as well as the unique landforms and vistas utilised by Arowhenua for navigation purposes as well as keeping look out for territory defence purposes.

59. The introduction of agriculture and tourism has seen significant soil erosion, the draining of ecologically sensitive high-country wetlands to make way for agriculture, the introduction of animal pests for hunting purposes and the mass spread of pest plant species such as wilding pines. The slow destruction of Te Manahuna through the introduction of large-scale industrial/electrical infrastructure, the introduction of additional fertilisers to enhance pasture for sheep grazing purposes, permanent security fencing, new access roads, and consent durations that span multiple decades is seen by Arowhenua as "a death by a thousand cuts". Arowhenua now ask the Expert Panel, how much more of the takiwā has to be permanently modified and negatively impacted for the benefit of the rest of the country? For Arowhenua, the granting of the suite of consents for the FNSF project will not see the spiritual and cultural needs of manawhenua being met.

7. CUMULATIVE EFFECTS - MULTIPLE SOLAR FARMS IN TE MANAHUNA

60. The substantive application prepared by Williamson Water and Land Advisory and the cultural impact assessment prepared by Dee Isaac both claim "*the solar farm will not be visible from most public viewing locations,* [and] *the Panel cannot consider cumulative effects based on any supposed projects that have not been submitted for* [FTAA] *resource consent*" (pages 2 and 3 of Cultural Impact Assessment). Consequently, an assessment of the cumulative effects of multiple solar farms within Te Manahuna was not provided in the substantive application. To assist the Expert Panel in understanding the impact of solar farm development on cultural values and taonga species, a brief assessment is provided below.

7.1 Location and Size of Proposed Solar Farms in Te Manahuna

61. As set out in the formal response prepared for the Lodestone Energy Limited, there are multiple solar farms proposed for Te Manahuna through the Fast Track process (FNSF, Nova Energy Limited, Helios Energy Limited, Balmoral Station, and Lodestone Energy Limited) that will occupy approximately 2,432 ha of Te Manahuna Basin. In addition to these known projects, Arowhenua is aware of a number of other solar farm projects that have yet to progress.

62. In terms of existing information on all potential large-scale solar developments planned in the area, Arowhenua is aware of nine proposals, and these have been illustrated in Figure 1 below.

The proposed solar farms to be considered through the Fast Track process have been identified in red while the solar farms yet to be considered through the Fast Track process or through the traditional RMA process have been identified in yellow.

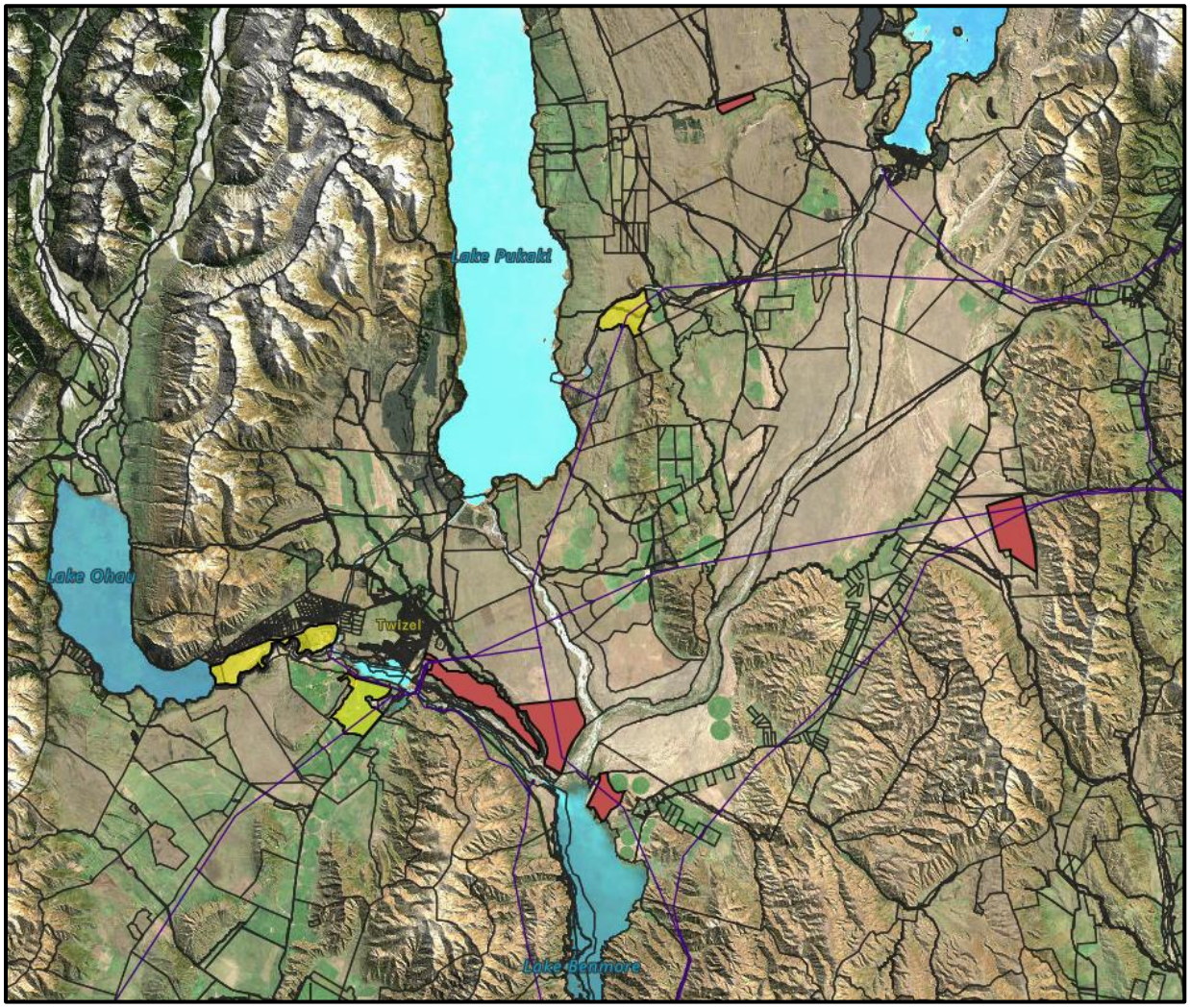

Figure 1: Location of Fast Track solar farm projects (red) and other future solar farms (yellow) yet to be lodged with Councils or the Environmental Protection Agency (Source: Canterbury Maps).

63. Figure 1 also illustrates the location of the Transpower transmission lines (purple) that criss-cross Te Manahuna. Whilst Arowhenua are aware of only nine solar farms (refer to Table 2 below), the location of the transmission lines demonstrates where future potential solar farms could be located if there was a market demand for additional solar electricity.

Table 2: Solar Farms Proposed for Te Manahuna.

Project Name	Solar Farm Size	Colour on Map	Process – Fast Track / RMA
FNSF – Haldon Solar	180 MW	Red	Fast Track (listed)
Far North Solar – The Point Solar Farm	**450 MW**	**Red**	**Fast Track (listed)**
Nova Energy – Twizel Solar Project	300 MW	Red	Fast Track (referral)
Helios Energy – Grampians Solar Project	300 MW	Red	Fast Track (referral)
Simpsons – Balmoral Station Solar Array	88 MW	Red	Fast Track (listed)
Far North Solar – Ōhau A (area has been defined)	280 MW	Yellow	Undetermined
Twizel Solar Farm Ltd – Twizel Solar (area has been defined)	280 MW	Yellow	RMA
Contact Energy (previously Manawa Energy – Irishman Creek Station (extent is currently unknown)	220 MW	Yellow	Undetermined
Kakariki Renewables – Mackenzie Basin Solar (extent is currently unknown)	600+ MW	Not shown – location not known	Undetermined

64. Arowhenua have heard Kākāriki Renewables[8] are investigating the construction of a 600+ megawatt solar farm with a 1,200 MWh battery energy storage system. Arowhenua and AECL do not know where the solar farm will be located or the area of land it will occupy. The Kākāriki Renewables website states the project is at the "planning approvals, community and iwi engagement, and commercial agreements are advanced to prepare projects for financial closure" stage; however, no one from Kākāriki Renewables has been in contact with Kai Tahu, Arowhenua, or AECL to discuss the proposal. Given this solar farm is another potential development located within Te Manahuna, AECL have included the project in Table 2 above.

7.2 Effects on Landscape Character and Naturalness

65. Arowhenua acknowledge the distinctive natural landscape of Te Manahuna has been permanently modified through the creation of the hydro scheme, agriculture and the greening of the landscape as a result of introduction of intensified agriculture, and this has altered the baseline level for future development. However, this application introduces a large scale industrial equipment that covers expansive areas of the basin.

[8] *Website for proposal is https://kakarikirenewables.com/mackenzie-solar*

66. The project site has been subjected to varying degrees of agricultural development over a long period of time, and this is emphasised extensively in the substantive application. FNSF imply through the substantive application and online conferencing that the project site is in a degraded state characterised by depleted pasture, hieracium infestation and bare soil, making the property uneconomic from a farming perspective, and only the creation of a solar farm with specific ecological restoration will remedy the situation, taking the site from a barren wasteland to productive pasture with a level of naturalness around the periphery. Arowhenua note that the substantive application states FNSF propose to graze sheep within the confines of project site, and this was emphasised during the site visit. At present, the site is not suitable for sheep grazing and Arowhenua is concerned that in order for sheep to be present there will be a need to convert the land to pasture following construction, which will require synthetic fertilisers to be utilised. Consequently, the introduction of solar will exacerbate the modified landscape further, not protect the environment.

67. When considering the landscape and natural character of the wider environment, the FNSF has had a tendency to focus inwards and view the physical effects from within the property boundaries of the application site rather than looking at the project from an outward looking in perspective. Arowhenua are concerned that the construction of multiple solar farms will see further greening of the landscape through the introduction of large scale screen planting. In order to screen the expansive landscape from the various viewing sites situated at a high altitude there will be a need to introduce shrubs and trees that are not typically found in the Basin or if they are in the density screening requires. Arowhenua are also concerned that the substantive application has not assessed the cumulative effects of extensive screening planting around multiple solar farms located within proximity of each other, and the impact this will have on the ability of manawhenua, tourists and the general public to view the basin floor which, forms an impressive, broadly homogenous and natural looking foreground to the expansive views of the Alps and Lake Pūkaki.

68. During the site visit to FNSF project site on 20 January 2026 it was clear that ‘The Point” is situated at a substantially higher ground level than both the Haldon Solar and the Nova Energy sites. It was also ascertained that the Haldon Solar and Nova Energy sites were clearly visible from ‘The Point’. The ability to view three large scale solar farm sites from the ‘The Point’ indicates that all three sites will be visible from Department of Conservation walking and mountain biking tracks on Benmore Range and Ben Ōhau Range. Altering large areas of the

Basin introduces concerns around the potential scale of solar farm (industrial) development within Te Manahuna beyond those being considered under the FTAA.

69. Arowhenua are deeply concerned that the Expert Panel can only assess the impact of those solar farm projects under the Fast Track process. With the potential for additional solar farm projects to proceed through a separate resource consent process, the ability to consider significant changes to the currently open landscape is fragmented. With the lack of a spatial plan and cohesiveness across the solar farm industry there is a risk that existing and future consents will be considered in an ad hoc manner, which can lead to adverse environmental effects that will exist for 70 years plus.

7.3 Issues with Connectivity and Capacity

70. FNSF state that they "*believe Haldon will have trouble connecting as The Point is taking the remaining available capacity in the lines which run through both sites*" (page 4 of Cultural Impact Assessment). Consequently, an assessment of the cumulative effects of multiple solar farms within Te Manahuna was not provided in the substantive application.

71. Following the response from Transpower to the Lodestone Energy Limited application, Arowhenua now understand that there are no immediate transmission capacity constraints that would limit the development of either the Haldon Solar or The Point project.

72. Regardless, Arowhenua considers it would be helpful for Transpower to also provide commentary on the potential cumulative transmission implications of the other three (listed or referred) projects that may be progressed to a substantive application stage under the FTAA. This is particularly relevant in relation to Nova Energy's project which is expected to the next substantive application anticipated to be lodged through the EPA at the end of April 2026.

7.4 Effects on Local and Wider Environment

73. Arowhenua is concerned the FNSF application has not addressed fully the direct and indirect cumulative effects on ecosystems. Solar power stations require the development of vast amounts of land resulting in cumulative effects on the surrounding terrestrial landscape including converting existing agricultural land or clearing and developing a site to provide efficient and effective sun exposure. This development can cause increases in soil erosion and compaction and increase fragmentation of habitats potential altering local biodiversity causing populations of intrinsically and economical important species to decline (e.g., pollinators).

74. It is the understanding of Arowhenua that once constructed solar farms can decrease soil evaporation rates, alter wind and weather patterns, and create heat island effects. These impacts can affect aquatic ecosystems by increasing local water temperatures impacting fish and aquatic organisms, fragment and reduce temporary surface-and groundwater networks, and increase mortality rates of aquatic insects and waterbirds as these species have been found to be attracted to photovoltaic (PV) cells. These matters are not well addressed in the FNSF application.

75. Maintenance of solar farms often requires regular vegetative care that can decrease native vegetation, allowing non-native and invasive vegetation to become more prevalent. Solar farms have often relied on easy to maintain groundcover (e.g., grass for grazing purposes) that can result in the use of machinery or herbicides and pesticides that have cumulative effects on multiple ecosystems, both terrestrial and aquatic. In addition to this, FNSF propose to graze the project site for the lifespan of the solar farm; therefore, the broader impact of agricultural practices need to be considered for the life of the solar farm, which will be in excess of 70 years.

76. To mitigate the indirect and direct cumulative effects of the deployment and maintenance of solar farms on multiple ecosystems, the location and the potential modification to the landscape needs to be carefully reviewed, especially if the sites are located in sensitive ecosystems that are easily disturbed and/or warmed, or there are multiple solar farms located within a short distance of each other.

77. International research shows that solar electrical panels lose their efficiency over time creating waste that can have cumulative effects on the environment. Waste produced can consist of toxic materials (e.g., cadmium, arsenic, nickel, and lead) that are hard to dispose of unless proper disposal methods, protocols, and policies are. At the present time, New Zealand does not have any infrastructure in place to handle toxic waste including its safe disposal (e.g., containment methods) or recovery methodologies (e.g., acid that allow waste products to either be reused in PV cell manufacturing or limit their impacts on the environment).

78. Arowhenua is aware that the solar industry has considered the creation of recycling plants especially for solar panels in order to reuse less toxic materials such as fiberglass, glass, coolant, and insulations in order to reduce waste production. However, again recycling facilities have not been established in New Zealand, and the current methods are not cost-effective at large scale

and need to be refined if they are to be fully implemented. Therefore, further work is required in this space before current (smaller) solar farms reach the end of their lifespan.

7.5 FNSF Response to RFI – Cumulative Effects

79. Arowhenua and AECL note RMM's RFI response (Appendix 5) includes a cumulative effects assessment which assesses the five listed or referred solar farm in Te Manahuna[9]. The assessment notes that the clustering of the Twizel, Point, and Haldon Solar farms in the southern basin, alongside existing hydro infrastructure and Twizel township, may reduce the perception of widespread development across the basin. Whilst this may be seen as a mitigating factor for some, for Arowhenua, concentrating all of the large scale infrastructure within the southern portion of Te Manahuna amplifies a sense of alienation from ancestral their land.

80. Arowhenua and AECL also note that the assessment concludes that cumulative effects in the southern basin would be reduced if the Haldon Solar farm did not proceed. The rhetoric adopted by FNSF in their substantive application and additional correspondence to the Expert Panel, emphasising the importance of their proposal over another is a concern for Arowhenua as this approach may be detrimental to the ability of solar farm companies to work in a collaborative manner if two or more consents were to be granted.

8. OTHER MATTERS

8.1 Renewable Energy Efficiencies

81. The substantive application prepared for FNSF has not addressed the issue of locating solar farms within a small geographical area of New Zealand that is isolated from the where the power is needed.

82. The substantive applications for each of the proposed solar array farms have all stated that there is the need to locate the solar farms within Te Manahuna due to the high sunshine hours, the flat topography, and proximity of sites to the national electricity grid created as a result of the adjoining hydro system.

83. Arowhenua is concerned that the matter of locating such large solar farms within proximity of each other will see electricity generated and fed electricity into the national grid at the same time means the energy source being the same and highly predictable. Being able to predict the

[9] The Twizel Solar Farm, The Point Solar Farm (the proposal), The Haldon Solar Farm, Grampians, Balmoral Station Solar Farm.

position of the sun in the sky many years in advance will result in the proportional output from each site being nearly identical. Consequently, the electricity generated is not distributed evenly over a 24 hour period or during peak periods (mornings and evenings), instead creating a boom and bust cycle meaning a reliance on other energy sources.

84. Another issue of locating large solar farms in proximity to each is that climatic and weather variance cannot be accommodated. Distributing renewable energy across New Zealand can enable security of supply.

85. Arowhenua are concerned that reliance upon development within this area by so many providers over such a large area could preclude the focus of providing alternatives closer to where the energy is required. For example, providing solar panels on the roof space of large-scale retail and commercial buildings and carparks in urban areas, on large industrial scale buildings and rural accessory buildings associated with dairy sheds. The current solar farm applications being processed through the Fast Track process appear to be developed without an overall guide to how best to provide power to New Zealand into the future. Additionally, there does not appear to be any accurate projections provided by Transpower to indicate future electricity demands, peak demand levels, and potential pinch points. Arowhenua appreciate the lack of direction provided by Transpower has enabled large commercial business proposals to design extremely large solar farms in order to secure the lion's share of the remaining electricity demand.

8.2 Collaborative Approach to Ecological Restoration and Pest Management

86. During the face to face meeting with FNSF on 21 January 2026, Arowhenua emphasised the desire of Rūnaka to be involved in the formulation and development of various management plans. Rūnaka appreciate the direct input of Department of Conservation and Environment Canterbury due to their scientific and ecological expertise; however, Arowhenua see the environment in a broader cultural context. Arowhenua are concerned that with the vast majority of the site being covered in solar panels and areas between the panels being grazed by sheep that the focus of the proposed ecological restoration will be for screening purposes and not providing suitable habitats for lizards, invertebrates and birds.

87. Through a ki uta ki tai approach, Arowhenua would appreciate the ability through AECL to also feed into the proposed ecological restoration to ascertain whether it could be possible to incorporate future mahika kai opportunities and seed sourcing for other ecological restoration

projects. Arowhenua are also heavily involved in pest management projects within Te Manahuna alongside DOC, and they would appreciate the ability to also feed into any proposed predator control methods to ensure there is a coordinated approach across the solar farm projects as well as with other programmes across Te Manahuna.

9. CONCLUSION

88. Arowhenua and AECL thank the Expert Panel for the invitation to comment on the substantive application prepared on behalf of FNSF.

89. Whilst Arowhenua is not opposed to the substantive application being approved by the Expert Panel, Arowhenua and AECL wish to emphasise that this position has been reached with a general understanding that the outstanding concerns held by Rūnaka and Kāi Tahu can be addressed through the approaches set out in our combined comments, which importantly includes Rūnaka establishing a meaningful and enduring relationship with FNSF and the landowner.

90. In addition, Arowhenua understands that FNSF is committed to establishing a relationship with Rūnaka and therefore, welcomes the opportunity to continue discussing the comments raised in this response through ongoing engagement.

Dated: 19 February 2026

[redacted]

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Ally Crane
General Manager
Aoraki Environmental Consultancy Limited

APPENDIX 1

Proposed Accidental Discovery Protocol Condition

Under the Heritage New Zealand Pouhere Taonga Act (2014) an archaeological site is defined as any place in New Zealand that was associated with human activity that occurred before 1900 and provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand. For pre-contact Māori sites this evidence may be in the form of bones, shells, charcoal, stones etc. In later sites of European/Chinese origin, artefacts such as bottle glass, crockery etc. may be found, or evidence of old foundations, wells, drains or similar structures. Burials/koiwi tangata may be found from any historic period.

In the event that an unidentified archaeological site is located during works, the following applies:

1. Work shall cease immediately at that place and within 20 m around the site.
2. The contractor must shut down all machinery, secure the area, and advise the Site Manager.
3. The Site Manager shall secure the site and notify the Heritage New Zealand Regional Archaeologist. Further assessment by an archaeologist may be required.
4 If the site is of Māori origin, the Site Manager shall notify the Heritage New Zealand Regional Archaeologist and the appropriate mana whenua (Arowhenua) or kaitiaki representative of the discovery and ensure site access to enable appropriate cultural procedures and tikanga to be undertaken, as long as all statutory requirements under legislation are met (Heritage New Zealand Pouhere Taonga Act, Protected Objects Act).
5. If human remains (koiwi tangata) are uncovered the Site Manager shall advise the Heritage New Zealand Regional Archaeologist, NZ Police and the appropriate iwi groups or kaitiaki representative (Arowhenua Marae) and the above process under #4 shall apply. Remains are not to be moved until such time as a mana whenua and Heritage New Zealand representative have responded.
6. Works affecting the archaeological site and any human remains (koiwi tangata) shall not resume until Heritage New Zealand gives written approval for work to continue. Further assessment by an archaeologist may be required.
7. Where mana whenua so request, any information recorded as the result of the find such as a description of location and content, is to be provided for their records.
8. Heritage New Zealand will determine if an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 is required for works to continue.

It is an offence under s87 of the Heritage New Zealand Pouhere Taonga Act 2014 to modify or destroy an archaeological site without an authority from Heritage New Zealand irrespective of whether the works are permitted or a consent has been issued under the Resource Management Act (or replacement legislation)

The contacts details for Arowhenua Marae are as follows:

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