

2 February 2026

**Expert Panel
Haldon Solar Farm
c/o Fast-Track Team
WELLINGTON**

By email to substantive@fasttrack.govt.nz

Tēnā koutou katoa,

Te Rūnanga o Ngāi Tahu comments on substantive application under the Fast-track Approvals Act 2024 – Haldon Solar Project [FTAA-2508-1097]

1. Introduction

- 1.1 Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) welcomes the opportunity to provide comments on the substantive application made by Lodestone Energy Limited (Lodestone Energy) for the Haldon Solar Project, in Te Manahuna (Mackenzie Basin) (the **Project**).
- 1.2 Te Rūnanga holds a neutral position on the substantive application, on the basis that Lodestone Energy is committed to building a meaningful and enduring relationship with mana whenua. As such, it is anticipated that Lodestone Energy will continue to work with mana whenua and Te Rūnanga to appropriately respond to and where possible, address the matters set out in these comments and in the separately provided comments of Te Rūnanga o Arowhenua, Te Rūnanga o Waihao, and Te Rūnanga o Moeraki (on behalf of mana whenua).
- 1.3 Te Rūnanga supports the comments made by Te Rūnanga o Arowhenua, Te Rūnanga o Waihao, and Te Rūnanga o Moeraki (**Mana Whenua**).

2. Te Rūnanga o Ngāi Tahu

- 2.1 These comments are made on behalf of Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) which is the statutorily recognised representative tribal body of Ngāi Tahu Whānui, as provided by section 15 of the Te Rūnanga o Ngāi Tahu Act 1996 (**TRONT Act**).
- 2.2 Te Rūnanga encompasses five hapū, Kati Kurī, Ngāti Irakehu, Kati Huirapa, Ngāi Te Ruahikihiki, Ngāi Tūāhuriri and 18 Papatipu Rūnanga, who uphold the mana whenua and mana moana of their respective rohe.
- 2.3 Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki are three 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”.¹

- 2.4 While Te Rūnanga 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 processes, given the status of Papatipu Rūnanga as above, Te Rūnanga defers to the expertise of mana whenua, as they are the experts on cultural values within their takiwā.
- 2.5 Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā (see **Appendix One**) and has done so since before the Crown began exercising its powers in New Zealand from 1840. The Takiwā covers most of Te Waipounamu and its surrounding islands, constituting over half of New Zealand’s landmass, coastlines and waterways. The Crown and Parliament recognise and affirm Ngāi Tahu rangatiratanga in our Takiwā through:
- a) Article II of Te Tiriti o Waitangi (**Te Tiriti**);
 - b) the 1997 Deed of Settlement between Ngāi Tahu and the Crown; and
 - c) the Ngāi Tahu Claims Settlement Act 1998 (**NTCSA**).
- 2.6 As recorded in the Crown Apology to Ngāi Tahu (see **Appendix Two**), the Ngāi Tahu Settlement marked a turning point, and the beginning of a “new age of co-operation”. The Crown apologised for its “past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries” and confirmed that “it recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui”. Those commitments are fundamental to the fast-track regime.

3. Comments on the Substantive Application

- 3.1. Our comments on the substantive application for the Haldon Solar Project (the Project) are set out below.

Statutory Acknowledgement- Te Ao Mārama

- 3.2. The project is located near the Statutory Acknowledgement for Te Ao Mārama (Lake Benmore). Ngāi Tahu cultural, spiritual, historic, and traditional associations with Te Ao Mārama are set out in Schedule 59 of the NTCSA (refer to **Appendix Three**) and include:
- Te Ao Mārama overlays the original path of the Waitaki River, which is of fundamental importance to Ngāi Tahu as the pathway of waters from Aoraki to the sea. Ngāi Tahu Whānui recognise the Waitaki as central to their identity and being.
 - The lake inundates areas of historical importance to Ngāi Tahu, including a number of nohoanga located in the area.
 - Numerous wāhi tapu and wāhi taonga were inundated by Te Ao Mārama, including rock art sites, while others remain. Urupā associated with these nohoanga also lie beneath the lake and are the resting places of Ngāi Tahu tūpuna, forming an important focus of whānau traditions.
 - Te Ao Mārama supports an important mahinga kai fishery, including long-finned eels (now depleted), freshwater mussels, and extensive stands of raupō along the lake margins.

¹ Te Rūnanga submission, appendix A – Text of Crown Apology, paragraph 8

- The area now covered by the lake was a major inland route linking the east and west coasts and formed part of seasonal resource-gathering networks extending into the Ōhau, Pūkaki, and Takapō catchments. The knowledge of these trails remains with whānau and hapū and is recognised as a taonga.
- The mauri of Te Ao Mārama represents the life-supporting essence that binds physical and spiritual elements together. The protection of mauri is central to the spiritual relationship of Ngāi Tahu Whānui with the lake.

Stormwater, Flooding, and Groundwater

- 3.3. While relatively large setbacks² between the solar arrays and Te Ao Mārama are proposed, Te Rūnanga is particularly concerned about the management of stormwater during both the construction and operational phase of the project, including potential changes in runoff volumes, water quality and erosion effects.
- 3.4. The substantive application concludes that adverse effects from stormwater generated at the site will be negligible on the basis that the site will remain as pastoral farmland, allowing rainfall to continue to infiltrate to the ground and that any localised concentration of flows will disperse across the surrounding area in a manner similar to existing site conditions. It is noted that flood risk assessments have been undertaken which indicate that the site and surrounding area generally consist of well-draining gravels, which is expected to limit surface runoff generation and that proposed onsite mitigations³ will manage onsite risks and minimise the likelihood of changes to off-site flow paths.
- 3.5. However, during a recent visit to Te Manahuna⁴ significantly raised water levels were observed in a number of waterways. This included elevated water levels in Te Ao Mārama (Lake Benmore) and steady flows in usually dry sections of the Pukaki River. The Haldon Campground as well as the nohoanga entitlement was also impacted by surface flooding, with campers moved out of the campground. Given the recent flooding of areas near the site and raised water levels in the lake, Te Rūnanga is concerned that the project site (i.e. nearest the lake) may have also been impacted by surface flooding and could be at risk of future flooding, but as no consideration of these types of flooding events has been provided in the application, potential flood risks remain uncertain.
- 3.6. While information on groundwater levels across the site is understood to be relatively limited, the initial geotechnical assessment notes that low-lying areas adjacent to Benmore Lake may have shallow perched water tables. This raises concerns regarding the potential impact elevated groundwater levels might have on soil infiltration capacity within the site (including whether it could increase surface runoff volumes or alter existing flow paths) and potential run-off discharges entering Te Ao Mārama (Lake Benmore).
- 3.7. Potential contaminant sources of concern include lubricants associated with the panel tracking mechanisms that allow the panels to rotate, oils associated with the proposed substation and sediment- laden runoff arising from soil disturbance and erosion under the solar panels and associated infrastructure.
- 3.8. Although the substantive application proposes conditions requiring the preparation of an erosion and sediment control plan, a dust management plan and a stormwater management plan, in the absence of a more detailed assessment of potential stormwater

² Approximately 200 metre setbacks proposed between the site and Te Ao Marama.

³ Mitigation proposed include diversion drains around the substation, positioning the substation on high ground, informal or formal fords, or culverts, where internal roads cross overland flow paths, position of power stations on high ground or on elevated platforms.

⁴ Tuesday 20 January 2026, visited Twizel and Far North Solar Farm site (the Point).

effects, including flood risks and groundwater conditions, it is unclear whether these measures will sufficiently mitigate potential adverse effects on Te Ao Mārama for the duration of the consent.

Haldon Arm Nohoanga Entitlement

- 3.9. Nohoanga provide Ngāi Tahu Whānui with an opportunity to experience the landscape as their Tūpuna did, to revitalise traditional practices of gathering food and other natural resources and pass this knowledge down to the next generation. The traditional concept of nohoanga (literally meaning ‘a place to sit’) has been given contemporary effect through the NTCSA by the allocation of specific temporary ‘camping’ sites (nohoanga entitlements) near significant waterbodies to support mahinga kai activities.
- 3.10. A nohoanga entitlement is located near the project site at Haldon Arm near the edge of Te Ao Mārama. Accordingly, adverse effects on Te Ao Mārama and the surrounding area have the potential to compromise Ngāi Tahu Whānui ability to utilise the nohoanga entitlement as intended under the settlement. This includes not only the ability to undertake mahinga kai activities but also pertains to the maintenance of cultural connections to the wider landscape.
- 3.11. It is important to note that these concerns extend beyond maintaining access to the nohoanga site itself and include Ngāi Tahu Whānui ability to access, experience and engage with the surrounding landscape. Nohoanga sites are intended to function as a base from which Ngāi Tahu Whānui can undertake mahinga kai activities and maintain cultural connections across the wider landscape, rather than being limited to the physical footprint of the site alone.
- 3.12. As the project involves the establishment of large-scale infrastructure, there is a risk that access to areas near the project site, could be further constrained by infrastructure protection requirements and health and safety considerations. Any such restrictions on access could impact on the usability of the nohoanga entitlement and undermine its intended purpose. This concern is heightened when the proposal is considered alongside other existing and proposed development in Te Manahuna⁵.
- 3.13. Te Rūnanga is also concerned about potential broader landscape and visual effects that may arise from the proposed scale of development. Such effects have the potential to adversely affect Ngāi Tahu Whānui ability to perceive and experience the landscape in a manner consistent with how it was experienced by their tūpuna, which may affect cultural identity, connection, and sense of place. The landscape effects assessment assesses the landscape and visual effects of the proposed solar farm and associated infrastructure, including likely visual amenity effects on the surrounding viewing audience and associated landscape character. In broad terms, the assessment concludes that the proposal will generate no more than minor adverse effects on the landscape at the project site and immediate setting, reducing to less than minor effects within the Sub-Basin. It further concludes that potential visual effects when viewed from Haldon Arm Road and from Te Ao Mārama and its landward margins immediately adjacent to the site would be no more than minor.
- 3.14. Te Rūnanga notes that the landscape assessment acknowledges that consideration of Māori cultural values is limited in scope and that, as Ngāi Tahu holds mana whenua over

⁵ Noting that at present there are two live substantive applications for solar farm proposals in the area, with a further substantive application anticipated by mid-2026. Further potential large-scale development that could arise includes two other listed projects for solar, while four other proposals are also currently progressing through various stages of project development.

the area, further input from Ngāi Tahu is required. Te Rūnanga can confirm that ongoing engagement is taking place between mana whenua, Te Rūnanga and Lodestone Energy to better understand and respond to potential landscape and visual effects, along with other relevant matters of concern from Ngāi Tahu perspective.

- 3.15. However, Te Rūnanga considers that these discussions are occurring with some uncertainty, given the ability of mana whenua to fully understand, assess, and respond to the potential landscape and visual effects of the project is complicated by the presence of existing and potential further large scale infrastructure development in Te Manahuna. When all of this development is considered in combination, it has the potential to incrementally alter the character of the landscape and the way it is experienced from the nohoanga entitlement and the surrounding landscape. This makes it challenging to meaningfully assess the long-term implications of the proposal in isolation, and to determine whether the cultural landscape values associated with the nohoanga and surrounding environment can be appropriately protected and provided for over time.

Taonga Species

- 3.16. The special association that Ngāi Tahu have with taonga species within the Ngāi Tahu Takiwā is acknowledged by the Crown in the NTCSA, with lists of taonga species contained in Schedules 97 and 98 (refer to **Appendix Four**). However, these schedules do not provide an exhaustive list of species regarded as taonga by Ngāi Tahu. For example, while Schedule 59 of the NTCSA identifies tuna (long-finned eel) as an important fishery within Te Ao Mārama, long-finned eels are not included in the taonga species lists in Schedules 97 and 98 of the NTCSA.
- 3.17. A review of the substantive applications for Haldon Solar Farm and Far North Solar Farm's nearby project (the Point), indicate that up to 17 taonga bird species may be present within the project site, including the nationally critically threatened kaki (black stilt). This raises concerns about the robustness of the applications consideration of potential impacts on avifauna. Ngāi Tahu is actively involved in kaki recovery efforts, which includes having statutory representation on the species recovery group, and as such is particularly concerned about the project's potential impacts on avifauna.
- 3.18. Regarding taonga plant species, while the substantive application notes that indigenous vegetation at the project site is limited due to historic land-use change and the presence of invasive exotic species, a stand of raupō was observed along the lake edge (near the project site) during a joint site visit by mana whenua, Te Rūnanga and Lodestone Energy in November 2025. Raupō is also listed as a taonga species in Schedule 97. Taonga fish species have not been considered in the substantive application, though a preliminary desktop information suggests that taonga fish species and associated habitats are likely to be present within Te Ao Mārama and the surrounding area.

Ecological assessment

- 3.19. Te Rūnanga considers that the ecological assessment provides a limited evaluation of potential effects on taonga species, both within the project site and the surrounding environment.
- 3.20. Te Rūnanga acknowledges that habitat values for taonga species within the project site may be limited, due to historic changes in land use, the reduced extent of remaining indigenous vegetation, and the absence of typical habitats for some species (such as riverbed environments for threatened bird species). However, the presence of raupō along the margins of Te Ao Marama (near the southern end of the site), indicates that the

surrounding environment may still provide important habitat and food resources for a range of species.

- 3.21. While the proposal does not involve direct works within these areas, the implications of establishing and operating the solar farm near these potential habitats and food sources are not understood. In particular, earthworks, vegetation clearance, and operational activities may lead to habitat loss or fragmentation and generate sediment and stormwater runoff, which could adversely affect taonga species, including birds, fish, invertebrates, and plants. Avifauna may also face an increased risk of injury or mortality when moving through or over the project site. In this context, Te Rūnanga notes that no dedicated avifauna or habitat assessment has been provided with the substantive application. While this may reflect the outcomes of onsite ecological investigations, the absence of such assessments is notable, particularly as they are typically included among the suite of technical studies prepared for large-scale solar farm developments.

Additional ecological assessments

- 3.22. Prior to finalising our comments, Te Rūnanga received copies of further ecological assessments undertaken at the project site⁶ from the Regional Council (Environment Canterbury). This information includes preliminary outcomes from additional lizard surveys as well as a terrestrial invertebrates' assessment. Based on an initial review, it is understood that the site may provide habitat for at least one type of lizard species as well as several types of grasshoppers, wētā and other invertebrate species and several notable plant species. In light of these findings, Te Rūnanga recommends that the applicant undertakes further surveys, including dedicated avifauna and fish assessments, to provide a more comprehensive understanding of potential impacts on taonga species and associated habitats.

Cumulative effects

- 3.23. Building on the concerns outlined above, Te Rūnanga considers that cumulative effects could arise overtime within Te Manahuna, particularly if multiple large-scale solar farms are built in the future. While it is understood that no large-scale solar farm projects have been approved or constructed in Te Manahuna and no determination has been made on this substantive application, it is noted that this substantive application and a substantive application for the Point solar farm are concurrently progressing under the FTAA, with a substantive application for another nearby large-scale solar farm expected to be lodged by mid-2026⁷. It is further noted that significant electricity network infrastructure already exists within the area, including several large-scale hydroelectric power schemes and associated transmission infrastructure.
- 3.24. In terms of existing information on all potential large-scale solar developments planned in Te Manahuna, Te Rūnanga is aware of nine proposals. A table summarising the available information on all identified solar farm proposals in the area is provided in **Appendix Five**. Te Rūnanga considers that at least five of the proposals have a high likelihood of progressing to a substantive application stage under the FTAA, noting that these projects are either listed under the FTAA or have been referred and therefore have the ability to lodge substantive applications. The remaining proposals are considered to have a high to moderate likelihood of progressing to a consenting stage, given that feasibility studies have largely been completed, sites have been secured, and in some cases, supporting technical

⁶ 23 January 2026 through Environment Canterbury.

⁷ Nova Energy's Twizel Solar Project.

assessments (such as engineering, ecological and visual assessments) have been commissioned.

- 3.25. If all nine solar farm projects (including the Haldon Solar Farm Project) were built, it is estimated that more than 3,550 hectares of Te Manahuna could be occupied by solar development, with over two million solar panels and associated infrastructure introduced across the landscape. If this scale of development did eventuate, it could result in a significant change of currently open landscapes to a more industrial type of landscape characterised by extensive solar infrastructure and associated built form. In turn, this change to the existing landscape could impact on Ngāi Tahu ability to connect with the landscape, including important landforms and waterbodies, and reduce habitat availability and ecological connectivity for taonga species across Te Manahuna.
- 3.26. Te Rūnanga is concerned that the substantive application has not considered the cumulative effects that may arise from the project in combination with existing electricity infrastructure in the area (including existing hydro-projects and transmission infrastructure). In addition, given the proximity between the project sites for Haldon Solar Farm and the Point and considering that substantive applications for both projects are currently being processed under the FTAA, an assessment of the cumulative effects that may arise if both projects are approved is also considered appropriate.
- 3.27. Separate from, but related to this concern, TRoNT understands there may be hard development constraints that could limit solar development in Te Manahuna. This matter is discussed further below.

Capacity constraints in existing transmission infrastructure

- 3.28. Te Rūnanga understands that capacity constraints exist within the transmission infrastructure which could physically limit the ability for multiple large-scale solar farms to be constructed in Te Manahuna.
- 3.29. Far North Solar Farm have previously advised that if their substantive application for the Point project is approved, it would utilise much of the remaining capacity, thereby limiting opportunities for other large-scale solar farms to connect. Further, at the recent project overview conference for the Point project, Far North Solar Farm referred to potential connection capacity for between two and three large-scale solar farm projects in Te Manahuna.
- 3.30. During recent engagement with Lodestone Energy, a short summary of the regional transmission capacity in the Mackenzie area (refer to **Appendix Six**) was received in relation to this concern. The supplied summary indicates that there is considerable spare capacity for four solar projects currently being considered through the fast-track process, including both the Point and Haldon Solar farms as well Twizel Solar Farm and Grampians Solar farm.
- 3.31. Lodestone Energy also provided broader economic and market commentary, which suggests that it is unlikely more than one or two large South Island projects would ultimately secure project finance and be constructed. However, this commentary appears to be based on a range of hypothetical market scenarios rather than hard or physical development constraints, such as transmission connection capacity limits. As a result, these potential constraints are considered to be quite uncertain and therefore have not been relied on upon in forming our comments.

- 3.32. Given the differing information provided by Far North Solar Farm and Lodestone Energy, and in the absence of clear and specific confirmation from Transpower regarding connection capacity within the existing transmission infrastructure, uncertainty remains as to the extent to which transmission constraints may influence the ability for multiple solar farm projects (including future projects) to proceed under the FTAA or through RMA consenting processes.

Projects National and Regional benefits

- 3.33. The Haldon Solar Farm Project is expected to deliver regionally and nationally significant infrastructure by supplying electricity to approximately 45,000 households annually. Further, the economic assessment prepared by ME consulting anticipates that approximately 235-242 direct jobs, 290-291 indirect jobs and 219-220 induced jobs will be created during the construction phase of the project, while approximately 5-6 direct jobs will be sustained during the operational phase, due to ongoing maintenance and monitoring activities. Further, the overall value added by the proposal is estimated to be at least \$134 million.
- 3.34. However, as noted above Te Rūnanga is concerned that the existing transmission network may lack sufficient capacity to accommodate Haldon Solar Farm alongside other large-scale solar projects currently proposed in Te Manahuna.
- 3.35. As a result, uncertainty remains in terms of the projects ability to deliver the anticipated infrastructure and economic benefits and from a broader perspective, the practical feasibility of establishing multiple solar farms in Te Manahuna. These matters are closely linked to Te Rūnanga concerns about cumulative effects, as constraints on the transmission network may directly influence which projects are able to be built and consequently, what overall pattern, scale and sequencing of development might be realistically achievable in the area.

4. Additional information Sought

- 4.1. Based on the above comments, Te Rūnanga considers that the following additional information would assist to better understand the potential impacts on identified settlement matters and in some instances would help to clarify or narrow outstanding issues of concern.
- 4.2. At the outset, Te Rūnanga considers that Transpower (as the owner and operator of the electricity network) needs to confirm what capacity exists for new solar projects to connect to the existing transmission infrastructure, taking into account the scale of these projects. Without this information, uncertainty remains as to whether the project can be built along with the Point solar project. As such, Te Rūnanga considers that information from Transpower should be addressed as a matter of priority, and that the scope and timing of the other requested information, (including any assessment of cumulative effects), should be considered once this information has been obtained.
- 4.3. **Transmission capacity and connection feasibility (Transpower)**
- 4.4. The following information is requested from Transpower:
- Confirmation of available capacity within the existing transmission network for Haldon Solar Farm to connect alongside the Point Solar Farm and any other anticipated solar farm projects in Te Manahuna.

- Details on Transpower's connection process for large-scale infrastructure, including whether there is a queue or prioritisation system that could result in some projects progressing ahead of others.
- Identification of any network upgrades required to support all anticipated projects, including expected timing and likelihood of delivery.

4.5. **Additional information (Lodestone Energy)**

4.6. The following information is requested from Lodestone Energy:

Cumulative effects assessment

4.7. An integrated assessment of the cumulative effects that could arise if the substantive application is granted in combination the Point Solar Farm and existing electricity infrastructure. Focus on potential effects on:

- Ecological values and taonga species.
- Stormwater, flooding, and groundwater including effects on Te Ao Mārama catchment.
- Landscape and visual values.

Note: it is understood that the Expert Panel has invited comment from Far North Solar Farm on cumulative effects and that the applicant will also be provided with a similar opportunity when the Expert Panel invites comments on Far North Solar Farms project. If the Expert Panel is of the view that this additional information should be staged or addressed at later point, Te Rūnanga seeks the opportunity to review and comment on any additional information once it becomes available.

Ecological assessment and taonga species

- 4.8. Further avifauna assessments with a focus on the southern end of the project site (near the lake).
- 4.9. Identification and confirmation of taonga species that may be present at the site and surrounding area, taking guidance from Schedules 97 and 98 of NTCSA.
- 4.10. Consideration of potential impacts from sediment, stormwater run-off, vegetation clearance (where applicable) and operational activities on these species and habitats.

Stormwater and erosion management

- 4.11. Additional information on site-specific stormwater generation, including potential effects of elevated groundwater levels, flood events, or extreme rainfall on surface runoff and associated risks to Te Ao Mārama.
- 4.12. Assessment of proposed mitigation measures, including erosion and sediment control, dust management, and stormwater management plans, considering recent observations of elevated water levels in the surrounding environment.

Landscape and visual assessment

- 4.13. If available, provision of further visualisations and modelling to better understand potential cumulative landscape and visual effects, including in combination with other proposed solar farm projects.

5. Engagement with Lodestone Energy and Proposed Mechanisms

- 5.1. As an aside to the above comments, Te Rūnanga and mana whenua have engaged constructively with the Lodestone Energy since attending the Panel Conveners Conference in October 2025. The full details of engagement undertaken between all parties to date are set out in the comments made by Aoraki Environmental Consultancy (on behalf of Te Rūnanga o Arowhenua) and are confirmed to include a site visit, various email correspondence (including discussions) and an in-person meeting.
- 5.2. This engagement has allowed mana whenua and Te Rūnanga to gain a better understanding of the key project components, and to begin to have open discussions regarding mana whenua associations with the site, perspectives on the project and intergenerational aspirations for Te Manahuna.
- 5.3. During the most recent engagement, Lodestone Energy expressed a commitment to build a meaningful and enduring relationship with mana whenua. This commitment is understood to extend beyond minimising potential adverse cultural effects (should the required consents be granted) to actively contributing to mana-enhancing outcomes for current and future Ngāi Tahu Whānui, given the immense cultural significance of Te Manahuna.
- 5.4. While Lodestone Energy and mana whenua are continuing to formalise a relationship outside of the consenting process, Te Rūnanga considers it important that mechanisms to manage and avoid, remedy, or mitigate potential adverse cultural effects be secured through the consent conditions (should consent be granted). Based on the recent engagement, it is requested that Lodestone Energy amends its volunteered Kaitiaki Working Group conditions (contained in the proposed conditions for consents required from Mackenzie District Council) to provide for the establishment of a Kaitiaki Governance Group (KGG).
- 5.5. The KGG is intended to:
 - Enable mana whenua to engage at a mana-to-mana level with Lodestone Energy throughout the project's life;
 - Provide ongoing oversight and opportunities for advice; and
 - Ensure cultural values are actively considered in day-to-day operations and long-term project outcomes.
- 5.6. Te Rūnanga also requests consent conditions that require the establishment and implementation of a Cultural Monitoring Programme (CMP) in collaboration with mana whenua. The CMP is intended to:
 - Provide a framework for mana whenua involvement in monitoring and assessing cultural and environmental effects of the Solar Farm (informed by mātauranga Māori and kaitiaki responsibilities).
 - It is also intended that monitoring outcomes will meaningfully inform measures to avoid, remedy, or mitigate any identified adverse effects over the life of the project.

5.7. Te Rūnanga and mana whenua would welcome the opportunity to further discuss with Lodestone Energy the substance and practical operation of the proposed conditions, given the recent and evolving nature of these discussions.

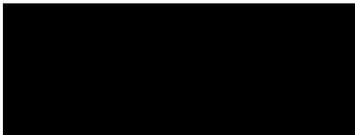
6. Decision Sought & Closing

6.1. Te Rūnanga thanks the Expert Panel for the opportunity to comment on the Haldon Solar Project substantive application.

6.2. Te Rūnanga holds a neutral position on the substantive application, on the understanding that Lodestone Energy is committed to building a meaningful and enduring relationship with mana whenua. As such, it is anticipated that Lodestone Energy will continue to work with mana whenua and Te Rūnanga to appropriately respond to and where possible, address the matters set out in the separate comments.

6.3. Te Rūnanga therefore welcomes the opportunity to continue engaging with Lodestone Energy to address the matters raised, including through the provision of further information and the development of consent conditions to enable ongoing mana whenua involvement in the project operations and protection and enhancement of cultural values, should consent be granted.

Nuku noa nā,



Maru Rout

Programme Leader, Mauri, Te Rūnanga o Ngāi Tahu

Address for Service:
Amy Beran
Te Rūnanga o Ngāi Tahu



Appendices:

- Appendix One – Map of takiwā of Ngāi Tahu
- Appendix Two – Crown Apology to Ngāi Tahu
- Appendix Three- Statutory Acknowledgement- Hakataramea River
- Appendix Four- Taonga Species Schedule
- Appendix Five- Cumulative effects- Table of Solar Farm Projects
- Appendix Six- Regional Transmission Capacity Summary, Lodestone Energy