

## **Addendum 7 - Mana Whenua**

### **1. Introduction and Purpose**

Lodestone welcomes the opportunity to reflect on the engagement undertaken to date with mana whenua in relation to the Haldon Solar Farm development. We greatly value the time, knowledge and perspectives shared through these engagements. We appreciate the open, constructive and respectful discussions held with Te Rūnanga o Ngāi Tahu and its rūnanga representatives. Lodestone remains committed to ongoing, positive engagement with mana whenua, grounded in good faith, mutual understanding and a willingness to listen and respond as the project continues to develop.

This addendum provides a high level overview of engagement with mana whenua to date relating to the Haldon Solar Farm development. It also provides context around comments raised by Te Rūnanga o Ngāi Tahu, Aukaha (representing Te Rūnanga o Moeraki and Te Rūnanga o Waihao) and AECL (representing) Te Runanga o Arowhenua in relation to the Haldon Solar Fast-track application.

### **2. Recent Engagements**

Following the convenor conference, a Scope of Works contract was initiated between Lodestone and mana whenua to facilitate Ngāi Tahu and Rūnanga to participate in the Fast-track process for Haldon Solar.

#### **2.1 November 19, 2025 - On-site Hui**

The Haldon Solar Hui, held on 19 November 2025 at Haldon Station, brought together Lodestone Energy, Ngāi Tahu Papatipu Rūnanga (Moeraki, Waihao, and Arowhenua), and Haldon Station representatives to review the proposed Haldon solar farm and strengthen relationships. The hui focused on open engagement, building shared understanding of the project area, and listening to Rūnanga perspectives on cultural values, historical and current land use, nohoanga, and mahinga kai. The day included karakia and shared kai, a presentation of the project's digital twin, site visits across the proposed solar area, and on-site kōrero while travelling together, concluding with agreement on next steps.

#### **2.2 January 21, 2026 - Ngai Tahu Offices**

A further hui was held on 21 January 2026 between Lodestone Energy, Ngāi Tahu and rūnanga representatives at Ngāi Tahu's Christchurch offices focused on progressing matters arising from the Haldon site visit and subsequent internal mana whenua discussions. Ngāi Tahu noted that engagement with Lodestone to date had been positive and emphasised the importance of trust and a developer capable of sustaining a long-term relationship. Key discussion topics included the need for a long-term engagement framework extending beyond the consenting phase, consideration of cultural effects and ongoing connection to whenua, and potential cultural responses such as pou installation and the development of a jointly owned Cultural Monitoring Plan. Broader opportunities were also discussed, including employment and capability-building for whānau and "mahi energy" as a pathway to reconnect whānau with the region.

Next steps focused on maintaining momentum and providing clarity on process. Following the meeting, Lodestone provided additional detail including transmission capacity context and example framework/memorandum documentation to support discussion on a long-term relationship model. Further work will explore a Haldon-specific framework agreement and the outline of a Cultural Monitoring Plan to underpin ongoing governance and engagement, with all parties agreeing to continue discussions in good faith.

Consent conditions recommended by Te Rūnanga o Ngāi Tahu that respond to the development of a Kaitiaki Governance Group and provide for the development of a Cultural Monitoring Plan have been developed and incorporated into the latest proposed condition set.

### **3. Responses to Comments**

#### **3.1 Overview of Submissions and Lodestone's Response**

Across submissions from Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd), Te Rūnanga o Moeraki, Te Rūnanga o Waihao (via Aukaha Limited) and Te Rūnanga o Ngāi Tahu raised a range of matters relating to governance, cultural values, access to culturally significant places, ecological effects, cumulative impacts, and project management risks. Lodestone has carefully considered these matters and responded through refinements to the application, the preparation of addenda, and the strengthening of proposed consent conditions.

#### **3.2 Governance and Ongoing Mana Whenua Involvement**

A consistent theme across submissions was the need for enduring governance and meaningful involvement of mana whenua over the life of the project, rather than only during the consenting phase. Mana whenua sought formal mechanisms to provide oversight and guidance on cultural and environmental matters, including the establishment of a Kaitiaki Governance Group and a Cultural Monitoring Programme. Lodestone has responded by incorporating consent conditions recommended by Te Rūnanga o Ngāi Tahu into the updated condition set, providing for the establishment of a Kaitiaki Governance Group and the development and implementation of a Cultural Monitoring Programme to oversee cultural and ecological effects and guide mitigation and enhancement over time.

#### **3.3 Cultural Landscape Values and Sensitivity of Te Ao Mārama**

Concerns were also raised that development at the edge of Te Ao Mārama / Lake Benmore could further alienate Kāi Tahu from the wider Te Manahuna cultural landscape, given its deep whakapapa associations and cultural importance. Lodestone acknowledges the profound cultural sensitivity of the area and has committed to mitigation and mana-enhancing measures that can be addressed by the Kaitiaki Governance Group and the Cultural Monitoring Programme framework. Such measures include meaningful iwi involvement, restoration investment, and enduring cultural safeguards, to avoid further disconnection from the landscape.

#### **3.4 Access to Culturally Significant Areas and Mahika Kai**

Mana whenua sought assurance that continued access to Te Ao Mārama would be protected, particularly for customary mahika kai activities such as raupō harvest. Lodestone and Haldon Station confirm that ongoing customary access to the lakeshore will be maintained for all relevant parties for the duration of the project, subject to agreed health and safety protocols. Lodestone also confirms that the project layout avoids the lakeshore and incorporates setbacks designed to protect lake-edge cultural and ecological values.

### **3.5 Nohoanga Entitlements and Cultural Use**

Te Rūnanga o Ngāi Tahu further raised concerns regarding the nearby Haldon Arm nohoanga entitlement, noting that effects extend beyond physical access to include the ability to use the nohoanga as a base for mahika kai and cultural engagement, and that large infrastructure can impose indirect restrictions that diminish cultural identity and sense of place. Lodestone commits to working with mana whenua through the Kaitiaki Governance Group to ensure that construction and operation of the solar farm do not interfere with iwi access to, enjoyment of, or cultural use of the nohoanga site and the wider landscape.

### **3.6 Statutory Acknowledgement Sites and Cultural Assessment**

Mana whenua also questioned whether the application adequately assessed cultural values associated with Sites and Areas of Significance to Māori (SASM), relevant objectives and policies, and broader strategic direction provisions, noting that reliance on accidental discovery protocols alone was insufficient. Lodestone acknowledges that accidental discovery protocols are necessary but not sufficient mitigation on their own and has committed to further cultural assessment with iwi input through the development of the Cultural Monitoring Programme, including assessment of SASM cultural landscape values and appropriate mitigation and enhancement measures.

### **3.7 Ecological Effects and Biodiversity Management**

A number of ecology-specific concerns were raised, including the adequacy of baseline ecological assessment, potential effects on taonga species (particularly avifauna and aquatic species), sediment and stormwater effects, and the absence of clear restoration or biodiversity “give-back” measures. In response, Lodestone has prepared Addendum 3, which specifically addresses ecology-related comments. Addendum 3 provides further assessment of ecological effects, refines mitigation measures, and clarifies monitoring and management commitments to ensure effects on ecological values are appropriately managed over the life of the project.

### **3.8 Ecological Restoration, Pest Management, and Enhancement Opportunities**

Mana whenua also sought opportunities for ecological restoration and enhancement, including extension of existing wetland restoration initiatives near Haldon Arm. Lodestone acknowledges and supports this request and proposes that continuation of Haldon Wetland restoration be incorporated as a key component of the Cultural Monitoring Programme, aligned with mana whenua aspirations and contributing positively to the cultural and ecological health of Te Ao Mārama and the surrounding landscape. Concerns regarding rabbit management were also raised; Lodestone confirms pest control will be undertaken within the project footprint, while broader rabbit management remains the responsibility of the landowner and is expected to be supported by project lease revenue.

### **3.9 Stormwater, Flooding, and Contaminant Management**

Further concerns were raised regarding stormwater, flooding and contaminants, including potential runoff, erosion, and the risk of contaminants entering Te Ao Mārama, particularly in light of high lake levels and flooding experienced in January 2026. Lodestone acknowledges these concerns and confirms its commitment to ensuring no contaminated stormwater runoff from the site during construction or operation. These commitments are embedded in consent conditions requiring construction and operational stormwater management plans, developed in consultation with Environment Canterbury. Flood hazards have been assessed for events exceeding the January 2026 event, including future climate resilience scenarios, and stormwater design will ensure no adverse effects on the nohoanga site, campground, or lake catchment.

Meridian also provided comment about hydro inundation events and Lodestone has refined consent conditions to ensure engagement with Meridian on this matter.

### **3.10 Hazardous Substances Management**

Te Rūnanga o Arowhenua also sought clarification on hazardous substances and whether the project could trigger “hazardous facility” status. Lodestone confirms that hazardous substances stored onsite will be minimal and managed within regulatory thresholds. The principal hazardous substance is transformer mineral oil associated with the main substation transformers, which will be banded on an impermeable base to contain at least 120% of oil volume, supported by oil-water separation, spill response procedures, and emergency management controls. Some uncertainty remains as to whether any parts of the proposal constitute a “hazardous facility” as that term is not defined in the District Plan. Planning evidence provided by Lodestone’s planning consultants confirms that this uncertainty is of no consequence to the assessment required by the Panel.

### **3.11 Fire Risk and Emergency Response**

Concerns were also raised regarding fire risk and emergency response, given the site’s remote location. Lodestone confirms that an Emergency Management Plan will be prepared prior to construction, in consultation with Fire and Emergency New Zealand, with their approval required.

### **3.12 Cumulative Effects and Landscape Change**

Mana whenua raised cumulative effects concerns, particularly the combined effects of multiple solar proposals in Te Manahuna alongside existing hydroelectric and transmission infrastructure, and the potential for incremental industrialisation of the landscape. In response, Lodestone has commissioned Boffa Miskell to undertake a cumulative landscape and visual impact assessment and has prepared Addendum 6, which provides additional analysis of cumulative effects, including landscape and visual effects, ecology, and transmission context.

### **3.13 Economic Benefits and Local Employment**

Mana whenua raised concerns that economic benefits and employment opportunities may be short-term and not flow locally. Lodestone acknowledges these concerns and will explore opportunities for local procurement, workforce training and iwi employment pathways where feasible, noting Lodestone’s experience on comparable projects where up to 50% of labour has been sourced locally, while recognising that some specialist roles may need to be filled from the wider region.

### **3.14 Landscape Effects**

The existing embankment vegetation forms part of the current receiving environment and provides contextual screening, but it is not relied upon as enforceable mitigation. The assessment of visual effects has been undertaken on the basis that this vegetation may change over time, and effects are assessed as low due to distance, landform, viewing angle, and the transient nature of public viewpoints, independent of its continued presence. Boffa Miskell has completed a comprehensive landscape and visual assessment, which looked at viewpoints described and found the effects to be minimal and manageable resulting in an assessment of less than minor.

### **3.15 Broader Comments**

Finally, Lodestone acknowledge broader comments from Environment Canterbury and the Minister for Māori Development, both of whom deferred to mana whenua on cultural matters and emphasised the importance of recognising statutory acknowledgements for Te Ao Mārama. Lodestone confirmed that it will continue engagement with relevant iwi and that statutory acknowledgements and cultural matters are recognised and addressed within the application and assessment framework.

## **4. Summary**

Lodestone values the relationships established with Te Rūnanga o Arowhenua, Te Rūnanga o Moeraki, Te Rūnanga o Waihao and Te Rūnanga o Ngāi Tahu and remains committed to working in partnership with mana whenua in good faith over the life of the Haldon Solar Farm. Matters raised by mana whenua have directly informed the refinement of the application, the preparation of Addendum 3 (Ecology) and Addendum 6 (Cumulative Effects), and the strengthening of consent conditions to provide for enduring governance, cultural and ecological monitoring, and adaptive management. Through the establishment of a Kaitiaki Governance Group, implementation of a Cultural Monitoring Programme, and ongoing engagement during construction and operation, Lodestone is committed to ensuring that cultural values, ecological outcomes, and customary practices associated with Te Ao Mārama and Te Manahuna are respected, protected and, where appropriate, enhanced.