

23 February 2026

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Fast Track Approvals
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Tēnā koe

FTAA-2508-1097 – HALDON SOLAR – LODESTONE ENERGY LIMITED

Te Rūnanga o Arowhenua (Arowhenua), Te Rūnanga o Waihao (Waihao), Te Rūnanga o Moeraki (Moeraki) and their Regional Environmental Entities Aoraki Environmental Consultancy Limited (AECL) and Aukaha thanks you for the opportunity to provide further comment on the Lodestone Energy Limited solar farm proposal (Haldon Solar) under the Fast Track Approvals Act 2024 (FTAA). This reply refers to the information requested in your letter dated 13 February 2026. The matters set out in your letter are addressed in turn below.

Can Rūnanga verify how and when they have met with Lodestone Energy Limited over the last 12 months?

AECL and Aukaha staff along with representatives from Arowhenua, Waihao and Moeraki have met with Lodestone Energy Limited on the following dates:

Date	Purpose
10/10/2024	Two AECL Cultural Consultants attended a site visit along with representatives from Lodestone Energy Limited to visualise the site and ascertain more information about where the proposed solar farm was to be located.
23/10/2025	An online meeting with Lodestone Energy, Aukaha and AECL representatives for 30 minutes to introduce each other and inform Lodestone Energy who from Aukaha and AECL will be assisting in the Fast Track Application process.
03/11/2025	Convenor Conference (online).
19/11/2025	A site visit to the project site along with representatives from Te Rūnanga o Ngāi Tahu (TRoNT), AECL, Aukaha, Arowhenua, Moeraki, Lodestone Energy Limited and the landowner.
21/01/2026	A face-to-face/manā-to-manā meeting was held at TRoNT Office in Christchurch along with representatives from TRoNT, AECL, Aukaha, Arowhenua, Waihao, Moeraki along with Lodestone Energy Limited.

Can Rūnaka or their Environmental Entities please clarify what discussions were held if one or more meetings were held?

The Kaitiaki Forum condition was not discussed with Arowhenua, Waihao or Moeraki Rūnaka or the Environmental Entities prior to its inclusion (as a volunteered condition of consent) in Lodestone Energy Limited's substantive application.

However, the broader issue of Rūnaka involvement in the project was discussed at a face-to-face meeting with Lodestone Energy Limited on 21 January 2026. At that meeting, mana whenua expressed the need to establish an enduring relationship with Lodestone Energy Limited, given the immense cultural significance of Te Manahuna to Kāi Tahu. It was made clear that such a relationship should enable mana whenua to actively exercise rangatiratanga and kaitiakitanga¹ throughout the life of project, not only at the approval stage or through limited advisory input.

In discussing mechanisms to support this relationship, Rūnaka proposed the establishment of a governance-level group to provide for ongoing engagement and involvement at a mana-to-mana level with Lodestone Energy Limited. Following the face-to-face meeting, and through the comments made on the substantive application, Arowhenua, Waihao and Moeraki Rūnaka and Te Rūnanga o Ngāi Tahu (TRoNT) staff advanced the concept of a Kaitiaki Governance Group (KGG) to replace the proposed Kaitiaki Forum.

The proposed KGG is considered a more appropriate mechanism for a project of this nature and scale. It is intended to provide structured, ongoing governance engagement rather than a narrower forum model with potentially limited scope and influence on decision-making. While the detailed wording of a KGG condition remains subject to agreement, preliminary draft wording was shared directly with Lodestone Energy Limited to enable collaborative refinement of an agreed governance framework.

In addition to the proposed KGG, mana whenua outlined the need for a specific management framework to allow for a “Kāi Tahu lens” to be applied across the project management responses, in a bid to ensure that cultural effects are appropriately identified, monitored and addressed over the life of the project. This discussion evolved into the concept of a Cultural Management Plan/Programme (CMP), which is intended to provide a structured process for cultural matauranga māori monitoring, reporting, and responding to cultural effects throughout the life of the project (i.e., from pre-construction through to decommissioning). The CMP is intended to support an adaptive management approach, should monitoring identify the need for a change in response measures or additional mitigation.

Since submitting comments on the substantive application (as enabled under s53 of the FTAA) and providing the preliminary draft wording, Lodestone Energy Limited has responded by incorporating the draft condition wording into its revised Mackenzie District Council consent conditions, issued as part of Lodestone Energy Limited’s response to the comments received on the substantive application. For ease of reference, an extract from the revised consent conditions is attached to this letter.

It is anticipated that further discussion and refinement of both the KGG and CMP conditions will occur at a forthcoming face-to-face meeting scheduled for Wednesday 4 March 2026, in Christchurch at the TRoNT office. Attendees are expected to include representatives of the three Rūnaka, AECL, Aukaha, TRoNT, and Lodestone Energy Limited. While a draft agenda is currently being prepared, it is broadly understood that the meeting will focus on advancing the KGG and CMP conditions and addressing key matters raised in the comments made on the substantive application.

What is the response of Rūnaka to the concept of a Kaitiaki Forum and on the current proposed scope of the Forum?

Yes. Rūnaka considers that further input is essential. As outlined above, mana whenua seeks governance-level involvement through the proposed Kaitiaki Governance Group and ongoing input into the development, administration, and operation of both the KGG and the CMP to ensure they are effective and appropriately reflect Kāi Tahu and mana whenua values and responsibilities.

Does the Rūnaka and Environmental Entities wish to have further input into how the proposed Kaitiaki Forum will be established and administered?

¹ Referred to as rakatirataka and kaitiakitaka in the southern dialect.

Arowhenua, Waihao and Moeraki through AECL and Aukaha confirm that they would like to have further input into the following aspects:

1. The wording and objectives of the KGG and the CMP consent conditions to ensure that ongoing engagement and mātauranga māori opportunities occur in the future, and that feedback opportunities are appropriate and timely for all parties.
2. How a proposed KGG and CMP will be established and the role(s) mana whenua will have, and
3. How the KGG and CMP will be administered, including how Rūnaka members will be reimbursed for their time and work.

Rūnaka, the Environmental Entities, and TRoNT staff feel the engagement with Lodestone Energy Limited has been positive since the substantive application was lodged, and hope this constructive engagement continues.

Please contact AECL's Principal Planner, Kylie Hall by phone on [REDACTED] or by email [REDACTED] if you have any questions or require further clarification from AECL. Please contact Aukaha's Senior Planner, Tim Vial by phone on [REDACTED] or by email to [REDACTED] if you have any questions or require further clarification from Aukaha.

Kā mihi,



Ally Crane
General Manager
Aoraki Environmental Consultancy Limited



Cory Neale
Chief Executive
Aukaha



Draft Proposed Consent Conditions

Condition Number	Proposed Conditions	Comment
Kaitiaki Governance Group		
5.	At least three months prior to the commencement of construction works, the Consent Holder must establish a Kaitiaki Governance Group ("KGG") in relation to the solar farm.	Te Rūnanga o Ngāi Tahu and Te Rūnanga o Arowhenua have suggested changes to the form and functioning of the Kaitiaki Governance Group.
5A	<p>The KGG must comprise three representatives from the Consent Holder and three representatives nominated by:</p> <ul style="list-style-type: none"> a) Te Rūnanga o Arowhenua; b) Te Rūnanga o Waihao; and c) Te Rūnanga o Moeraki. <p>When and if required, representatives from the Canterbury Regional Council, Mackenzie District Council, and/or the Department of Conservation, may be invited to attend KGG meetings by agreement of the KGG.</p>	
5B	<p>The purpose of the KGG includes, but is not limited to:</p> <ul style="list-style-type: none"> a) Facilitating ongoing engagement and communication between the Consent Holder and Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki as mana whenua; b) Supporting and overseeing the implementation of the Cultural Monitoring Programme as described in Condition 5G below; c) Enabling discussions between the Consent Holder and mana whenua on the effectiveness of the measures implemented by the Consent Holder to avoid, 	

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	<p>remedy, or mitigate adverse effects on cultural values associated with the whenua and wai;</p> <ul style="list-style-type: none"> d) Where agreed by Mana whenua, facilitating their input where required by the conditions of this consent; e) Providing advice on monitoring results, including remedial actions where monitoring indicates a decline in the cultural health as a result of the solar farm operations; f) Providing mana whenua with reports, monitoring information and project updates; g) Providing for access to the site for purposes of mahika kai harvest; and h) Providing a forum through which mana whenua may offer advice on optional initiatives that respond to the cultural and historical context of the site and surrounding environment. <p><i>Note: Optional initiatives may include, but are not limited to, interpretive signage, pouwhenua, and/or artworks in locations agreed between the Consent Holder and mana whenua.</i></p>	
5C	<p>The KGG must:</p> <ul style="list-style-type: none"> a) Meet on a quarterly basis, unless otherwise agreed by all parties that a meeting is not required; b) Hold, at a minimum, at least one meeting in each calendar year; and c) Continue to operate for the duration of the project, unless otherwise agreed in writing by the KGG members. 	

Condition Number	Proposed Conditions	Comment
	The first meeting of the KGG must be held at least twenty working days prior to the commencement of physical works on site.	
5D	<p>The Consent Holder must:</p> <ul style="list-style-type: none"> a) provide the KGG with up-to-date information relevant to the design, construction, operation, and decommissioning of the Solar Farm; b) seek advice from the KGG on the draft management plans required by the conditions of this consent, at least twenty working days prior to their submission for certification; and c) incorporate any advice provided by the KGG (including advice from Aoraki Environmental Consultancy and/or Aukaha) into the draft management plans by making amendments in response to that advice. 	
5E	The Consent Holder must provide resourcing commensurate to the needs of the KGG for the duration of the solar farm. This includes but is not limited to resourcing of technical support from Aoraki Environmental Consultancy (AEC) and Aukaha to enable each Papatipu Rūnanga to participate in accordance with the requirements of these conditions.	
5F	The Consent Holder must maintain a record of matters raised through the KGG and the Consent Holder's response to those matters, including monitoring results and any remedial actions undertaken in response to the monitoring results	

Condition Number	Proposed Conditions	Comment
Cultural Monitoring Programme		
5G	<p>The Consent Holder must establish and implement a Cultural Monitoring Programme in collaboration with mana whenua within and around the Site from the commencement of this consent. The Cultural Monitoring Programme must operate for the duration of the Solar Farm.</p> <p>The purpose of the Cultural Monitoring Programme is to:</p> <ul style="list-style-type: none"> a) Establish a framework for monitoring cultural values and indicators of environmental health within and around the Site prior to and during operation of the Solar Farm; b) Enable ongoing monitoring of these values and indicators, including areas potentially affected by sediment, runoff, or other effects of the activity; and c) Identify and implement remedial actions where monitoring indicates a decline in cultural health or integrity attributable to the Solar Farm. 	
5H	<p>As part of the Cultural Monitoring Programme framework, the Consent Holder must collaborate with mana whenua to:</p> <ul style="list-style-type: none"> a) Establish the specific monitoring methodology, including the indicators to be measured, the approach for data collection, and frequency of monitoring; and b) Ensure that the methodology allows for the identification of changes in cultural and environmental values that may require remedial or mitigation action. 	

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5I	<p>The Consent Holder must provide the opportunity for mana whenua to lead baseline and ongoing cultural monitoring in accordance with the agreed methodology. The Consent Holder must also:</p> <ul style="list-style-type: none"> a) Commission all baseline and ongoing monitoring required under the Cultural Monitoring Programme in accordance with the established methodology; b) Ensure that the results of all monitoring are documented in a Cultural Monitoring Report; and c) Provide the report to the KGG, including summaries, trends, and any remedial actions taken. 	
5J	<p>Compliance with the Cultural Monitoring Programme conditions must be demonstrated through the annual compliance monitoring report. The report must:</p> <ul style="list-style-type: none"> a) Summarise monitoring undertaken in accordance with the Cultural Monitoring Programme; b) Document any remedial actions implemented; and c) Include written confirmation from mana whenua, or their authorised representative, stating that the monitoring requirements of this condition have been met. 	