



17 April 2026

Fast Track Applications
Environmental Protection Authority
Private Bag 63002
WELLINGTON 6140

[delivered to: info@fasttrack.govt.nz]

Tēnā koe June

FTAA-2509-1100 – FAR NORTH SOLAR FARM – THE POINT SOLAR FARM AND FTAA-2508-1097- HALDON SOLAR FARM

Thank you for your letter dated 2 April 2026 requesting further information as directed by the Haldon Solar Expert Panel and the Point Solar Farm Expert Panel (**the Expert Panels**).

It is understood that the Environmental Protection Authority (EPA) is seeking clarification on whether further engagement has occurred with Lodestone Energy Limited (Lodestone Energy) and Far North Solar Farm Limited (Far North Solar Farm) (**the Applicants**).

This letter provides a joint response to the Panels on behalf of mana whenua, Te Rūnanga o Ngāi Tahu, Aoraki Environmental Consultancy Limited (AECL), and Aukaha.

Background: Hui with Far North Solar Farm and Lodestone Energy Limited, 31 March 2026

Consistent with previous in-person engagement, mana whenua, Te Rūnanga o Ngāi Tahu, and AECL met separately with the Applicants at Te Whare o Te Waipounamu, Ōtautahi, on 31 March 2026.

Each hui provided an opportunity for the applicants to present an overview of the work being undertaken in response to the Expert Panels' requests for further information (RFIs). The ecological and avifauna investigations, including preliminary findings and the development of ecological management frameworks and associated project outcomes, were a particular focus of the hui.

The hui also enabled mana whenua to engage directly with each applicant's experts (including ecologists and avifauna specialists), seek clarification on methodologies and findings to date, and provide feedback on matters of particular interest.

For the Haldon Solar Farm, discussions included opportunities for mana whenua to be involved in propagation and subsequent introduction of rare plant species at the site, pest control work, and on-site avifauna monitoring (including bird movements, behaviour, and bird strike events).

For the Point Solar Farm, discussion focused primarily on avifauna monitoring methodologies, particularly bird strike detection and carcass recovery processes.

The second part of each hui involved open discussion between the applicants' planners, mana whenua, and planning representatives for AECL and Te Rūnanga o Ngāi Tahu on the draft revised consent conditions dated 25 March 2026. This included further refinement of the mana whenua-specific conditions previously provided to both applicants as part of earlier discussions.

By way of background, mana whenua had initially sought the inclusion of both a Kaitiaki Governance Group and a Cultural Monitoring Programme. Through ongoing engagement and a developing understanding of each project, this approach has evolved.

Mana whenua now considers that a broader, integrated work programme, implemented through an enduring relationship with each applicant and facilitated by a Kaitiaki Governance Group, better aligns with their expectations than a standalone monitoring programme.

It is intended that this work programme will provide a framework for initiatives advanced through the Kaitiaki Governance Group, including (but not limited to) specific projects and cultural outcomes identified by mana whenua.

Further details about the changes made to the mana whenua-specific consent conditions to better align with mana whenua expectations are outlined in the responses below.

Questions Raised by the Expert Panels and Responses

1. Your feedback on whether there has been agreement in principle on mana whenua expectations with Lodestone Energy Limited and Far North Solar Farm Limited respectively on their applications to establish solar farms in Te Manahuna (Mackenzie Basin).

Ongoing Relationship expectation

As outlined in previous correspondence to the Expert Panels, mana whenua have consistently sought to establish an enduring relationship with both applicants for the life of each solar farm project, given the cultural significance of Te Manahuna to Kāi Tahu.

Such a relationship is considered essential to enable mana whenua to actively exercise rakatirataka and kaitiakitaka within Te Manahuna throughout the life of each project (not only at the approval stage or through limited advisory input).

While the specific mechanisms to give effect to this relationship (primarily through consent conditions and related agreements outside of the approvals process) have continued to evolve alongside each application, it is understood that in principle, both Lodestone Energy and Far North Solar Farm are committed to establishing an enduring relationship. This is intended to enable mana whenua to have an ongoing role in project implementation, including influencing decision-making where activities may impact mana whenua values.

Although mana whenua have not been provided an opportunity to review further iterations of the draft consent conditions following the 31 March 2026 hui, the following information was provided to both applicants to inform ongoing refinement ahead of the 21 April 2026 deadline¹:

- Updated draft wording for both a Kaitiaki Governance Group and a Strategic Cultural Programme (Work Programme);
- Feedback on the revised consent condition set dated 25 March 2026, including requested amendments and additional conditions (noting that mana whenua has sought a 35-year consent duration for the land use consent required from Mackenzie District Council); and
- Meeting notes recording the key matters discussed at the hui with each applicant.

¹ That a final set of conditions needs to be submitted to the Expert Panels for both solar farm projects.

For completeness, copies of these documents are contained in **Appendix 1** of this letter.

Holistic understanding of environmental effects and management

As discussed further below, the concerns identified by mana whenua (through comments on each substantive application and ongoing engagement with both Applicants) are inherently interconnected. This reflects a Kāi Tahu worldview, in which the wellbeing of the environment is intrinsically linked to the wellbeing of the people. Mana whenua do not see themselves as separate from the environment.

Accordingly, engagement with both applicants has taken a holistic approach, recognising that mana whenua concerns are not narrow in scope and reflect an intergenerational perspective.

However, the gaps in the original applications have resulted in an ongoing “backfilling” process, whereby further detail on potential environmental effects and proposed management has been progressively provided. This incremental approach to the provision of information on the environmental effects of each project has proved challenging for mana whenua.

At the same time, consent conditions have continued to be refined in parallel. This has created a level of uncertainty as to the final form and content of those conditions, given the supporting information base is still evolving. Based on the most recent engagement with both applicants, it is understood that site specific consent matters (including ecological matters) have largely been put aside due to these information gaps.

As a result, mana whenua have been unable to form a comprehensive and informed view on the proposals. This is particularly challenging when applying a Kāi Tahu lens, which requires a comprehensive and holistic understanding of interconnected effects – ki uta ki tai.

Mana whenua therefore remain concerned that their ability to reach a position that aligns with their values and worldview is being undermined by the current level of uncertainty regarding the supporting information and conditions.

2. Your views on whether there are any outstanding issues that remain unresolved

As noted above, the establishment of an enduring relationship that enables mana whenua to have an ongoing role throughout the life of each solar farm is of central importance. The specific mechanisms to give effect to this relationship are, however, still subject to finalisation.

Notwithstanding, mana whenua considers that the draft wording for the mana whenua-specific consent conditions (including the Kaitiaki Governance Group and Strategic Cultural Programme/Work Programme) have reached a form that addresses their core expectations. It is also noted that discussions outside of the fast-track approvals process are ongoing in relation to establishing a broader relationship agreement with each applicant.

In terms of project-specific matters, mana whenua have raised similar concerns across both solar farm proposals. These concerns broadly relate to ecological effects (including impacts on taoka species and customary activities) and landscape effects (including impacts on cultural connections across the landscape and the ability to engage with it).

Given the interconnected nature of these concerns, mana whenua supports, in principle, the approach taken by Lodestone Energy in developing an overarching ecological management framework. While this framework remains under development, it is expected to clearly articulate the ecological outcomes sought and the integrated suite of responses proposed to achieve those outcomes. In doing so, it should more

comprehensively address ecological concerns and better align with a holistic Kāi Tahu view of the natural environment.

For Far North Solar Farm Limited, concerns remain regarding the current trajectory of the response to outstanding RFI matters, and whether this will sufficiently enable mana whenua to understand the environmental effects and proposed management responses. The recent engagement had a strong focus on avifauna-specific issues, with less focus on other ecological and mahika kai matters and how these will be managed over the life of the solar farm.

Feedback received also suggested that draft consent conditions and associated management plans (including prescribed triggers and thresholds) are not anticipated to undergo significant change. This position contributes to the residual uncertainty regarding the environmental effects of the project noted above.

Notwithstanding this, it is understood that both applicants have prioritised the development of 'common' consent conditions within the prescribed timeframe, with project-specific and site-specific conditions temporarily set aside. It is therefore anticipated that Far North Solar Farm may revisit these matters following the completion of further ecological investigations and once a clearer pathway for addressing outstanding issues has been established.

3. The agreed results of those discussions, for instance, if there will be a Kaitiaki Forum, or Kaitiaki Governance Group, or similar to be established, and its purpose, role and how it might function.

At the time of preparing this response, no further engagement has occurred with either Lodestone Energy or Far North Solar Farm since the hui on 31 March 2026 (and subsequent post-hui information exchange, as included in **Appendix 1**).

However, it is anticipated that the level of detail provided in the mana whenua-specific consent conditions is sufficient to enable agreement with the applicants on their inclusion within the proposed set of 'common' conditions across both solar farm projects, should the applicants elect to adopt them.

If adopted, the following outcomes are anticipated:

Kaitiaki Governance Group

- **Establishment**– Lodestone Energy Limited and Far North Solar Farm Limited (as consent holders) will invite mana whenua (via the Papatipu Rūnaka) to establish the Kaitiaki Governance Group at least three months prior to the commencement of physical works. This invitation will enable mana whenua to determine the composition of the Group, including representation and frequency of hui.
- **Purpose and Role** – The primary purpose of the Kaitiaki Governance Group is to facilitate ongoing engagement and communication throughout the life of each solar farm project. A key role of the Group is to support the identification, development, and oversight of initiatives to be advanced through the Strategic Cultural Programme.
- **Function** – The detailed operation of the Group will be confirmed through the establishment process. However, as a minimum requirement, draft condition KGG4 provides that meetings will occur at least quarterly during the construction phase, and no less than annually thereafter.

Strategic Cultural Programme

- **Preparation and approval** – The consent holder will prepare a Strategic Cultural Programme in partnership with mana whenua, through the Kaitiaki Governance Group. The Programme will be developed at an early stage of project implementation (as specified in the relevant consent conditions) and will be subject to an agreed process for review and updating over time.
- **Purpose and role** – The purpose of the Strategic Cultural Programme is to provide a structured and tangible framework for mana whenua involvement in the delivery of project outcomes, including giving effect to mana whenua values and priorities in relation to ecological, cultural, and landscape matters.
- **The Programme** – will identify and guide initiatives that contribute to achieving the outcomes sought through the consent conditions, including (but not limited to) monitoring, mitigation, restoration, and enhancement activities, as well as opportunities for active participation by mana whenua.
- **Implementation and evolution** – The Strategic Cultural Programme is intended to be a live document, capable of evolving over the life of the project in response to monitoring results, environmental changes, and matters raised through the Kaitiaki Governance Group. This is intended to ensure that the Programme remains responsive, adaptive, and aligned with both project outcomes and mana whenua expectations over time.

Together, the Kaitiaki Governance Group and Strategic Cultural Programme provide an integrated framework to support ongoing engagement and the delivery of cultural and environmental outcomes over the life of each project.

Further commentary on the intent and drafting of these conditions is provided in **Appendix 1**.

4. Confirmation of whether agreement has been reached on the conditions to be put forward by the applicant.

Please refer to the comments above. While mana whenua feedback has been provided on the draft ‘common’ conditions, including the mana whenua-specific conditions, agreement has not yet been formally confirmed. In addition, the focus to date has been on getting the ‘common’ conditions aligned (in terms of format, structure and wording) with the site specific or project specific conditions put to the side for the time being (in part due to the need to gather further information through additional investigations and surveys).

There has not been a further opportunity to confirm final positions on the draft ‘common’ conditions since providing that feedback to Lodestone Energy and Far North Solar.

However, it is expected that both applicants will undertake further engagement with mana whenua to enable review of the revised conditions and confirmation of a final position ahead of the Expert Panels further deliberations.

Conclusion

Mana whenua, Te Rūnanga o Ngāi Tahu, AECL, and Aukaha appreciate the constructive engagement with Lodestone Energy and Far North Solar on their respective fast-track applications and associated consent conditions and look forward to continued engagement as the process progresses toward completion.

Key Contacts

Please contact AECL's Principal Planner, Kylie Hall, on [REDACTED] if you have any questions or require further clarification from AECL.

Please contact Aukaha's Senior Planner, Tim Vial, on [REDACTED] if you have any questions or require further clarification from Aukaha.

Please contact the Senior Planner, Amy Beran, contracted by Te Rūnanga o Ngāi Tahu, on [REDACTED], if you have any questions or require further clarification from Te Rūnanga o Ngāi Tahu

Kā mihi,



Maru Rout
Programme Leader - Mauri
Te Rūnanga o Ngāi Tahu



Ally Crane
General Manager
Aoraki Environmental Consultancy Limited



Cory Neale
Chief Executive
Aukaha

Appendix 1:

Post Hui Information provided to Lodestone Energy & Far North Solar Farm

Revised Mana Whenua Conditions

Dated 16 April 2026

Kaitiaki Governance Group (KGG)

KGG1 – Establishment

At least three (3) months prior to the commencement of physical works, the Consent Holder shall invite Mana Whenua to establish the Kaitiaki Governance Group in relation to the Solar Farm. The invitation shall seek direction on the identification of Mana Whenua representatives, the composition of the group and the frequency of hui.

Advice Note: Mana Whenua status is to be determined by Kā Papatipu Rūnaka which comprises Te Rūnanga o Arowhenua; Te Rūnanga o Waihao; and Te Rūnanga o Moeraki.

KGG2- Membership

The Kaitiaki Governance Group shall comprise:

- a. up to three (3) representatives of the Consent Holder; and
- b. up to three (3) representatives appointed by Mana Whenua who elect to participate in the Kaitiaki Governance Group.

When and if required, representatives from the Canterbury Regional Council, Mackenzie District Council, the Department of Conservation, and/or the Landowners, may be invited to attend Kaitiaki Governance Group meetings by agreement of the Kaitiaki Governance Group.

KGG3 – Purpose

The purpose of the Kaitiaki Governance Group includes:

- a. facilitating ongoing engagement and communication between the Consent Holder and Mana Whenua;
- b. supporting the preparation and overseeing the implementation of the Strategic Cultural Programme as described in Conditions SCP1-SCP3 below;
- c. enabling discussions between the Consent Holder and Mana Whenua on the effectiveness of the measures implemented by the Consent Holder to manage impacts on mana whenua values;
- d. providing feedback to the Consent Holder on the required management plans;
- e. providing a forum for mana whenua to share Mātauranga Māori and cultural perspectives relevant to the Project site and the surrounding environment;
- f. providing access to the site for the purposes of mahika kai harvest and other customary practices; and
- g. Identifying initiatives that recognise and provide for Mana Whenua values associated with the taiao.

Advice Note: Initiatives may include, but are not limited to, interpretive signage, pouwhenua, and/or artworks in locations agreed between the Consent Holder and Mana Whenua.

KGG4 – Meetings

The Consent Holder must invite the Kaitiaki Governance Group to meet at least quarterly during construction of the Project.

Following construction, the Kaitiaki Governance Group must meet at an agreed frequency, with at least one meeting held each calendar year.

KGG5- Information and Feedback

The Consent Holder must:

- a) provide the Kaitiaki Governance Group with up-to-date information relevant to the design, construction, operation, and decommissioning of the Solar Farm;
- b) Seek advice from the Kaitiaki Governance Group 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) Any advice provided by the Kaitiaki Governance Group (including advice from Aoraki Environmental Consultancy and/or Aukaha) on the draft management plans must be recorded and appended to the relevant management plan.

The Consent Holder must record a response to each comment, describing how the advice has been adopted in the management plan. Where advice provided by the Kaitiaki Governance Group has not been adopted, the reasons for not incorporating the advice must be recorded.

KGG6- Record-Keeping

The Consent Holder must maintain a record of matters raised through the KGG and the Consent Holder's response to those matters. Such records must be made available to Mackenzie District Council on request.

Strategic Cultural Programme (work programme)

SCP1 – Preparation

Prior to the commencement of physical works on site, a Strategic Cultural Programme must be prepared by the Kaitiaki Governance Group and provided to Mackenzie District Council for information. The Strategic Cultural Programme must be implemented for the duration of the Solar Farm.

SCP2 – Purpose

The Strategic Cultural Programme shall:

- a. Be a programme of works that integrates project outcomes and initiatives required by these resource consents to promote the mana of the taiao and the people;
 - b. Recognise and provide for Mana Whenua values of the area affected by the activities authorised by these resource consents and support the management of the impacts on those values through the implementation of monitoring, restoration and enhancement measures; and
 - c. Incorporate mātauranga Māori into environmental management associated with the Solar Farm.
-

SCP3 – Content

The Strategic Cultural Programme, shall include:

- a. Provision for participation of Mana Whenua in the monitoring, mitigation, restoration, and/or enhancement activities for the project site and other affected areas associated with the Solar Farm, as required by the conditions of these resource consents;
- b. Mechanisms to incorporate mātauranga Māori into environmental management practices associated with the Solar Farm;

- c. Cultural awareness or induction initiatives for project staff and contractors;
- d. Processes to identify and respond to matters affecting mana whenua values, including the health and wellbeing of the taiao, that may arise during the construction or operation of the Solar Farm; and
- e. Processes for periodic review of the programme to enable adaptation over time.

Participation / Opt-Out**SCP4 – Participation**

If Mana Whenua representatives invited to participate in the Kaitiaki Governance Group advise the Consent Holder that they do not wish to participate in the preparation or implementation of the Strategic Cultural Programme, the Consent Holder will not be required to comply with Conditions SCP1–SCP3.

For the avoidance of doubt, the Consent Holder must still demonstrate that reasonable steps have been taken to invite mana whenua to participate in accordance with Condition KGG1.

SCP5 – Resourcing

In the event no separate agreement is in place between the Consent Holder and Mana Whenua in relation to these resource consents, the Consent Holder shall meet the costs of establishing, resourcing, and paying (on an ongoing basis for the duration of this consent, where applicable) for any of the roles and functions of Mana Whenua in conditions KGG1-KGG6 and SCP1-SCP4.

SCP6-Access

The Consent Holder shall, subject to any relevant health and safety requirements, ensure that Mana Whenua representatives have access to all relevant parts of the Project site to enable them to carry out any of the roles and functions of Mana Whenua in under Conditions KGG1-KGG6 and SCP1-SCP4.

Meeting Notes

Solar Farms Hui – 31 March 2026 (10:30am to 3:30pm)

In person: Trevor McGlinchy (Moeraki) Ally Crane & Kylie Hall (AEC), Amy Beran, Deidre Francis (TRoNT).

Online: Tewera King (Waihao) & Karl Russell (Arowhenua) (all day), Mark Henry and Graham Ussher (for Lodestone Energy- 11am-1pm)

Brad Henderson and Daniel Cunningham (Lodestone Energy)- 11am to 1:00pm

Richard Homewood, John Andrews, Laila Alkamil, Carolyn Wratt and Della Bennett (Far North Solar Farm)- 1:30pm to 3pm.

2. Applicant Session – Haldon Solar Farm (Lodestone Energy)

- Daniel confirmed that further work is required in relation to ecological matters (plant investigations, bird strike assessments) so the overall ecological management approach is not yet finalized.
- However, the recently appointed lead ecologist will provide an overview of work undertaken to date and initial outcomes and potential approaches being considered (as part of the ecological management approach).
- Graham Ussher-
 - Confirmed that effects assessment package being collated and updated (effectively will replace previous ecological assessment work).
 - The package includes a potential enhancement/offset area within Haldon Farm (outside project site).
 - Botanical work- rare plant species are investigated at the site. Confirmed additional rare species (from what was observed by DOC during site visit) are present. Approximately 8-9 rare plant species confirmed.
 - Implication- ecological significance of the site confirmed.
 - Rare plant species salvage (during onsite works) likely to occur- with plants moved to a nursery for propagation. Aim will be to reintroduce back to the site (with additional plantings) to allow for net gain for rare plants.
 - Looking to publish ecological information (re- rare plant species)- there is no information/ very limited information about the success of reintroducing rare plant species (it is an experimental approach).
- **Mana whenua comments-**
 - Opportunity for Arowhenua Nursery to be involved with rare plant species work. Maria and Felicity identified as key contacts.

Avifauna work-

- No further surveys currently, noting spring surveys most appropriate timing.
- However, have existing information to utilise.
- Impacts expected by project- foraging and nesting areas lost.

- Bird strike risk- 19 species identified. Assessed impacts on habitat, types of birds (ground/ water), foraging.
- Overall- low risk of interactions with panels. 3 species more than minor risk.
- Verification work to occur onsite- bird strike checks.
- Triggers if strike occurs includes- toolbox approach (e.g. reduce visibility of panels, bird scarer device), back beyond- compensation.
- Existing information about bird strike risk at solar farms in NZ very limited- however some international literature relevant/ useful information.
- Will be ongoing monitoring undertaken which could also contribute to scientific research/ knowledge held in NZ.
- Carcass discovery work to be undertaken- Drone usage being investigated, along with cameras (at the site).

Lizards-

- Includes moving/ relocating to refuge areas (with habitat improvements, such as rocky areas).
- Ongoing ecological focused monitoring- 5 years.
- **Mana whenua comments-**
 - Expressed support for looking at opportunities to have Ngai Tahu whanui involved in monitoring work. Includes technical monitoring work (e.g. use of drones), pest control work (fencing and general control work), planting and maintenance work, research input opportunities.
 - Moeraki have a master's student focused on drone use and GIS skills also available within Ngai Tahu.
 - Arowhenua nursery has experience in pest eradication work.

Side agreement/ relationship agreement-

- Initial terms document has been prepared by Ngai Tahu legal team. Awaiting feedback/ approval from all Runanga before sharing with Lodestone Energy.
 - Legal opinion has been requested (due back 10 April but potentially sooner). Once the legal opinion has been received will be able to confirm next steps.

Consent condition work-

Changes/comments on revised conditions:

- 35-year consent duration for land use consent- agreed by all parties.
- Pest management approach- confirmed further work happening in this space. Further revisions anticipated to conditions (includes changes to fencing likely).
- Plant management plan- outcomes to be met (TBC- ongoing investigations at present).
- Stormwater management conditions- want to see specificity that stormwater discharges will go to ground/ be managed within the site boundaries. No discharging to waterbodies. Small revisions to the wording to clarify this (e.g. construction phase- ESCP- purpose needs some changes so that it does not refer to minimizing sediment laden discharges to waterbodies and more certainty in the operational phase stormwater management plan condition).

- Avifauna triggers for bird mortality vary between projects- understand this will likely change (through further work) but some clarification if these don't align (i.e. reasoning for differences for each site).
- ADP wording not consistent between MDC and ECan conditions. Could be due to template condition wording provided by ECan, but queried reasoning.
- **Mana whenua comments-** preference is that ADP aligns with latest HNZPT wording.

Mana whenua specific conditions-

- Kaitiaki Governance Group-
 - Some amendments to better focus the intention of the group and to also avoid any potential compliance issues (e.g. if some of the matters prescribed in the conditions can't be completed).
 - The KGG is seen as an important mechanism to allow for an ongoing relationship between mana whenua and the consent holder throughout the life of the project. The details of how the group function may however sit within a separate agreement (e.g. side agreement/ relationship document). The intent is to get the framework in place through the conditions, with bottom lines covered off.
- Cultural Monitoring Programme/ Strategic Work Programme-
 - Looking to take a broader approach- that allows for the establishment of a work programme (advanced through the KGG).
 - The thinking is that a monitoring programme is quite narrow in focus, however through ongoing discussions with mana whenua it seems more appropriate to allow for a broader approach to enable outputs from the group (e.g. could include initiatives, or projects to support monitoring, mitigation, restoration work etc).

3. Applicant Session – The Point Solar Farm (Far North Solar)

- Avifauna expert comments:
 - Noted limited DOC information about flight paths of birds (public information).
 - Approach to bird strike risk/ effects on avifauna includes-population variability, adaptive management and compensation.
 - Noted the success of the existing river bird recovery programme (led by DOC).
 - Surveying to include-
 - 6 months surveys (pre-construction),
 - Monthly monitoring during construction- post-construction.
 - Methods include- carcass recovery/ persistence trails- physical monitoring, could include use of dogs. Risk= human error.
 - Discussed option of using drones- would need to occur pre and after lunch (due to movement of panels).

Mana whenua comments- don't need to overcomplicate thinking on this matter. Once you understand the bird behaviors/ movements, then this will allow for effective monitoring.

- Pest management includes fencing (design TBC), regenerative areas, reserve area (14ha) and compensation package (with DOC input).

Consent condition work-

Changes/comments on revised conditions:

- 35-year consent duration for land use consent- agreed by all parties.
- Pest management approach- confirmed further work happening in this space. Further revisions anticipated to conditions (includes changes to fencing likely).
- Plant management plan- outcomes to be met (TBC- ongoing investigations at present).
- Stormwater management conditions- want to see specificity that stormwater discharges will go to ground/ be managed within the site boundaries. No discharging to waterbodies. Small revisions to the wording to clarify this (e.g. construction phase- ESCP- purpose needs some changes so that it does not refer to minimizing sediment laden discharges to waterbodies and more certainty in the operational phase stormwater management plan condition).
- Avifauna triggers for bird mortality vary between projects- understand this will likely change (through further work) but some clarification if these don't align (i.e. reasoning for differences for each site).
- ADP wording not consistent between MDC and ECan conditions. Could be due to template condition wording provided by ECan, but queried reasoning.
- Mana whenua comments- preference is that ADP aligns with latest HNZPT wording.

Mana whenua specific conditions-

- Kaitiaki Governance Group-
 - Some amendments to better focus the intention of the group and to also avoid any potential compliance issues (e.g. if some of the matters prescribed in the conditions can't be completed).
 - The KGG is seen as an important mechanism to allow for an ongoing relationship between mana whenua and the consent holder throughout the life of the project. The details of how the group functions may however sit within a separate agreement (e.g. side agreement/ relationship document). The intent to get the framework in place through the conditions, with bottom lines covered off.

- Cultural Monitoring Programme/ Strategic Work Programme-
 - Looking to take a broader approach- that allows for the establishment of a work programme (advanced through the KGG).
 - The thinking is that a monitoring programme is quite narrow in focus, however through ongoing discussions with mana whenua it seems more appropriate to allow for a broader approach to enable outputs from the group (e.g. could include initiatives, or projects to support monitoring, mitigation, restoration work etc).

- Changes to management plans- some changes to wording of conditions may be needed to allow for changes that may come out of KGG work. The wording currently prescribes where changes can occur but this may need to be extended to refer back to KGG outputs.

- DOC have not yet provided feedback to the revised condition sets.

- ECan have proposed some changes (which can be shared).

Side agreement-

- Initial terms document has been prepared by Ngai Tahu legal team. Awaiting feedback/ approval from all Runanga before sharing further.
 - Legal opinion has been requested (due back 10 April but potentially sooner). Once the legal opinion has been received will be able to confirm next steps.

Comments on draft condition set- dated 25 March 2026

Condition	Change/ amendment/ comment
ECan	
S15 Discharge Permit (Operational Phase)	
Stormwater Management Plan Condition	Can the wording be slightly amended to confirm no discharge to water, direct or otherwise? i.e. discharge into land?
S9 Earthworks	
Discovery of Archaeological Material	Cross reference against the accidental discovery protocol contained in the MDC conditions (#136)? There seems to be a notable difference between the two condition sets. Rūnanga have confirmed that their preference is to use the latest wording provided by HNZPT.
S15 Discharges (Construction Phase)	
Erosion and Sediment Control (ESC) The purpose of the ESC Plan refers to 'ensure that earthworks are managed to minimise the discharge of sediment into waterbodies and protect the receiving environment'.	As above, construction phase stormwater should avoid discharging into waterbodies (not minimising), i.e. be discharged onto land within the site boundaries. Infiltration into land.
MDC	
General conditions	
Consent duration condition- duration of land use consent 35 years	The Point condition set originally included this condition. It is requested that it is re-introduced as a common condition for both projects. Rūnanga don't see that this as an indication that the activity will cease at the end of the consent period, but that it provides a future check in point/ opportunity to reassess the activity (at a time when the effects are more understood). Given it is understood that there is likely to remain a level of uncertainty, particularly in terms of effects on avifauna and other ecological matters, it also broadly aligns with taking an adaptive management approach.
Kaitiaki Governance Group	Refer to supplied revised wording. Main changes seek to- <ul style="list-style-type: none"> - Provide flexibility as to the make up & composition of the KGG, meeting frequency/ arrangements. - Address potential compliance issues (e.g. should any of the conditions not

	<p>be implemented due to reasons outside of the consent holders control).</p> <ul style="list-style-type: none"> - Some further refinement of wording- including the resourcing condition (moved to the end of the mana whenua specific conditions).
Cultural Monitoring Programme	<p>Refer to revised wording. Moved to a broader work programme that is intended to provide more flexibility for Runanga to determine through the KGG their involvement/ input throughout the project. Also allows for the incorporation of matauranga maori into environmental management practices and to identify ways to respond to mana whenua values that may be impacted during construction or operation of the projects.</p>
Decommission condition- refers to notifying the Kaitiaki Governance Group (in advance).	Support this condition.
Pests conditions	
Haldon Solar Farm- refers to pest control for rabbits.	Further changes anticipated (through current ecological work being undertaken). TBC
The Point- Pest Mammal Management Plan	<p>Includes a comprehensive list of pest mammal species and includes specific targets and thresholds.</p> <p>It is understood that this management plan is unlikely to require further revisions (as part of the further work being undertaken).</p>
Vegetation conditions	
The Point- include a vegetation management plan and landscape management plan	<p>Not a specific concern/issue- but I don't quite understand what the differences are between the two plans (why there are two separate plans)?</p> <p>If possible, it would be helpful to understand the reasons for the approach taking (noting that Haldon Solar Farm has opted for a single plant management plan)?</p>
Haldon Solar Farm- Ecological Management Plan (overarching plan- incorporates all of the ecological effects management contained in related management plans)	<p>support the intention of having an overarching plan- i.e. allows for a more holistic management. Also may assist with ensuring there are no gaps or conflicting approaches between the various plans.</p> <p>Would the point consider taking a similar approach?</p>

Avifauna conditions	
84. bird mortality thresholds	<p>Noted that there is a difference between the two projects in terms of the number of bird mortality that triggers a response.</p> <p>It is understood that further work/changes to avifauna conditions and responses anticipated. Revisions TBC.</p> <p>Rūnanga raised concerns that potential loss of one species could be detrimental to the success/ survival of the species.</p> <p>Further information to be received.</p>
Changes to various management plans- general observation	
<p>The management plan conditions include accompanying provisions that set out the circumstances in which changes can be made to a management plan.</p>	<p>Consider whether amendments to relevant management plans (particularly those of interest to mana whenua) may be required as a result of matters/ outputs from the KGG and Strategic Cultural Programme. If so, this should be expressly recognised as a circumstance that may trigger a plan amendment?</p>