

## Attachment 20

# FNSF Response to Mana Whenua comments

26 February 2026

Tēnā koutou katoa,

Far North Solar Farm Limited (FNSF) thanks Te Rūnanga o Ngāi Tahu, Te Rūnanga o Arowhenua, Te Rūnanga o Moeraki and Te Rūnanga o Waihao for your Section 53 comments dated 19 February 2026. We sincerely appreciate the time, knowledge and perspectives you have shared, and we acknowledge the deep cultural, spiritual, historic and traditional associations Ngāi Tahu Whānui hold with Te Manahuna / Mackenzie Basin, including the statutory acknowledgement for Te Ao Mārama (Lake Benmore) and the taonga species listed in Schedule 97 of the Ngāi Tahu Claims Settlement Act 1998.

This document provides a high-level overview of the recent engagement with mana whenua to date relating to the Point Solar Farm development. It also sets out FNSF's direct responses to the points and comments raised in the s53 submissions received from:

- AECL (representing Te Rūnanga o Arowhenua);
- Aukaha (representing Te Rūnanga o Moeraki and Te Rūnanga o Waihao); and
- Te Rūnanga o Ngāi Tahu

FNSF welcomes the opportunity to reflect on the engagement undertaken to date with mana whenua in relation to the Point Solar Farm. We value the time, knowledge and perspectives shared through these hui and written submissions, and we recognise the cultural associations mana whenua hold with the wider landscape and project area.

FNSF remains committed to ongoing, constructive and good faith engagement with mana whenua, grounded in mutual respect, transparency and a willingness to respond appropriately to matters raised as the project progresses through the Fast-track process and into detailed design, construction and operation.

This response addresses each rūnanga's submission individually, grouping matters into themes while responding directly to the specific points raised. Where issues overlap, cross-references are noted for clarity.

## Response to Te Rūnanga o Ngāi Tahu Section 53 Comments (19 February 2026)

### Engagement and Partnership (paras 1.5–1.6, 4)

FNSF acknowledges the concern that early engagement was limited. We have always remained committed to ongoing engagement and have welcomed the opportunity to actively re-engaged since the Panel Convenor Conference. The three hui held to date, have focused on building a long-term partnership. We expect further discussion on this as part of our hui confirmed for 4 March 2026. We are optimistic that agreement in principle on the importance of a Kaitiaki Governance Group and Cultural Management Plan will provide a foundation for further engagement and ongoing development of the project. FNSF is committed to mana-to-mana engagement at all project stages and to collaborative draft consent conditions and provide opportunities for input into management plans, should the consent be granted.

## **Statutory Acknowledgement – Te Ao Mārama and Associated Waterways (paras 4.13–4.14, Schedule 59)**

FNSF respects the statutory acknowledgement for Te Ao Mārama and the associations with the Waitaki River pathway, nohoanga, wāhi tapu, mahinga kai, raupō, trails and mauri. The project is located on a highly modified cultivated terrace upstream of the lake. Operational stormwater is managed in accordance with best practice standards with no direct discharge to waterways that would affect the lake. Where ongoing concerns remain, we are keen to continue engagement on these matters, and to provide any further information, where helpful.

## **Taonga Species, Biodiversity and Cultural Values (Schedule 97 and related paragraphs)**

The February 2026 surveys show low on-site habitat values inside the panel footprint. Higher-value dryland, riverine, and wetland habitats are protected by 100 m exclusion setbacks. Avifauna mitigation (pre-works surveys, nest protection, design features to reduce strike risk, carcass monitoring with autopsy, and enforceable mortality thresholds) and the \$1,000,000 DOC Avifauna Compensation Strategy help to manage potential effects on threatened birds such as kākī. Lizard corridors and the proposed 14 ha invertebrate reserve deliver net gain and enhanced connectivity. FNSF supports mana whenua input into the ongoing development of these programs through the Kaitiaki Governance Group and implementation of the Cultural Management Plan.

## **Landscape, Cultural Landscapes and Cumulative Effects**

The February 2026 surveys and Rough Milne Mitchell assessment confirm the modified terrace makes only a minimal contribution to ONL ecological and cultural character. Effects are mitigated, remedied and avoided appropriately. Cumulative effects with Haldon Solar and Waitaki HEPS remain acceptable at the wider basin scale. FNSF confirms its willingness to collaborate with DOC, mana whenua and other proponents on coordinated management of cumulative effects.

## **Conditions, Governance and Long-term Outcomes**

FNSF supports embedding the Kaitiaki Governance Group and Cultural Management Plan in consent conditions with clear, measurable outcomes. We are keen to progress discussions on capacity building, employment and equity participation in our upcoming hui on 4 March 2026. Decommissioning and site rehabilitation will be addressed in conditions and we are keen to have input on this during the next hui.

## **Response to Te Rūnanga o Moeraki and Te Rūnanga o Waihao Section 53 Comments (19 February 2026)**

### **Introduction and Position (paras 1–9)**

FNSF thanks Te Rūnanga o Moeraki and Te Rūnanga o Waihao for their submission and for participating in the recent hui. We acknowledge your mana whenua status within the shared takiwā and the cultural associations with Te Manahuna. Engagement has been constructive and we look forward to our next discussions on a Kaitiaki Governance Group, Cultural Management Plan, and capacity building.

### **He Manawa Kāi Tahu: Mana Whenua Values Framework (paras 10–11)**

FNSF respects the values of Mana, Mauri, Tapu/Noa and Whakapapa. Our intention is that the project is designed to uphold these values, however, we acknowledge that there is further work to be done in these areas, and we welcome the opportunity to continue working together to ensure this can be delivered. We are optimistic that the KGG and Cultural Management plan, coupled with ongoing engagement and relationship building, will support this kaupapa.

## **Cultural Values, Landscape, Biodiversity, Wai Māuri and Access (paras 8–11)**

The modified terrace makes only a minimal contribution to cultural landscape character. Landscape effects are mitigated appropriately once planting matures. Cumulative effects remain acceptable given the clustered location and modified nature of the site. Biodiversity measures deliver net gain and protect taonga species. Wai māuri is protected through a high standard of stormwater management and 100 m setbacks from river margins. FNSF is committed to working together on opportunities to maintain access, where possible, to support ongoing connection to the whenua.

### **Conditions and Next Steps**

FNSF supports inclusion of the KGG and Cultural Management Plan in consent conditions and remains open to refinement. We have reviewed the updated KGG conditions provided by Ngai Tahu on February 19, and look forward to discussing conditions during the March 4 2026 hui, however, at this stage broadly support the current draft. We are committed to ongoing mana-to-mana engagement and to delivering measurable cultural, employment and partnership outcomes.

## **Response to Te Rūnanga o Arowhenua Section 53 Comments (via AECL, 19 February 2026)**

### **Positive Aspects of Solar and Overall Position (paras 8–9, 89–90)**

FNSF thanks Arowhenua for supporting renewable energy development in appropriate locations and for the constructive submission. We note Arowhenua's position that the project can proceed if outstanding concerns are addressed through partnership and conditions. FNSF shares this view and is committed to working collaboratively to achieve that outcome.

### **Consultation and Engagement (paras 10–22, Table 1)**

FNSF acknowledges the detailed critique of past engagement and the concern that further genuine engagement is required. We accept that pre-2025 engagement related to the earlier resource consent application and that substantive fast-track engagement began after the November 2025 Convenor Conference.

Since then, engagement has been constructive: three hui have been held (17 December 2025 online, 20 January 2026 site visit, 21 January 2026 Christchurch), with a further hui confirmed for 4 March 2026. We agree on the importance of a KGG and a Cultural Management Plan. FNSF is in general agreement with the draft conditions recently circulated and we look forward to discussing this further on the March 4 2026 hui. We support embedding these mechanisms in consent conditions and to mana whenua reimbursement for time and expertise through the partnership framework. FNSF is committed to genuine long term engagement across all stages of the project.

### **Concerns with Substantive Application – Cultural Impact Assessment and Planning Provisions (paras 23–32)**

FNSF notes the concern that the Cultural Impact Assessment (Appendix Q) is inadequate and does not fully explore degradation of cultural values or connection to place.

FNSF supports the development of a Cultural Management Plan (in collaboration with mana whenua) that applies a mātauranga Māori lens across all management plans.

FNSF also notes the request for assessment of adjoining SASM sites and relevant objectives/policies. FNSF is willing to provide further assessment if required, however, we also note the conclusions reached in the stormwater assessment that there would be no run-off effects outside the site perimeter. We are keen to discuss this further in the March 4 2026 hui and ensure that any further assessments address all outstanding issues and concerns.

### **Archaeological Sites and Wāhi Tapu (para 33)**

FNSF supports the accidental discovery protocol condition prepared by Heritage New Zealand attached as Appendix 1 to Arowhenua's submission and will incorporate it into amended conditions to be shared on 3 March 2026.

### **Ecological Assessment and Taonga Species (paras 34–42)**

FNSF supports Arowhenua/AECL providing feedback on revisions to the proposed ecological enhancement, and working together to implement any feedback both in delivery and throughout the life of the project.

### **Water Supply and Fire Risk (paras 43–45)**

FNSF notes the concern regarding fire risk and water storage. On-site fire water tanks will be sized and maintained in accordance with NZS 4509 and Fire and Emergency New Zealand guidelines. FNSF has engaged with FENZ on fire risk, both on this project and other projects around the motu. The draft conditions require a construction fire risk management plan (CFRMP) and Emergency Response Plan (ERP) (for both construction and operation) to be developed and approved by FENZ ahead of construction. This would be shared with the KGG for feedback ahead of being shared with MDC for certification at least 30 days prior to construction. FNSF is happy to discuss these concerns further at the March 4 2026 hui and provide further fire risk assessments if concerns remain.

### **National and Regional Benefits (paras 46–49)**

FNSF notes the scepticism regarding long-term job numbers. The project will create approximately 250 construction jobs during construction and 5–8 ongoing operational roles, with additional indirect benefits through local supply chains. FNSF is committed to collaborating with mana whenua on employment and skills training opportunities for local residents and rūnanga members through the KGG.

### **Loss of Connection to Site and Te Manahuna (paras 50–59)**

FNSF acknowledges the profound cultural history and the cumulative alienation experienced through hydro development, farming intensification, soil erosion, and the proliferation of pests across the landscape. "The Point" project is located on a highly modified cultivated terrace that has been farmed for decades. The proposed 81 ha ecological enhancement area will help restore the natural character to part of the land, and provide opportunities for connectivity that are not currently available. FNSF supports the KGGp as the mechanism for mana whenua to guide ongoing restoration and cultural reconnection outcomes.

### **Cumulative Effects – Multiple Solar Farms in Te Manahuna (paras 60–79)**

FNSF notes the concern regarding the concentration of solar development in the southern basin and the potential for further projects. The Rough Milne Mitchell cumulative assessment (RFI Response 2 – Landscape, 23 February 2026) addresses the five listed/referred projects and concludes effects remain acceptable at the wider basin scale. FNSF confirms its willingness to collaborate with DOC, mana whenua and other proponents on coordinated management of cumulative ecological and landscape effects.

FNSF acknowledges the specific cumulative ecosystem concerns raised (paras 73–78):

- **Land development effects (soil erosion, compaction, habitat fragmentation):** The panel footprint is existing pasture with very low indigenous values. Panels are elevated on piles with minimal ground disturbance. Ground cover will be maintained or enhanced beneath arrays,

and the 81 ha enhancement area plus perimeter planting will increase indigenous cover and connectivity for indigenous fauna.

- **Post-construction microclimate and aquatic effects (heat islands, altered evaporation, water temperatures, insect/bird mortality):** The issues of heat islands and elevated water temperatures are frequently raised in solar farm discussions but lack robust scientific support, particularly given the wide variability in installation contexts and site conditions. At The Point, with a low panel coverage ratio of under 30 % in a highly open, wind-exposed environment, normal air movement prevents any measurable heat island effect from developing. Altered evaporation occurs only at a very small scale: panels reduce direct sunlight on the ground beneath them, which can allow slightly higher soil moisture retention. The site is currently sown in grass that will remain under the panels; this may result in modestly improved grass growth in shaded areas, which will be managed through light rotational grazing to prevent excessive vegetation height. Importantly, the solar farm cannot increase the temperature of any nearby water bodies. The site is upstream of Te Ao Mārama with no direct discharge to waterways, and operational stormwater is managed to high standards with no off-site runoff. Elevated panels and maintained ground cover further minimise any microclimate influence compared with sealed or heavily compacted surfaces. Avifauna design features (anti-reflective coatings on panels and the standard night-time rest position) together with systematic carcass monitoring and autopsy address any potential attraction or collision risks.
- **Long-term maintenance and grazing:** Grazing will be light and managed under the Vegetation Management Plan with input from the Kaitiaki Governance Group. Pest plant and animal control is site-wide and long-term. No routine herbicides/pesticides are proposed beyond targeted weed control in the enhancement areas.
- **End-of-life panel waste (toxic materials, lack of NZ recycling infrastructure):** FNSF is committed to responsible decommissioning and recycling in accordance with best practice at the time. This includes the removal and safe storage (protected from rain) of any damaged panels. Conditions will require a Decommissioning Plan that addresses panel removal, recycling where possible, and site restoration.

#### **Renewable Energy Efficiencies and Broader Concerns (paras 81–85)**

FNSF notes the concern raised regarding the concentration of multiple large-scale solar farms in one localised area of the Mackenzie Basin and the potential implications for grid stability, transmission efficiency, distribution constraints and overall renewable energy planning.

The Point Solar Farm is uniquely positioned to deliver high-efficiency renewable generation with minimal transmission losses and strong system-level benefits:

- **220 kV connection point** — The project connects directly to the existing 220 kV Benmore-Islington (BEN-ISL) line at a point very close to the Benmore substation. This short-distance, high-voltage connection results in **very low transmission losses** (typically <1–2% over the distance to the HVDC link at Benmore). In contrast, many other proposed solar projects across the motu connect at 33kV connection points, leading to higher line losses and lower efficiency.
- **Co-location with Waitaki hydro storage** — The project sits immediately adjacent to some of New Zealand's largest hydro stations. Daytime solar generation allows operators to reduce hydro output during high solar periods, storing water for release during evening peak demand, winter high-demand periods and dry-year shortages. This hydro-solar synergy improves overall grid resilience, reduces reliance on thermal peakers and enhances security of supply — outcomes that are nationally significant under the NPS-REG and the FTAA purpose.
- **Transmission Works Agreement (TWA) with Transpower** — The signed TWA (executed 2024) confirms technical feasibility, grid connection capacity. This provides a high degree of certainty that the project can be integrated efficiently without creating transmission constraints.



**Collaborative Approach to Ecological Restoration and Pest Management (paras 86–87)**

FNSF supports Arowhenua’s desire for input into ecological restoration and pest management through a ki uta ki tai approach. This will be facilitated through the KGG and Cultural Management Plan. FNSF is also willing to coordinate with DOC and other solar proponents on Basin-wide pest control and restoration.

**Conclusion (paras 88–90)**

FNSF thanks Arowhenua for the constructive conclusion and the willingness to support the project if concerns are addressed through partnership and ongoing engagement. FNSF is committed to that partnership and to embedding the KGG and Cultural Management Plan in consent conditions.