

19 February 2026

**Expert Panel  
The Point Solar Project  
c/o Fast-Track Team  
WELLINGTON**

By email to [substantive@fasttrack.govt.nz](mailto:substantive@fasttrack.govt.nz)

Tēnā koutou katoa,

**Te Rūnanga o Ngāi Tahu comments on substantive application under the Fast-track Approvals Act 2024 – The Point Solar Project [FTAA-2509-1100]**

**1. Introduction**

- 1.1 Te Rūnanga o Ngāi Tahu (Te Rūnanga) welcomes the opportunity to provide comments on the substantive application made by Far North Solar Farm Limited (Far North Solar) for the Point Solar Project, in Te Manahuna (Mackenzie Basin) (the Project).
- 1.2 Te Rūnanga supports the comments made by Te Rūnanga o Arowhenua, Te Rūnanga o Waihao, and Te Rūnanga o Moeraki (**Waitaki Rūnanga**).
- 1.3 While Te Rūnanga supports the broader kaupapa of renewable energy development, it **opposes** the substantive application as currently proposed. Te Rūnanga current position is a precautionary approach considering the outstanding concerns and potential adverse effects on Ngāi Tahu settlement matters (including associated cultural values, ecological and landscape values and access to whenua and natural resources), as outlined in these comments.
- 1.4 This position **is not fixed**. Te Rūnanga remains open to revisiting its stance if additional information addresses its concerns, or conditions are strengthened, governance mechanisms, and monitoring requirements are put in place to address the concerns outlined in this document.
- 1.5 Te Rūnanga understands that previous engagement challenges and a lack of understanding of mana whenua perspectives have in part influenced mana whenua position on the current substantive application. Te Rūnanga supports the position of Waitaki Rūnanga.
- 1.6 Te Rūnanga anticipates that Far North Solar will continue to engage with mana whenua and Te Rūnanga in a meaningful way to respond to, and where possible, address the

matters set out in these comments and in the separately provided comments of Waitaki Rūnanga (on behalf of 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”.<sup>1</sup>
- 2.4 While Te Rūnanga is the iwi authority, the Papatipu Rūnanga are the legal entities that represent mana whenua, being the hapū and whānau who hold customary authority within their respective takiwā. In planning processes, Te Rūnanga recognises the distinct status and role of the Papatipu Rūnanga and, in practice, defers to them as the representatives of mana whenua and as the holders of place-based knowledge and expertise in relation to 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 Point Solar Project

- 3.1. Our comments on the Point Solar Project (the Project) are set out below.

## 4. Engagement with Far North Solar Farm

- 4.1. As detailed in the comments made by Aoraki Environmental Consultancy Limited (AECL), on behalf of Arowhenua Rūnanga, engagement prior to Far North Solar lodging its substantive application under the Fast-track Approvals Act (FTAA) was limited to

<sup>1</sup> Te Rūnanga submission, appendix A – Text of Crown Apology, paragraph 8

consultation undertaken in 2023 in relation to a resource consent application lodged with Mackenzie District Council. That engagement did not relate specifically to the current substantive application.

- 4.2. Te Rūnanga was not involved in the original resource consent process for the project in 2023 or the associated consultation process with mana whenua at that time. Te Rūnanga first engagement with Far North Solar in relation to the substantive application occurred at the Panel Convenor Conference on 17 November 2025. During the conference, the Panel Convenor considered that sufficient time remained for meaningful engagement and strongly encouraged all parties to engage prior to the submission of comments on the application.
- 4.3. Since attending the Panel Convenors Conference, Te Rūnanga and mana whenua have engaged constructively and in good faith with Far North Solar. The full details of engagement undertaken with Far North Solar are set out in the comments made by AECL, and include:
- **17 December 2025-** Initial online meeting to receive an update from Far North Solar on the project (including changes since 2023) and discuss options for re-establishing the relationship between mana whenua and Far North Solar.
  - **20 January 2026-** Face-to-face meeting in Twizel, which included an informal discussion over lunch followed by a visit to the project site. Several hours were spent on site, with three vehicles travelling through the project area (including two vehicles occupied by Rūnaka representatives, AEC, Aukaha and Te Rūnanga personnel and one vehicle occupied by Far North Solar representatives). The visit commenced near the proposed access road at north-west corner of the site and generally followed the eastern boundary (within the proposed ecological enhancement area) toward the southern boundary. Nearby gullies, adjoining rivers (including the Pūkaki) and hydro infrastructure were viewed. From the southern extent of the site, the Ōhau C hydro power station and surrounding roads were noted as visible due to the elevation of the site.
  - **21 January 2026-** Face-to-face meeting in Christchurch (a debrief meeting held at the Te Rūnanga o Ngāi Tahu offices). During this meeting, mana whenua began outlining their perspectives on the project, including:
    - Broad support for the clean energy Kaupapa.
    - Concerns regarding the ongoing disconnection of mana whenua from Te Manahuna, acknowledging that this issue may not be fully mitigatable and requires further discussion.
    - A view that environmental impacts should be assessed through a broader cultural lens, not solely within the scope typically applied by the Department of Conservation (DOC). Environmental management plans should therefore support the outcomes sought by both mana whenua and DOC.
    - The potential role of a cultural management plan or monitoring mechanism to secure firm commitments to achieving cultural outcomes.
    - The need for ongoing mana-to-mana engagement throughout the project (potentially through a kaitiaki rōpū or governance model).

- The importance, given the pace of the FTAA process, of securing key commitments through consent conditions while allowing more detailed matters to be progressed through management plans or related mechanisms.
- 4.4. During the most recent engagement, Far North Solar indicated a commitment to building a long-term relationship with mana whenua. This commitment is understood to extend beyond minimising potential adverse cultural effects (should approvals be granted) to contributing to mana-enhancing outcomes for current and future Ngāi Tahu Whānui, given the immense cultural significance of Te Manahuna.
- 4.5. While Far North Solar and mana whenua are continuing to formalise a relationship outside of the FTAA 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).
- 4.6. Following the January meetings, Far North Solar circulated an updated set of draft consent conditions which included a 'Kaitiaki Forum' condition. It was acknowledged in accompanying email correspondence that this condition had been adopted for other projects and was provided as a starting point for discussion, with further detail to be developed. However, it appears that there has been some misunderstanding regarding the status of this condition. Te Rūnanga understanding is that the wording of the Kaitiaki Forum condition has not been finalised or agreed on with mana whenua. To date, discussions have been preliminary and evolving in nature. As such further refinement is necessary to ensure it better reflects the intended governance-level role for mana whenua and aligns with their values and associations with Te Manahuna.
- 4.7. Accordingly, it is requested that Far North Solar amends the draft wording for the Kaitiaki Forum condition to provide for the establishment of a Kaitiaki Governance Group (KGG).
- 4.8. The purpose of the KGG would include:
- Provide for ongoing engagement between Far North Solar and mana whenua (at a mana-to-mana level) throughout the project's life.
  - Enable mana whenua input into the management of cultural effects, including review of monitoring results and discussion of avoidance, remediation, and mitigation measures.
  - Provide a forum for broader cultural advice, including further initiatives that respond to the cultural and historical context of the site.
  - Support implementation and oversight of cultural safeguards, including the Cultural Monitoring Programme.
- 4.9. Te Rūnanga also seeks a consent condition requiring the establishment and implementation of a Cultural Monitoring Programme (CMP) in collaboration with mana whenua. While earlier discussions with Far North Solar were more broadly focused on a management plan-type document, mana whenua have since noted that the primary intent of this proposed mechanism is to provide a structured and ongoing opportunity to apply a cultural lens to the range of management plans proposed for the project.
- 4.10. The CMP is therefore intended to function as a more specific and focused monitoring framework, enabling mana whenua to assess, from their perspective, the effectiveness of management measures in maintaining and enhancing cultural values over time. It is also noted that through the KGG, mana whenua will have opportunities throughout the Project

to input into and if needed amend various management plans and other responses required under the conditions of the consent.

4.11. 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.

4.12. Te Rūnanga and mana whenua would welcome the opportunity to further discuss with Far North Solar the substance and practical operation of the proposed conditions, given the recent and evolving nature of these discussions. It is understood that a face-to-face meeting between mana whenua, Te Rūnanga and Far North Solar is currently being planned in Christchurch for 4 March 2026. This meeting is anticipated to provide an opportunity to advance discussions, including in relation to the matters raised in these comments and in the comments made by mana whenua.

## Settlement provisions

### Statutory Acknowledgement- Te Ao Mārama

4.13. The project is located near the Statutory Acknowledgement for Te Ao Mārama (Lake Benmore) and is adjacent to the Twizel River, Pūkaki, and Tekapo Rivers. While these rivers are not themselves identified as statutory acknowledgement areas under the NTCSA, they flow either directly or indirectly (including through controlled regimes) into Te Ao Mārama. As such, Te Ao Mārama is considered the receiving environment for these waterways. Any impacts on water quality (including through discharging activities) or on flow characteristics of these rivers have the potential to affect the values associated with the statutory acknowledgement area.

4.14. 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.
- 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 Management

- 4.15. The substantive application provides limited information regarding potential stormwater effects, including impacts on groundwater quality, potential contaminants and run-off generated by the project, and does not clearly specify proposed treatment and management approaches.
- 4.16. While section 6.10 of the substantive application refers to a subsoil drainage system, surface drainage, soak pits and infiltration to ground water which appear to relate to the substation platform, there is limited detail as to how these methods might be implemented and monitored. The stormwater assessment prepared by Haigh Workman Ltd does not include any further information or detailed drawings on stormwater design methods.
- 4.17. Haigh Workman Ltd provided a response to the Expert Panel's request 1 for further information (RFI 1), point 1.10. The response states that the project can achieve stormwater neutrality and even decrease peak flow rates in flood events. Control of the peak rates is achieved by the planting of 89ha<sup>2</sup> of farmland with low lying native plants around the border of the site. Water quality is also expected to remain the same or improve. Because no adverse effects to stormwater quality or quantity are expected during the operational phase, ongoing monitoring of stormwater runoff quality for contaminants is not considered necessary. While adverse stormwater effects are not expected, Te Rūnanga considers that ongoing monitoring and adaptive management mechanisms should be carefully considered by Far North Solar.
- 4.18. Notwithstanding, Appendix 11 of Far North Solar's response to RFI 1 outlines that actual and potential stormwater effects will be managed through a range of proposed conditions and management measures. These include preparation of an Erosion and Sediment Control Plan (ESCP), a Construction Management Plan, detailed stormwater management plans, and inspection of the stormwater system. In relation to soil and groundwater contamination, a State of Environment Monitoring Plan, soil and groundwater monitoring parameters, and a Decommissioning Management Plan are also proposed.
- 4.19. While Te Rūnanga has not reviewed any draft management plans or detailed information relating to these proposed measures, their inclusion through consent conditions provides some assurance that mechanisms will be in place to appropriately manage stormwater generated onsite (subject to further detail). Te Rūnanga notes that opportunities for mana whenua to input into the development of these management plans and detailed design plans are anticipated through the establishment of the KGG (as a condition of consent).
- 4.20. In addition, if any of these draft management plans or detailed design plans are prepared during the substantive application process (rather than prior to construction work commencing), Te Rūnanga anticipates that Far North Solar will provide mana whenua with an opportunity to review and comment on these draft documents.
- 4.21. Te Rūnanga is aware that further revisions to the proposed ecological enhancement approach are being worked through by Far North Solar and DOC which could see larger areas around the border of the site (within an 82-ha area) remain unplanted, with smaller

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<sup>2</sup> Note- the proposed 89ha area is understood to have been slightly reduced to 82ha.

areas intensively planted instead. If this approach is implemented, it would be useful to understand whether these revisions impact on the modelling assumptions and predicated peak flows across the site, given the control of peak rates is to be achieved through the planting of low-lying native vegetation around the border of the site.

### ***Haldon Arm Nohoanga Entitlement***

- 4.22. A nohoanga entitlement is located near the project site at Haldon Arm, near the edge of Te Ao Mārama. Adverse effects on Te Ao Mārama and the surrounding area therefore have the potential to compromise Ngāi Tahu Whānui ability to utilise the nohoanga entitlement as intended under the settlement. This relates not only to the exercise of mahinga kai, but also to maintaining cultural connections to the wider landscape.
- 4.23. 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 and to experience the landscape as their tūpuna did. Their purpose is to revitalise traditional practices of gathering food and natural resources and pass this knowledge down to the next generation. The ability for Ngāi Tahu Whānui to connect and engage with the surrounding landscape is therefore essential to enable the success of nohoanga sites.
- 4.24. Given the project involves the establishment of large-scale infrastructure, Te Rūnanga is concerned that opportunities for Ngāi Tahu Whānui to access areas within and near the site could be constrained by infrastructure protection requirements and health and safety considerations. The broader concern regarding the loss of connection to the site and Te Manahuna is detailed in the comments made by AECL<sup>3</sup>, which outline the historic and ongoing alienation of Ngāi Tahu from Te Manahuna. In those comments, Arowhenua Rūnanga express concerns that the establishment of large-scale solar farms may further alienate mana whenua from their ancestral land, further weakening the links present generations maintain with their whakapapa and adversely impacting cultural identity, including that of tamariki (children). Arowhenua Rūnanga consider that the granting of the substantive application would not adequately provide for the spiritual and cultural needs of mana whenua.
- 4.25. Similarly, Moeraki Rūnanga and Waihao Rūnanga (through the comments prepared by Aukaha) emphasise that consideration of solar farm development in Te Manahuna cannot focus solely on the current generation. Ensuring that future generations are able to thrive is identified as a central concern. The mana whenua values-based framework set out in Aukaha comments demonstrates that the wellbeing of Ngāi Tahu Whānui is intrinsically linked with the wellbeing of the environment.
- 4.26. During a site visit with Far North Solar Farm<sup>4</sup>, the potential for providing physical access for Ngāi Tahu Whānui within parts of the proposed 82ha ecological enhancement area was briefly discussed. Far North Solar has since invited mana whenua to provide feedback on the revisions to the ecological enhancement approach (being undertaken with DOC), which could enable those discussions to continue. In principle, Te Rūnanga supports this further involvement and understands that mana whenua intend to engage on the proposed ecological enhancement approach. The proposed establishment of a KGG is also expected to provide an ongoing forum for engagement (between mana whenua and Far North Solar) and input on the project, beyond the consent process.

<sup>3</sup> Refer to Arowhenua Rūnanga comments prepared by Aoraki Environmental Consultancy Ltd, loss of connection to site and Te Manahuna section.

<sup>4</sup> Tuesday 20 January 2026.

- 4.27. In terms of landscape and visual effects, Te Rūnanga considers it important that Ngāi Tahu Whānui can perceive and experience the landscape in a manner consistent with how it was experienced by their tūpuna, supporting cultural identity, connection, and sense of place. While Outstanding Natural Landscape (ONL) values are typically assessed by using biophysical and visual attributes, for Ngāi Tahu the landscape is inseparable from cultural and ancestral associations. Effects on landscape character therefore also affect cultural identity and whakapapa connections to Te Manahuna.
- 4.28. The Mackenzie District Plan recognises these associations, including ONL specific policies NFL-P2 (which seeks to recognise that within Te Manahuna ONL there are areas, places and features of particular significance to Ngāi Tahu) and NFL-P5 (which seeks to recognise the significance of the lakes of Te Manahuna, their margins and settings to Ngāi Tahu). The relevant Sites and Areas of Significance to Māori (SASM) are detailed in AEC comments.
- 4.29. Arowhenua Rūnanga (through the AEC comments) have expressed their reassurance in the fact that large expanses of the basin are protected from further land intensification through planning instruments, including ONL and SASM.
- 4.30. The landscape assessment prepared by RMM (in May 2023), evaluates the actual and potential landscape and visual effects of the project. The RFI 1 response provided by RMM confirms that this assessment relied on the landscape mitigation planting for screening purposes, which has not materially altered since 2023. As such, the outcomes in the assessment remain relevant.
- 4.31. The assessment concludes that the proposed solar farm will be visible from several public spaces, including tracks and a road, resulting in adverse visual effects of a moderate degree. The project is assessed as having low-moderate to moderate adverse landscape effects on the Mackenzie Basin's outstanding landscape values, with proposed landscape treatment and ecological and biodiversity enhancement activities reducing effects from moderate-high to moderate. An addendum to the 2023 assessment was prepared in April 2025 which reaches the same conclusions.
- 4.32. Beyond engagement on revisions to the ecological enhancement approach, Te Rūnanga considers that the proposed KGG, together with the CMP condition (discussed with Far North Solar), will provide ongoing opportunities to identify and progress measures that maintain and enhance Ngāi Tahu connections with the landscape over time.

### ***Taonga Species***

- 4.33. 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. As such, the absence of a species from Schedules 97 or 98 should not be seen as diminishing its cultural significance to Ngāi Tahu Whānui.
- 4.34. The ecological assessment prepared by Wildlands Consultants (in May 2023), identifies that up to 17 taonga bird species may be present within the project site, including kaki (black stilt), tara (terns) and pāpera (grey duck). The site is immediately adjacent to an Important Bird Area (IBA), and that a full suite of endemic braided river birds are found in

braided river habitat at the Delta (noting that the site is in the wedge that forms the Ōhau-Tekapo Delta, where the Ōhau and Tekapo Rivers enter Lake Benmore).

- 4.35. In terms of vegetation and habitats, the May 2023 assessment describes the site as predominately grazed exotic grassland and cropland, with some indigenous dryland and shrubland communities around the margins. While no wetlands are located on the site, there are a number of wetlands within 100 metres of the site boundary. Six different vegetation and habitat types are identified in the assessment<sup>5</sup>.
- 4.36. It is noted that AgScience undertook a site visit on 17 December 2025 and reached different conclusions, including that no indigenous vegetation communities are present at the site, that no further ecological assessment is required and that the high degree of modification has eliminated natural habitat for indigenous fauna.
- 4.37. It is understood that following AgScience's input, Wildlands Consultants undertook additional vegetation surveys in January 2026. Those surveys reportedly found that the site had undergone only very minor changes in vegetation and habitat since the 2022 survey (which informed the May 2023 assessment). On that basis, it is understood that AgScience's observations have been superseded by the January 2026 Wildlands Consultants survey work.
- 4.38. The potential presence of taonga species and the site's proximity to significant braided river habitat is considered to reinforce the importance of ensuring that ecological mitigation measures are robust, culturally informed, and responsive to the values Ngāi Tahu associate with these species and environments.

#### *Ecological Issues & Additional Survey Work*

- 4.39. In relation to avifauna compensation, it is understood that there has been a shift towards Far North Solar providing financial support for existing DOC predator control programmes that support a range of birds and other fauna across Te Manahuna. This change in approach could provide opportunities for other solar farm projects to contribute to the same broader predator control programmes which may allow for greater coordination and oversight across different projects. At present, Te Rūnanga is not aware of any formal coordination between the different solar farm projects (e.g. Haldon at this stage).
- 4.40. Te Rūnanga understands that changes to the proposed ecological enhancement approach are being worked through by Far North Solar with DOC. The RFI responses submitted by Wildlands<sup>6</sup> confirm that the Ecological Enhancement Plan (EEP) and related draft management plans will be available on 23 February 2026. The scope of the EEP is anticipated to include:
- a 14ha enhancement area around two gullies that is predator-proof fenced,
  - pest animal and plant management throughout the site;
  - indigenous woody vegetation within the visual screening planting areas;
  - several additional clusters of indigenous woody revegetation along the eastern side of the site; and

<sup>5</sup> Includes Sweet briar-matagouri shrubland, cocksfoot grassland, Stonefield drylands etc, refer to page 8 of assessment.

<sup>6</sup> Appendix 6- in response to expert panels ecological issues and Appendix 9- Ecological Enhancement Approach

- establishment of several rock features as habitat enhancements (for lizards and invertebrates).
- 4.41. It is further understood that targeted surveys for lizards, invertebrates, avifauna and threatened plantings (that may be present at the site), together with quantitative vegetation surveys are underway and will also be available on 23 February 2026. These surveys are anticipated to inform the suite of draft management plans that are to be developed and made available on the same date.
- 4.42. Minute 5 of the Expert Panel (dated 13 February 2026) confirms that Te Rūnanga and mana whenua (as s53 entities) will have an opportunity to comment on the further survey material, with responses to due by 5pm, 27 February 2026 (four working days after the further survey evidence is received).
- 4.43. Te Rūnanga acknowledges the opportunity to review and comment on the further survey material and the Ecological Enhancement Plan anticipated on 23 February 2026. Te Rūnanga therefore reserves its position on the ecological effects of the project until that material has been received and considered in full.
- 4.44. This reservation also reflects anticipated opportunities for mana whenua to further engage with DOC and Far North Solar once this additional information becomes available.

### ***Cumulative effects***

- 4.45. As outlined in Te Rūnanga comments made on the Haldon Solar Farm, cumulative effects may arise over time within Te Manahuna if multiple large-scale solar farms are established. Such development has the potential to change the currently open landscape of Te Manahuna into a more industrial type of landscape characterised by extensive solar infrastructure and associated built form. This change could affect Ngāi Tahu ability to connect with the landscape, including access to nohoanga entitlements (such as Haldon Arm), mahinga kai activities, and important landforms and waterbodies. Cumulative development throughout the basin could also reduce habitat availability and ecological connectivity for taonga species.
- 4.46. While no solar farms have been consented or constructed yet in Te Manahuna, five of the nine previously identified solar farm proposals (refer to **Appendix Five**) are considered likely to progress to a substantive application stage under the FTAA. A decision for the Haldon Solar Farm is due in May 2026, followed by the Point in June 2026. Te Rūnanga also understands (from recent engagement with Nova Energy) that a substantive application for the adjoining Twizel Solar Farm Project is expected to be lodged with the EPA in April 2026. Accordingly, substantive applications for the three projects clustered in the southern basin are likely to be determined by Expert Panels (under the FTAA) before the end of 2026. In assessing the cumulative effects in relation to the Point project, it is considered particularly relevant to assess these three projects collectively.

### ***Cumulative Landscape Effects***

- 4.47. RMM's RFI 1 response includes a cumulative landscape effects assessment of the five listed or referred solar farms in Te Manahuna<sup>7</sup>. The assessment notes that the clustering of the Twizel, Point, and Haldon solar farms in the southern basin, alongside existing hydro infrastructure and Twizel township, may reduce the perception of widespread development across the wider basin area. Nevertheless, these projects are assessed as generating

<sup>7</sup> The Twizel Solar Farm, The Point Solar Farm (the proposal), The Haldon Solar Farm, Grampians, Balmoral Station Solar Farm.

moderate to moderate-high cumulative adverse effects on the southern basin's landscape character and values. The assessment also notes that cumulative effects on the southern basin would be reduced if the Haldon solar farm did not proceed, as it contributes to a perception of being surrounded by solar infrastructure for lake and campground users. Within the wider basin the adverse effects of the three clustered projects are considered to be low.

- 4.48. Collectively, the five proposed solar farms are assessed as having moderate-high to high adverse cumulative effects on Te Manahuna landscape character and ONL values, primarily due to the geographic spread associated with the Balmoral and Grampians proposals.
- 4.49. Given that the project specific assessment identifies at least low-moderate adverse landscape effects, and that the three clustered projects (including the Point and Haldon) are expected to result in at least moderate cumulative landscape effects on the southern part of the basin, the proposed EEP which is understood to include landscape planting and ecological mitigation, is considered to be crucial in reducing adverse visual and landscape impacts.
- 4.50. There may also be merit in exploring coordinated ecological and landscape enhancement works across both Haldon Solar and the Point projects within the southern part of the basin. Te Rūnanga also considers there could be merit in exploring opportunities to coordinate ecological enhancement approaches across the Haldon Solar Farm and the Point sites. Such coordination, potentially involving DOC and mana whenua (should both applicants be willing to engage in this manner), could assist in managing cumulative effects more holistically across the southern basin.

### ***Other comments***

#### ***Capacity constraints in existing transmission infrastructure***

- 4.51. Te Rūnanga previously raised concerns regarding potential capacity constraints within the existing transmission infrastructure, which could physically limit the ability for multiple large-scale solar farms to be constructed in Te Manahuna (noting this was in relation to the Haldon Solar Project). Transpower has since provided clarification on this matter as part of the comments made on the substantive application for the Haldon Solar Farm. While Transpower's response contains limited detail, it clearly states that there are no barriers preventing both the Haldon Solar and the Point from connecting to the existing transmission infrastructure.
- 4.52. On this basis, Te Rūnanga now understands that there are no immediate transmission capacity constraints that would limit the development of either project.
- 4.53. Te Rūnanga also considers it would be helpful for Transpower to provide commentary on the potential cumulative transmission implications of the other three (listed or referred) projects that could progress to a substantive application stage under the FTAA. This is particularly relevant in relation to Nova Energy's project (Twizel Solar Farm) which is understood to be the next substantive application to be lodged through the EPA.

#### ***Next Steps- Further Engagement***

- 4.54. Further meaningful engagement between Te Rūnanga, mana whenua (represented by both Waitaki Rūnanga and their respective environmental entities, AEC and Aukaha) and Far North Solar will be needed to continue working through the matters raised in these comments, as well as those made by mana whenua.

4.55. Te Rūnanga is currently assisting with arrangements for a face-to-face meeting between all parties on 4 March 2026. It is anticipated that the meeting will provide an opportunity to advance key matters, including:

- The proposed Kaitiaki Governance Group (KGG) and Cultural Monitoring Programme (CMP) consent conditions sought by mana whenua.
- The ecological enhancement approach, including consideration of access opportunities previously discussed by mana whenua, and potential coordination across both the Haldon Solar and Point project sites.
- Draft ecological management plans and other relevant draft management plans that may be available prior to the meeting, and how mana whenua input can be incorporated.

## 5. Decision Sought & Closing

5.1. Te Rūnanga thanks the Expert Panel for the opportunity to comment on the substantive application made by Far North Solar Farm Limited for the Point Solar Project.

5.2. While Te Rūnanga supports the broader kaupapa of renewable energy development, it **opposes** the substantive application as currently proposed. This precautionary position reflects outstanding concerns and the potential adverse effects on Ngāi Tahu settlement matters, including associated cultural values, ecological and landscape values, and access to whenua and natural resources, as outlined in these comments.

5.3. This position is **not fixed**. Te Rūnanga remains open to revisiting its stance if additional information addresses its concerns, or conditions are strengthened, governance mechanisms, and monitoring requirements are put in place to address the concerns outlined in this document.

5.4. Te Rūnanga welcomes the opportunity to continue engaging with Far North Solar Farm Limited to address the matters raised, including through the provision of further information, ecological and cultural monitoring, and the development of consent conditions that enable ongoing mana whenua involvement in project operations and the protection and enhancement of cultural values, should consent be granted.

Nāku noa nā,



Maru Rout

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Appendices:

Appendix One – Map of takiwā of Ngāi Tahu

Appendix Two – Crown Apology to Ngāi Tahu

Appendix Three- Statutory Acknowledgement- Te Ao Marama (Lake Benmore)

Appendix Four- Taonga Species Schedule

Appendix Five- Cumulative effects- Table of Solar Farm Projects