



TE AO MĀRAMA INC.

20 March 2026

Southland Wind Farm Project
Private Bag 63002
Waterloo Quay
Wellington 6140
Via email: substantive@fasttrack.govt.nz

Tēna koe

FTAA – 2504 – 1095: Southland Wind Farm : Comment on Draft Conditions requested under Section 70 of the Fast-Track Approvals Act 2024

Thank you for giving notice of the invitation to comment on the Conditions of consent of the Southland Wind Farm application under Section 70 of the Fast-Track Approvals Act 2024. We acknowledge that comments are due on 23 March 2026.

Te Ao Mārama Inc. provide comments on behalf of Ngāi Tahu ki Murihiku, the kaitiaki rūnanga whose takiwā includes the site the application is within. Ngāi Tahu ki Murihiku consists of Te Rūnanga o Awarua, Hokonui Rūnanga, Te Rūnanga O Oraka Aparima and Waihōpai Rūnanga hold mana whenua status within this rohe.

The Te Rūnanga o Ngāi Tahu Act 1996 (the TRONT Act) and the Ngāi Tahu Claims Settlement Act 1998 (the Settlement Act) give recognition to the status of Papatipu Rūnanga as kaitiaki and mana whenua of the natural resources within their takiwā boundaries.

As recorded in the Crown Apology to Ngāi Tahu, the Ngāi Tahu Settlement marked a turning point and a beginning for a “new age of co-operation”. In doing so, the Crown acknowledged the ongoing partnership between the Crown and Ngāi Tahu and the expectation that any policy or management regime would be developed and implemented in partnership with Ngāi Tahu.

Ngāi Tahu Claims Settlement Act 1998 – Principles and Provisions

The Fast Track Approvals Act 2024 requires applicants to identify the relevant principles and provisions of Treaty Settlements. These are the foundations and guiding concepts of what the Ngāi Tahu Settlements are based on. There are a number of principles and provisions contained within these Settlements.

Te Ao Marama Inc considers the following key principles are required to be recognized by this application at this stage of the Fast Track process (but not limited to):

- Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā.
- The Crown and agents of the crown must act in good faith.

- All areas and places within the Ngāi Tahu takiwā are important and form part of an entwined network of values, places and resources which are relevant to Ngāi Tahu tribal history, contemporary values and the future of the tribe.
- Settlement provided a basis for continuing evolution from which Ngāi Tahu can express its ancestral relationship with the Ngāi Tahu takiwā into the future.

We can confirm the applicant has received advice on the above and has referenced consideration of those in the continued engagement with Ngāi Tahu entities and overall design of the project during this final stage in the processing of this application.

Substantive Application - Comment on Draft Conditions

Overall, the purpose of this letter of comment is to preserve the ability for Ngāi Tahu ki Murihiku (via Te Ao Mārama) to be involved in potential changes to established and agreed conditions.

In summary we consider both **Appendix B - Draft Consent Conditions (24 February version)** and **Draft Appendix F- Archeological Authority – Southland Wind Farm – Archeological Authority Conditions** as proposed by the EPA to reflect Contact Energy’s long-term engagement and agreement that has occurred between Ngāi Tahu ki Murihiku and the applicant. These conditions address the impact of the proposed activity on the identified cultural values outlined in the Cultural Impact Assessment (**attached to the applicants ‘Overarching Substantive Application Document’ at page 21**). To change these conditions at this final stage would undermine the relationship and mitigation measures put in place to address the concerns of iwi. We therefore request that should any other changes occur Ngāi Tahu ki Murihiku is actively engaged and consulted.

We reserve the right to provide further comment as required.

Nākau noa nā



Dean Whaanga
Kaiwhakahaere Kaupapa Taiao



**TE AO
MĀRAMA INC.**

CC: Ngā Rūnanga – Papatipu Rūnanga Chairs