

BEFORE THE PANEL CONVENER

IN THE MATTER

of the Fast-Track Approvals Act 2024 (FTAA)

AND

IN THE MATTER

of an application by Nova Energy Limited under
section 42 of the FTAA for the construction of a
solar farm

APPLICATION NO.

FTAA-2604-1217

TE RŪNANGA O AROWHENUA RESPONSE TO MINUTE THREE OF THE PANEL CONVENOR

22 July 2028

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Introduction

1. This formal report is prepared by Aoraki Environmental Consultancy Limited (AECL) on behalf of Te Rūnanga o Arowhenua (Arowhenua) in response to Minute 3 of the Panel Convener dated 15 July 2026 (Minute), regarding the Nova Energy Limited application (FTAA-2604-1217) for a solar array farm near Twizel township.
2. Arowhenua is a principal hapū of Ngāi Tahu, acknowledged in Te Rūnanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 (Settlement Act). The takiwā of the hapū is centred at Arowhenua and extends from the Rakaia River in the north to the Waitaki River in the south, thence inland to the Main Divide sharing an interest with Te Rūnanga o Waihao and Te Rūnanga o Moeraki. Within this area, Arowhenua has maintained noho tūturu (ahi kā), meaning the tribe's 'fires' have been kept burning and that they actively exercise rangatiratanga.
3. AECL are mandated by Arowhenua to provide advice and act on its behalf in respect of environmental policy, planning and strategy matters. This includes representation on proposals being processed under the Fast-track Approvals Act 2024. A representative of AECL is available to attend the scheduled conference alongside a representative from Aukaha Limited and Te Rūnanga o Ngāi Tahu (Ngāi Tahu).
4. The Minute seeks participants views prior to a Convener's Conference on 29 July 2026, that will inform decisions of the Convener regarding:
 - a) Appointment of panel members.
 - b) The timing of the panel decision.
 - c) Matters to consider when preparing for conference.

Issue (a) - Appointment of Panel Members

5. Arowhenua consider it is highly desirable that at least one member of the panel have expertise in Ngāi Tahu tikanga, given the significance of Lake Benmore, Ōhau River, Whakatipu/Twizel River, and the wider Waitaki area to the iwi and the centrality of tikanga to the approach adopted by Arowhenua.
6. AECL notes:

The application site adjoins three Sites and Areas of Significance to Māori (SASM) under the Mackenzie District Plan. These include:

- a) SASM19 – Lake Benmore (Statutory Acknowledgement Area under the Ngāi Tahu Claims Settlement Act 1998),
 - b) SASM46 - Ōhau River, and
 - c) SASM35 – Whakatipu/Twizel River.
7. A description of each SASM and their associated values can be found within SASM-SCHED1 and SASM-SCHED2 of the Mackenzie District Council's EPlan. Information outlining the cultural landscape and the historical mapping tools used by Arowhenua and Ngāi Tahu to identify these sites and areas is deemed sensitive information that will need protecting.
8. Ngāi Tahu manage the list of potential candidates on behalf of the Iwi. AECL is happy to work with Ngāi Tahu and other s53 parties (local councils) to confirm a suitable nomination.

Issue (b) – Timing of Panel Decision

9. At the time of writing, the Applicant's views on timing were not available. AECL recognise that the Fast Track process is largely driven by the Applicant; therefore, it is up to the Applicant to set realistic time frames.
10. In AECL's experience with FTAA-2509-1100 and FTAA-2508-1097, the default timeframes are not sufficient, particularly with regards to accommodating additional information requests and enabling open and constructive engagement between the Applicant and mana whenua given the legal, factual and evidential complexity stemming from the technical nature of the material. A direct consequence of this was the need for the Applicant to suspend the process to enable the additional information to be collated, analysed and circulated.
11. AECL are cognisant of the time allocated for the steps in the second half of the table in Schedule 1 – specifically, from the point that draft conditions are provided to participants (s70). AECL have attempted to create a schedule based on the timeframes experienced with FTAA-2509-1100 and FTAA-2508-1097, which is attached as Appendix 1 to this response. If the application is approved, the refinement of conditions will be critical.
12. AECL also notes that Department of Conservation, Mackenzie District Council, Canterbury Regional Council and Ngāi Tahu staff and experts are all involved in a range of other FTAA applications. Availability of relevant participants will therefore need to be factored into the timeframe. It is AECL's experience that at least 20 working days will be required from the date draft conditions are provided to the step of issuing a decision.

13. In addition to the above, AECL suggests the Convener considers the following aspects:
- a) Due to the number of Fast Track applications currently within the processing system, the availability of technical experts to prepare additional information and/or comment on technical information has become a concern. The limited resourcing available is an issue for the Applicant, s53 parties and the Expert Panel.
 - b) Following on from (a) above, complexities associated with conflicts of interest may be of concern. AECL anticipates that the Expert Panel will be mindful of this issue and more than capable of managing; however, the Applicant may need to consider this issue carefully if additional information is sought by the Expert Panel.
14. AECL along with Ngāi Tahu and Aukaha have provided feedback on the draft conditions. The draft suite of conditions submitted with the substantive application will require further refinement to satisfy the interests of mana whenua. AECL, Ngāi Tahu and Aukaha are willing to continue working with Nova Energy to establish a suite of conditions that are fit for purpose.
15. AECL therefore considers that additional time will be necessary beyond the statutory defaults, in accordance with s79(2), and is open to discussing this further at the conference.

Schedule 2 – Matters to Consider when Preparing for Conference

Tikanga

16. The tikanga relevant to the application has not been identified in the application prepared by Nova Energy; therefore, AECL would like to record the following Arowhenua tikanga:
- a) The Waitaki lies under the cloak of mana whenua rangatiratanga and is cared for and managed by mana whenua to the greatest extent possible, in a manner consistent with kaitiakitanga. The Waitaki Catchment remains of paramount importance to Ngāi Tahu. As mana whenua, Arowhenua have a responsibility to assess how the proposed solar farm impacts their rights, values and practices;
 - b) Mana whenua firmly believe that the lands and waters of the Waitaki need to be restored, enhanced and protected. Their concern is that a narrow focus on the need to generate renewable energy without considering cumulative effects arising from existing hydro infrastructure and other solar array farm proposals in the Waitaki Catchment, could result in further alienation of Arowhenua from their ancestral lands. Large scale solar farms could also significantly restrict many options for restoration and enhancement of mahika

kai resulting in connections with whenua and wai in the catchment as a whole, being lost or limited; and

- c) Also acknowledging that the approach of mana whenua to this application reflects the desire of Arowhenua to fulfil obligations and responsibilities to the whenua to the extent currently possible given the existence of the adjoining hydro power schemes and the modification of the catchment.

17. Arowhenua are also very conscious of the need to enable future generations to thrive in the catchment.

"Ko tā te Waitaki mahi he manaaki i te motu"

"The generosity of the Waitaki provides for the nation"

18. Tikanga still provides important context for their interest in the catchment and involvement in this application process (along with the importance of the proposed conditions of consent) but Arowhenua ultimately see the separate Kawenata as a key means of giving effect to the matters set out above. The Kawenata itself will not be produced in evidence.

Cumulative Effects of Multiple Solar Farms in Te Manahuna

19. It is noted that when FTAA-2509-1100 and FTAA-2508-1097 were lodged with the Environmental Protection Agency (EPA), no other solar farm applications within the southern portion of Te Manahuna had been applied for or consented. As of 23 July 2026, several applications exist within the Fast Track system and the standard Resource Management Act 1991 (RMA) process. These are as follows:

- Lodestone Energy Limited (Haldon Solar – 320 ha) FTAA-2508-1097 has been provisionally granted by the Fast Track Expert Panel with comments received on draft conditions;
- Far North Solar (The Point – 678 ha) FTAA-2509-1100 is quite some way through the process;
- Nova Energy Limited (Twizel Solar – 868.12 ha) FTAA-2604-1217 substantial application has been submitted and accepted by the EPA;
- Helios Energy Limited (Grampians Solar – 574 ha) referral application has been accepted;
- Twizel Solar Farm Limited's (Mr Douglas McIntyre – 653 ha) has submitted a resource consent (201.2026.2809) with the Waitaki District Council for a solar farm at 2411 and 2413

Twizel-Ōmārama Road, Twizel. The application was publicly notified with submissions closing on 20 July 2026. A hearing is still pending; and

- Kakariki Renewables (Grays Hill Station – 2,100 ha) have yet to determine whether they will submit the application under the Fast Track system or to the Mackenzie District Council under the standard RMA process.
20. A map identifying the location of the granted and proposed solar farms within the southern portion of Te Manahuna is attached as Appendix 2 to this Minute response. The combined area of the six solar farms is approximately 5,193.12 ha. At least three other solar farms are proposed for Te Manahuna, with Far North Solar proposing an additional solar farm between Lake Ōhau and Lake Ruataniwha, west of Twizel.
21. Given the number of solar farms proposed for the southern portion of Te Manahuna, it is recommended that the cumulative effects of such large solar arrays be considered by the Expert Panel.

Substantive Application - Mana Whenua Report

22. It is noted that the Applicant submitted with their substantive application the incorrect Mana Whenua Report prepared jointly by Ngāi Tahu, AECL and Aukaha planning representatives. The report submitted was an older version prepared for the Referral Application. The correct report is attached as Appendix 3 to this Minute response. The Mana Whenua Report sets out the environmental concerns Mana Whenua believe still need to be worked through as well as the draft suite of conditions recommended by Ngāi Tahu, AECL and Aukaha.

Conclusion

23. An AECL representative on behalf of Arowhenua will be happy to elaborate further on any of the above points at the conference set for 29 July 2026.
24. AECL confirms the willingness of both Arowhenua and the AECL representative to engage directly with the Applicant and Panel as necessary to advance the progress of the application.

Dated: 22 July 2026



Ally Crane
General Manager

APPENDIX 1: PROPOSED FAST TRACK SCHEDULE

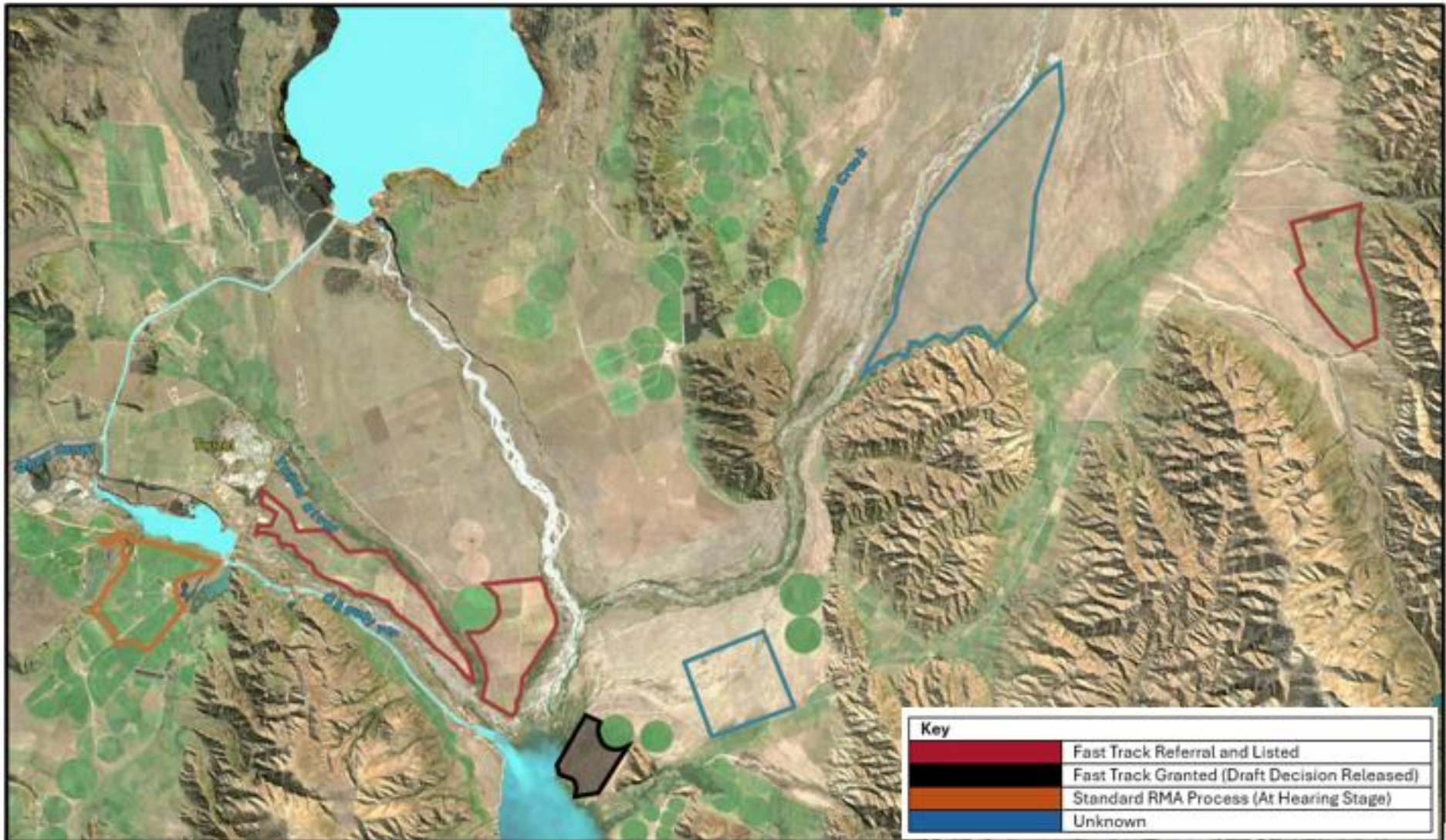
Task	Working days	Twizel Solar Farm (proposed timing)	Comments
Panel commencement	31 August 2026 (nominal)	25 working days 3 September 2026	This allows approximately 25 working days (excluding the day of the conference and the panel commencing the day after the 25 working days). This time will allow for engagement to continue with applicant to try to work through some of the outstanding issues/matters.
Invite comment from relevant parties	10 working days later	10 working days	
Comments close	20 working days later	20 working days	
Comments close for applicant	5 working days later	5 working days	Note- the applicant can request a suspension to the application to better work through and respond to comments (if needed)
Any other procedural steps, evaluation and decision writing	20 working days later	30 working days	Note- for both of the current solar farm applications ^[1] there have been numerous s67 requests for further information, with some subsequent input/ opportunities to comment provided to s53 parties as well as the applicant and other relevant parties. There have also been independent experts appointed by the Panel to inform evaluation and decision making. There are also substantive volumes of information and procedural steps (under the FTAA 2024). The panel will need to work through to write the decision.
Draft Decision to Approve			
Draft decision and conditions to Ministers	5 working days later	5 working days	
Response from Ministers	10 working days later	10 working days	
Applicant response to Ministers comments (if any)	5 working days later	5 working days	
Draft conditions and decision to participants	5 working days later	5 working days	
Participant comments on draft conditions	5 working days later	15 working days	Note- if there haven't been direct discussions on the draft conditions this provides additional time for some further engagement (i.e. between the participants and the applicant) prior to putting in comments on draft conditions.
Applicant response to participants on conditions	5 working days later	5 working days	
If not agreed, procedural step in relation to draft conditions.	10 working days later	15 working days	Allows time for a workshop to be held or other types of engagement between participants and the applicant to try to work through outstanding matters.
Evaluate and finalise decision	5 working days later	5 working days	
Decision release	5 working days later	5 working days	
TOTAL		135 Working days	Note- this excludes the 25 working days provided for the panel to commence. This total appears to better align with timings observed for the two current solar farm applications ^[2] .

[1] Haldon Solar and The Point Solar Farm

[2] 80 working days total was allowed for a decision for each, but with the inclusion of suspensions to the application, both have exceeded 130 WD to date. If the applicants did not suspend the application, it would have likely made it extremely difficult for the respective Panels to get to the point in the process each application is at today. It is understood that during these suspensions, the Panels have been able to use the time to continue their work.

APPENDIX 2:

LOCATION OF APPROVED AND PROPOSED SOLAR FARMS WITHIN SOUTHERN TE MANAHUNA



APPENDIX 3: COPY OF THE MANA WHENUA REPORT PREPARED FOR SUBSTANTIVE APPLICATION

MANA WHENUA REPORT

For Nova Energy Limited

Prepared By:

Aoraki Environmental Consultancy Limited, Aukaha and Te Runanga o Ngai Tahu on behalf of Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki

May 2026



NOVA ENERGY LIMITED SOLAR FARM SUBSTANTIVE APPLICATION UNDER THE FAST TRACK APPROVALS ACT 2024

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Date: 19 May 2026

Reference: Nova Energy Limited Solar Farm Substantive Application
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Use and Reliance

This Manawhenua Report has been prepared by Aoraki Environmental Consultancy Limited, Aukaha and Te Rūnanga o Ngāi Tahu on behalf of Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki under the specific instruction of Nova Energy Limited. It is solely for Nova Energy Limited's use and for the purpose of their substantive application under the Fast Track Approvals Act 2024 (FTAA) in accordance with the agreed scope of work.

This report provides input and feedback on the cultural impacts of the solar farm located at Lot 3 DP 422901.

Aoraki Consultancy Limited, Aukaha and Te Rūnanga o Ngāi Tahu do not accept any liability or responsibility in relation to the use of this report contrary to the above, or to any person other than Nova Energy Limited. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by Nova Energy Limited or obtained from other external sources, it has been assumed that it is accurate, without independent verification, unless otherwise indicated. No liability or responsibility is accepted by Aoraki Environmental Consultancy Limited, Aukaha or Te Rūnanga o Ngāi Tahu for any errors or omissions to the extent that they arise from inaccurate information provided by Nova Energy Limited or any external source.

EXECUTIVE SUMMARY

Nova Energy Limited (Nova) have commissioned Aoraki Environmental Consultancy Limited (AECL), Aukaha 1997 Limited (Aukaha) and Te Rūnanga o Ngāi Tahu (TRoNT) to prepare a Manawhenua Report on behalf of Te Rūnanga o Arowhenua (Arowhenua), Te Rūnanga o Waihao (Waihao) and Te Rūnanga o Moeraki (Moeraki) to assist in the preparation of a substantive resource consent application to the Environmental Protection Agency (EPA) under the Fast Track Approvals Act 2024 (FTAA) for the installation of a solar array farm on a 868 ha site located at Lot 3 DP 422901.

This Manawhenua Report will assist Nova to meet their statutory obligations under various legislation including the Resource Management Act 1991 (RMA) and the FTAA.

The purpose of this report is to identify significant areas and sites that may be affected by the proposed solar farm and assess the values and potential impacts of the activity on these values.

This Mana Whenua Report includes:

- A description of Nova Energy site and proposal;
- Identifications of the relevant Iwi Management Plans;
- An explanation of who Kāi Tahu and Papatipu Rūnaka are, their links to Te Manahuna and their relationship to the site; and
- An assessment of the effects the proposal will have on the relationship Papatipu Rūnaka have with their ancestral lands and waters.

This Mana Whenua Report is based on a consultative process that enabled Te Rūnanga o Ngāi Tahu, Arowhenua, Waihao, and Moeraki to assess the FTAA consent application for the Twizel Solar Farm and to provide feedback on the cultural impacts of the proposal.

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Nā Te Pō, Ko Te Ao	From eternity came the Universe
Nā Te Ao, ko Te Ao Marama	From the Universe, the bright clear light
Nā Te Ao Marama, ko Te Ao Tūroa	From the bright clear light, the enduring light
Nā Te Ao Tūroa, ko Te Kore Tē Whiwhia	From the enduring light, the void unattainable
Nā Te Kore Tē Whiwhia, ko Te Kore Tē Rawea	From the void unattainable, the void intangible
Nā Te Kore Tē Rawea, ko Te Kore Tē Tāmaua	From the void intangible, the void unstable
Nā Te Kore Tē Tāmaua, ko Te Kore Matua	From the void unstable, the void endowed with paternity
Nā Te Kore Matua, ko Te Mākū	From the void of paternity, came moisture
Nā Te Mākū, ka noho i a Mahora nui-ātea	From moisture, came limitless thought
Ka puta ki waho ko Raki	Then came the visible heavens
Nā Raki, ka noho i a Poko hārua te -pō	The visible heavens combined with the great abyss to produce the numberless sorceries and the ultimate calamity!!!
Ka puta ko Aoraki, ko Rakamamao, ko Tāwhirimatea	Thence to Aoraki and the winds and weather
Ko Tū Te Rakiwhanoa	To the creator of the land
Uira ki Te Mahānui a Maui	And the canoe of Māui
Ko Te Ao Takata	And finally, to people
Tihei mauri ora!	I cough the breath of life!
Ko te kākahu o te mauka o Aoraki	To the cloak that covers the mountain,
Aoraki me tōna whanau o Rakirua, Rakiroa, Rārakiroa	To the family and brothers
Nā te mauka o Kakīroa me Horokoau	Over to Mt Sefton and Mt Tasman
Ko te whanau o Kā Tiritiri o Te Moana	And to the rest of the family of the Southern Alps
mai i te tane a Haupapa	To the male side of the Tasman Glacier
ki te taha wahine a Aroarokaehe	And to the female side and the Hooker Valley
Huri noa ki te awa tapu ki Kā Roimata o Aoraki	Then over to the source of the “Tears of Aoraki”
Nā te roto o Pūkaki, ko te roto tapu o Takapō	And on to the sacred lakes of Pūkaki and Takapō
Ko te roto o Ohou, ko Te Manahuna te whenua	And to Lake Ōhau and the valley of Te Manahuna

Ki kā huarahi ki te tihi o te mauka o Te Rua
Taniwha

mai i Te Ruataniwha ki Te Ao Marama!

Nā te wharenuī o Te Whakaahua-a-raki nō Te
Maiharoa

Te Maiharoa Ko Te Poho o Rakitāmau,

Mai i Te Kai Hikihiki, ki Ōtamatākou,

Ki Te Wharekuri, ki Te Awakino

mai i Te Kohurau, ko Oteake

mai i Ote kai ake, ko Te Maerewhenua

mai i Te Awamoko, ki Te Puna o Maru

ko Korotuaheka te kaika tūturu, i tū ai te whare
Tapu o Matiti

And travelling the ancient path to the
mountain,

And then to the world of light, Te Ao Marama

And on to the place of the whare of the chief,

And the burial mound on Māori Hummock

And on to Otematata

And Te Wharekuri and Te Awakino

And the mountain Te Kohurau and the place,
Oteake

And Ote kai ake and Duntroon

On to Te Awamoko and the settlement of Te
Puna a Maru

And finally arriving at the Waitaki River mouth
and the house Matiti

David Higgins (Upoko for Moeraki) and Tewera King (Upoko for Arowhenua and Waihao)



1. PURPOSE OF THIS REPORT

The purpose of this Mana Whenua Report is to assist Nova Energy Limited (Nova) to meet their statutory obligations under the Fast Track Approvals Act 2024 (FTAA), Resource Management Act 1991 (RMA), and Department of Conservation (DOC) Wildlife Act 1953. The report provides:

- A brief overview of the proposed project;
- An explanation of who are mana whenua and Papatipu Rūnaka for the project.
- A brief description of the relevant Iwi Management Plans;
- An explanation of the relationship of Kāi Tahu to Te Manahuna and the application site;
- An assessment of the effects of the activity on the relationship Kāi Tahu have with their ancestral whenua and wai māori within Te Manahuna.

This report builds on the earlier, broader Mana Whenua Report¹ prepared for Nova's Referral Application. It incorporates more detailed project information developed for the substantive application, including site surveys, monitoring, expert assessments, draft conditions, and associated management plans. It also draws on consultation undertaken by Nova during the pre-application phase of the solar farm project.

This report outlines Mana Whenua perspectives, including key issues, and, where applicable, identifies mechanisms to address potential effects. In doing so, it reflects the positions and views expressed through pre-application consultation.

It is intended that this report will be appended to the substantive application, with relevant matters embedded within the application documents, including through the development of environmental management approaches and consent conditions.

Assessment Approach and Limitations

This assessment is based on information available to Mana Whenua at the time of writing, including draft project designs, technical reports, site monitoring and surveys, and initial engagement outcomes.

It is anticipated that some matters identified in this report will be addressed through the adoption of consent conditions, the development of associated management plans, and the establishment of an enduring working relationship between Mana Whenua and Nova for the life of the project. Accordingly, the conclusions reached may continue to evolve as the project progresses through the substantive application process

2. TOITŪ TE MANA, TOITŪ TE WHENUA

This report has been prepared on behalf of Te Rūnanga o Arowhenua (Arowhenua), Te Rūnanga o Waihao (Waihao) and Te Rūnanga o Moeraki (Moeraki) who for the purposes of this report are collectively referred to as Kāi Tahu. These three Papatipu Rūnaka represent the interests of Kāi Tahu whānui who are mana whenua and hold rakatirataka within their takiwā. Mana whenua as kaitiaki for Te Manahuna hold rights and obligations, including an obligation to assess how any activity in their takiwā impacts upon the environment and on cultural values and practices.

¹ Dated February 2025

2.1 Te Rūnanga o Arowhenua

Te Rūnanga o Arowhenua (Arowhenua) have lived on the fertile coastal plains of mid and south Canterbury for hundreds of years, venturing up the river valleys into the mountains of the takiwā, crossing the passes inland to the many lakes or over to Te Tai Poutini (West Coast). Their travels were dictated by their knowledge of where food, water and other resources could be found at particular times of the year. The ancestors of Te Rūnanga o Arowhenua carried little. They were entrusted to care for their takiwā and are owners by customary right. They have a strong sense of 'tūrangawaewae' where one belongs and has a right to stand as their ancestors stood before them. Thus, ensuring a responsibility for looking after their whenua, wai and the resources they sustained.

Arowhenua, comprise people of Ngāi Tahu, Ngāti Māmoe, Rapuwai, Hawea and Waitaha descent. The takiwā of Te Rūnanga o Arowhenua extends over the area from the Rakaia Catchment in the north to the Waitaki Catchment in the south, inland to the Main Divide and seaward across the exclusive economic zone. Arowhenua hold mana whenua status over Te Manahuna.



Figure 1: Arowhenua Marae and the Whareniui, Te Hapa o Niu Tirenī

2.2 Te Rūnanga o Waihao

The name Waihao refers to the Waihao River, named by Rokohouia the son of Rākaihautu. Both Rākaihautu and Rokohouia were ariki of the waka Uruao, one of the earlier waka arrivals to Aotearoa. The river, which has its source in the inland foothills, Te Tari a Te Kaumira (Hunter Hills) is home to the hao or shortfin eel, hence the name Waihao. The hao eel was, and still is, one of the delicacies still gathered as mahinga kai by whānau from the Waihao River and the Wainono lagoon, the kete kai of local Māori.

Waihao has a strong and inherent relationship with all areas of their takiwā and a duty to protect the historic and contemporary values present, including wāhi tapu, wāhi taoka, mahika kai, and other natural resources, for the benefit of whānau. Te Rūnanga o Waihao (Waihao) hold whakapapa rights over Te Manahuna.



Figure 2: Waihao Marae

2.3 Te Rūnanga o Moeraki

The takiwā of Te Rūnanga o Moeraki (Moeraki) centres on Moeraki and extends from the Waitaki to the Waihemo (Shag River), and inland to Kā Tiritiri o te Moana (Main Divide). This includes shared interests with other Papatipu Rūnaka in Te Manahuna (Mackenzie Basin) and Tuawhenua (Queenstown Lakes and Central Otago). Moeraki hold whakapapa rights over Te Manahuna.



Figure 3: Moeraki Marae, Uenuku

2.4 Mana Whenua Regional Environmental Entities

Aoraki Environmental Consultancy Limited (AECL) is a not-for-profit organisation mandated by Arowhenua to provide advice and act on its behalf in respect of all environmental policy, planning and strategy matters. This includes representation on proposals being processed under the Fast-Track Approvals Act 2024 (FTAA).

Aukaha 1997 Limited (Aukaha) is a not-for-profit organisation mandated by Waihao and Moeraki to provide advice and act on their behalf in respect of all environmental policy, planning and strategy matters. This includes representation on proposals being processed under the Fast-Track Approvals Act 2024 (FTAA).

The planning staff of AECL, Aukaha and Te Rūnanga o Ngāi Tahu (TRoNT) are working together closely to represent the interests of Arowhenua, Waihao, Moeraki and TRoNT on the Fast Track projects located within Te Manahuna.

3. RELATIONSHIP OF KĀI TAHU TO TE MANAHUNA

3.1 Kāi Tahu Pūrākau

Kāi Tahu pūrākau begin with Aoraki and the creation of Te Waipounamu (South Island). Aoraki is of immense cultural, spiritual and traditional significance to Kāi Tahu Whānui. Aoraki is at the heart of Kāi Tahu creation traditions and is central to their whakapapa and identity. Aoraki is the most sacred of Kāi Tahu tūpuna (ancestors), from whom mana whenua descend.

The story of Aoraki and his brothers has been passed down through many generations of our people and has endured as a creation mythology of high importance to Kāi Tahu. This creation story of the landscape surrounding Arowhenua is a central tradition for the Waitaha, Rapuwai, Kāti Hāwea, Kāti Māmoe, and Kāi Tahu tribes from which the local hapū (Arowhenua, Waihao and Moeraki) descend. It is largely on this basis, and as the principal marae in the region, that the Arowhenua, Waihao and Moeraki assume responsibility as kaitiaki (guardians) of Aoraki/Mt Cook and the surrounding area.

The history of the land goes back to about 850 AD when, according to tradition, Rākaihautu came to Te Waipounamu (South Island) from Hawaiki in the canoe Uruao. The canoe landed at the boulder bank at Nelson. While his son Te Rākīhouia took some of the party down the east coast, Rākaihautu led the remainder through the interior to Foveaux Strait. With his digging stick, Rākaihautu dug Te Kari Kari O Rākaihautu (the southern lakes). Te Rākīhouia proceeded south in Uruao down the Canterbury Coast where he placed eel weirs at the mouths of rivers. The posts he left behind became known as Nga Pou Pou O Rākīhouia. The two parties met up at Waihao, then proceeded up the coast, making their headquarters at Akaroa. Rākaihautu was buried at Wai Kakahi (near Wairewa/ Lake Forsyth). Te Uruao lies as part of the Waitaki Riverbed near Wai Kakahi (near Glenavy).

Kāi Tahu traditions link mana whenua to their tūpuna and the cosmological world of the gods. These histories reinforce tribal identity and connection between generations, documenting the events which shaped the environment of Te Wai Pounamu and Kāi Tahu as an iwi. At the centre of these traditions is Aoraki the mauka atua.

3.2 Mana Whenua Values and Interests

Kāi Tahu does not see their existence as separate from te ao tūroa (the natural world), but as an integral part of it. Through whakapapa, all people and life forms descend from a common source. Whakapapa

binds mana whenua to the mountains, forests and waters and the life supported by them, and this is reflected in traditional attitudes towards the natural world and resource management.

Whanaukataka embraces whakapapa, through the relationship between people, and between people and the environment. The nature of these relationships determines people's rights and responsibilities in relation to the use and management of taoka of the natural world.

For Arowhenua, Waihao and Moeraki tūpuna, a way of life developed that was strongly focused on the harvesting of mahika kai from the natural environment. Mahika kai encompasses the gathering of food and natural materials in accordance with tikaka, the places where those resources are gathered, and the work, methods and cultural activities involved in obtaining them. Natural resources were used to feed, clothe, and equip people. Within Te Manahuna the gathering of natural resources was managed by strict kawa (resource management protocols and practices) and observance to tikanga.

Over time, Kāi Tahu tūpuna developed an extensive knowledge of the place names, stories, food resources and nohoaka of Te Manahuna. Physical landmarks were often associated with atua (gods) and with the births, lives, and deaths of tūpuna (forebears). Many of the hills and mountains bear the names of the waka (canoes) and the crew members important to the hapū of Arowhenua, Waihao and Moeraki. Many of the rivers, lakes and plains are named to represent the movements and marks upon the land of these ancestral vessels and people. Smaller hills and rivers often bear names of later people and events from the history of hapū or of whānau.

The places and their names were part of the mātauraka held by Kai Tahu tūpuna in which religious beliefs, history and geography were combined. Kāi Tahu tūpuna would have been able to find their way around the vast and varied Te Manahuna landscape with ease from their knowledge of the tribal traditions and histories. Today, knowledge of these traditional cultural narratives and landscapes is maintained by kaumatua (elders) and whanau. Therefore, for Arowhenua, Waihao and Moeraki, the recognition and protection of significant cultural landscapes is imperative.

3.3 Kāi Tahu Relationship to Te Manahuna

While Te Ao Marama (Lake Benmore) and Ruataniwha are man-made lakes, the area is one of the most culturally significant areas for Kāi Tahu and specifically Arowhenua, Waihao and Moeraki whānau.

Papatipu rūnaka have lived on the fertile coastal plains of mid and south Canterbury and the inland basin of Te Manahuna/Mackenzie Basin for hundreds of years, venturing up the river valleys into the mountains of the takiwā, crossing the passes inland to Te Manahuna, or over to Te Tai Poutini (West Coast) to access and process mahika kai. The waters that flow from Aoraki and Kai Tiritiri-o-te-moana (the Southern Alps) supported the substantial mahika kai of Te Manahuna, which drew Kai Tahu tūpuna to the area on a seasonal basis. Their travel was dictated by the knowledge of where food, water and other resources could be found at particular times of the year.

It was the natural resources that attracted Kai Tahu tūpuna to Te Wai Pounamu, and the harvesting of those resources is what kept them there. The distinctive resources of birds, eel, fish and other wildlife bound the people to the land and to the waters and strengthened their will to hold on to them as well as learn and pass on mātauraka in whare wānaka.

Lake Ōhau is a glacial lake in Te Manahuna (the Mackenzie Basin), fed by Te Awa Aruhe (Hopkins River) and Ōtaao (Dobson River). Ōhau is renowned for the north-west wind that blows over the lake. Ōhau along with nearby lakes Pūkaki and Takapō (Tekapo) formed part of the Kāi Tahu and papatipu rūnaka seasonal food gathering patterns and was renowned for tuna (eels) and weka that were gathered and

preserved for the upcoming winter months. Lakes Ōhau was the location of kāika nohoaka (traditional villages used seasonally) sites, māori rock art and culturally sensitive areas

Prior to the creation of the hydro schemes and canals, Lake Ōhau was the beginning of the Waitaki River, which flowed from Lake Ōhau to the Pacific Coast. The entire reach of the Waitaki River from Lake Ōhau to the coast has a large number of cultural sites, most of which are now under water.

The Waitaki River (from Lake Ōhau to river mouth) is of such cultural significance that up to 10 Papatipu Rūnaka can whakapapa to it; however, at present, only Arowhenua, Waihao and Moeraki are actively involved in its management.

The protection of Te Manahuna is a priority for Kai Tahu and Papatipu Rūnaka, including avoiding further intensification of agriculture and industry and further reductions in surface and groundwater quality. The expansion of irrigation and intensification of farming has impacted on water quality, resulting in the serious decline of water quality in the Ōhau and Twizel Rivers, increasing nitrate levels in groundwater and the adjoining lakes, and consequential impacts on the health of indigenous flora and fauna.

4. THE SITE

The project site is located on the eastern side of State Highway 8 (SH8) and the Twizel township. The relatively flat site is approximately 868 ha in area, and the proposed solar farm is to be located entirely within one land parcel, being Lot 3 DP 422901.

The site (refer to Figure 4 below) is bounded by the Twizel and Ōhau Rivers. The Twizel River has its origins in numerous streams which flow down the eastern flanks of the Ben Ōhau Range, the longest of which are the Gladstone Stream and the Duncan Stream. The Twizel River flows south, veering slowly southeast close to the town of Twizel. From there it flows into the northern end of Lake Benmore.

The Ōhau River is a short river, some 8 km long, that links Lake Ōhau with Lake Ruataniwha. Downstream of Lake Ruataniwha, the Ōhau River is dry except for releases of water from the hydro generators. Until the construction of the Waitaki River hydroelectric project, it was a significant tributary of the Waitaki River.

The Twizel Solar property is located on the old Pūkaki River outwash plain that is typically dry even after heavy rain. There are no flowing streams within the property itself. The property also lies within the Pūkaki groundwater sub-catchment. The receiving environment for the groundwater from this sub-catchment is the northern part of Lake Benmore.



Figure 4: Site location. Source: Canterbury Maps.

Historically, the property has been run as a low intensity high country run with some minor cropping. Up until 2019, under the previous landowner's ownership, the property was sown in Ryecorn, with cattle grazing from June through to November. A quarry located in the northwest boundary of the site appears to be still functioning at a low scale. Nova notes that the quarry does not form part of the solar farm project.

An oxidation pond is located on adjoining land owned by the Mackenzie District Council Land, approximately 750 m from the northwest corner of the site.

5. NOVA ENERGY SOLAR FARM PROPOSAL

5.1 Project Overview

Based on a review of the draft Substantive Application, the Project comprises the construction, commissioning and operation of a solar plant and associated infrastructure at the site including connection to the national grid at the Twizel substation. The site layout for the solar plant is shown in Figure 5 below.

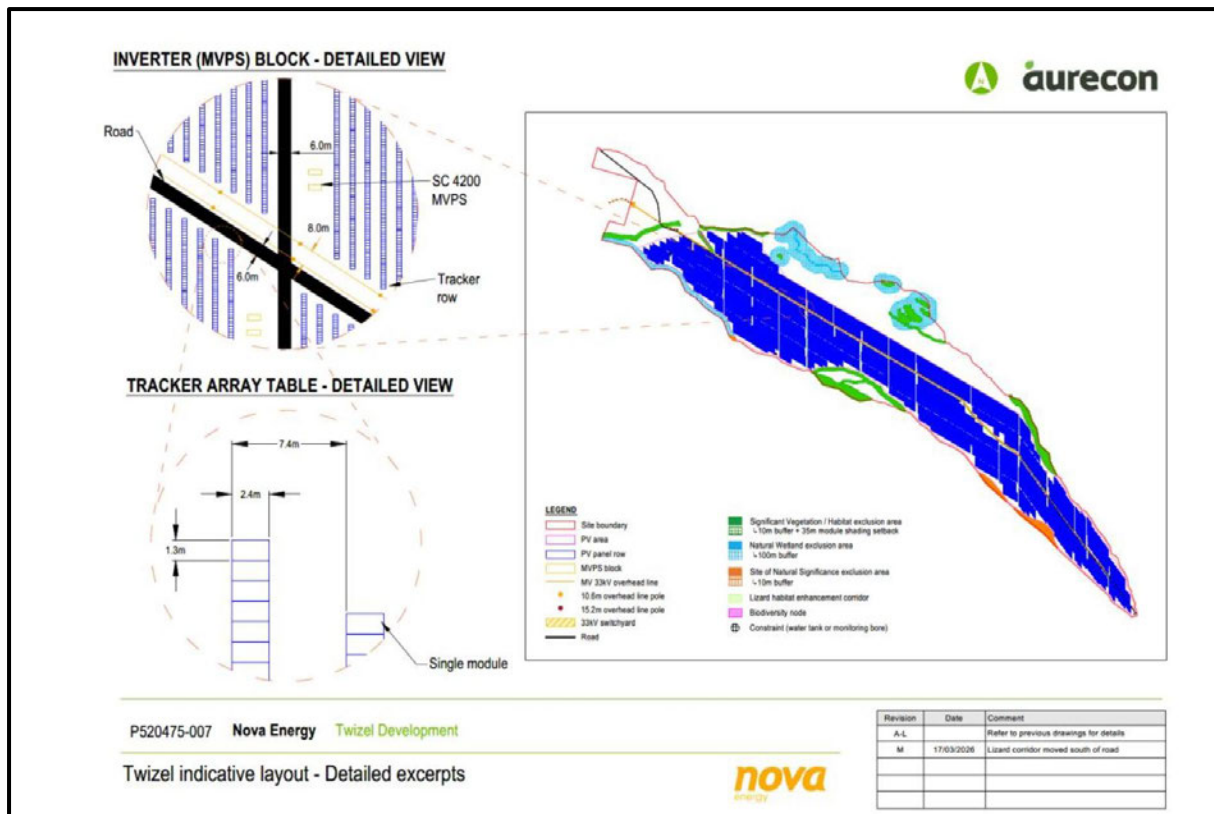


Figure 5: Indicative layout. Source: Nova Energy Substantive Application (May 2026).

Key project works are summarised in two phases: civil works and solar plant construction. These works will be undertaken in a single continuous stage.

5.2 Civil Works

Civil works will include:

- Construction of internal access tracks, including a central main track and a network of service tracks providing access to inverters.
- Earthworks for trenching of 33 kV sub-circuits, PV panel DC cabling, and communications and control cabling, along with minor cut-and-fill to accommodate panel installation.
- Stormwater management measures, including:
 - swale drains to direct stormwater flows and connect to existing farm drainage where practicable.
 - retention and sediment settlement ponds (where required) to manage discharge flow rates and sediment.
 - culverts beneath access tracks, where required.
 - natural hazard mitigation works, incorporating the measures above as appropriate.

5.3 Plant Construction

Solar plant construction will involve installation of support structures, mounting of panels, and connection to electrical infrastructure. In summary, this includes:

- Installation and operation of ground-mounted solar panels on a solar PV tracking system, mounted with single pile foundations.

- Electrical cabling of panels to associated electrical components and inverters.
- Installation of inverters on driven piles, elevated above ground level and connected to low-voltage (LV) and high-voltage (HV) systems.
- Installation of HV circuits (up to six), primarily on overhead poles, terminating at a new 33 kV switchyard equipped with protection, control, and isolation systems
- Construction of a switchyard (approximately 220 m²), including gravel surfacing and concrete foundations for a power conditioning structure.
- Consolidation of HV circuits into two feeder lines connecting to the substation.
- Connection of the solar plant to the two 220/33 kV transformers at the Transpower Twizel Substation, including associated 220 kV and 33 kV infrastructure.
- Construction of a permanent workshop building (approximately 350 m²) and an operations and maintenance building (approximately 155 m²), including three-waters infrastructure and parking.

5.4 Temporary Facilities

Temporary facilities will be established on-site to support construction activities, including:

- Site offices for construction management.
- Temporary construction power supply.
- Toilets and washroom facilities connected to waste storage tanks for regular servicing and off-site disposal.
- Laydown areas.
- Parking.
- Site signage

6. NATIONAL STATUTORY FRAMEWORK

There are two Iwi Environmental Management Plans that are relevant to this resource consent application. They are the Kati Huirapa Iwi Management Plan (1992) prepared for Arowhenua, and the Waitaki Iwi Management Plan (2019) prepared by Arowhenua, Waihao and Moeraki.

6.1 Fast-Track Approvals Act 2024 (FTAA)

The FTAA requires that functions, powers and duties under the Act are exercised in a way that is consistent with obligations under existing Treaty settlements.² Conditions on an approval may be set to recognise or protect a relevant Treaty settlement.³ The processes under the FTAA carry obligations for meaningful iwi engagement at all stages, including the following:

6.1.1 Consultation

Applicants for listed projects are required to consult relevant iwi authorities, hapū and Treaty Settlement Entities, provide a summary of the consultation and explain how it informed the project

² FTAA, section 7 and section 82.

³ FTAA, section 84.

before lodging a substantive application.⁴ The High Court has confirmed principles that apply to such consultation, including:

- Adequate information about a proposal is to be given in a timely manner so that those consulted know what is proposed.
- Those consulted must be given a reasonable opportunity to state their views.
- While those consulted cannot be forced to state their views they cannot complain, if having had both time and opportunity, they for any reason fail to themselves of the opportunity available
- Consultation is never to be treated perfunctorily or as a mere formality.
- The parties are to approach consultation with an open mind.
- Consultation is an intermediate situation involving meaningful discussions and does not necessarily involve resolution by agreement.
- Neither party is entitled to make demands.
- There is no universal requirement as to form or duration.
- The whole process is to be underlain by fairness.⁵

6.1.2 Substantive Application

To assist their consideration of a project, Expert Panels are strongly encouraged to invite comments on the application and draft conditions, or request further information about the application, from relevant iwi authorities, hapū and Treaty Settlement Entities and other relevant Māori groups.⁶ Guidance from panel convenors suggests panels should invite comments and consider information regarding mātauraka Māori, tikaka, matters of significance to Māori, whether the application aligns with Treaty settlement obligations and recognised customary rights under relevant legislation as well as how iwi feedback could be incorporated into consent conditions and management plans.

6.1.3 Hearing

If a hearing is held, section 58 requires panels to recognise tikaka Māori where appropriate.

6.2 Ngāi Tahu Claim Settlement Act 1998 (NTCSA)

The Ngāi Tahu Claim Settlement Act 1998 (NTCSA) was enacted to settle the historical Ngāi Tahu claims against the Crown and provides redress under Te Tiriti o Waitangi. The Crown apology explicitly recognises the rakatirataka of Kāi Tahu within its takiwā as follows:

“The Crown apologises to Ngāi Tahu for its past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries, and, in fulfilment of its Treaty obligations, the Crown recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui.”⁷

Rakatirataka is about upholding our rights and obligations to generations past, present and future. This includes te taiao, the mauka, awa and other landscapes of Kā Rūnaka and the ability to sustain our

⁴ FTAA, sections 29, 43(2)

⁵ *Land Air Water Association v Waikato Regional Council* [2001] ELHNZ 428 at [453], cited in *Ngāti Kuku Hapū Trust v Environmental Protection Agency* [2025] NZHC 2046

⁶ Fast-track Approvals Act 2024: Panel Conveners Practice and Procedure Guidance (22 July 2025) at page 9.

⁷ NTCSA, section 6.

people in the future: rakatirataka therefore concerns the interrelationship between our people and the natural environment.

The NTCSA includes specific mechanisms that provide for the exercise of rakatirataka and kaitiakitaka by mana whenua in relation to mahika kai, taoka species, and other resource management matters. These include rights in relation to the management of listed taoka species and specified significant areas including statutory acknowledgement areas.

Statutory acknowledgements are a mechanism to highlight the interest of Kāi Tahu in resource management processes affecting the areas covered by the acknowledgement. The Statutory Acknowledgements for Lake Ōhau and Te Ao Mārama (Lake Benmore) are set out in Schedules 32 and 59 of the NTCSA respectively.

Schedule 97 of the NTCSA details species the Crown recognises as taoka species.

6.3 Resource Management Act 1991

All decision-making under the Resource Management Act 1991 (RMA) is subject to the provisions of Part 2, which describes the purpose and principles of the RMA. These provisions recognise and provide for Kāi Tahu values and interests in Te Manahuna.

The relationship of Kāi Tahu with the wai, the whenua and taoka species is a matter of national importance that must be recognised and provided for in managing natural and physical resources.⁸ In respect to this requirement, the High Court has stated:

“The statutory obligation to recognise and provide for the relationship of Māori and their culture and traditions with their whenua and taonga, to have to regard to their kaitiakitanga and take into account the principles of the Treaty of Waitangi, does not permit indifference to the tikanga-based claims of iwi to a particular resource management outcome”.⁹

The depth and breadth of the associations of mana whenua with Te Manahuna is discussed in Section three of this report.

In achieving the purpose of the Act particular regard is required to kaitiakitaka.¹⁰ Kāi Tahu whānau exercise kaitiakitaka in Te Manahuna. Maintaining a balance between the right to access and use natural resources, and the responsibility to care for te taiao, with a focus on providing a sustainable base for future generations is implicit in kaitiakitanga.

The Environment Court has found that kaitiaki have a right to protect the history of their cultural and customary associations to an area.¹¹

7. MACKENZIE DISTRICT PLAN ZONING AND OVERLAYS

The application site is zoned General Rural Zone (GRUZ). The following policy overlays apply to the site: Flight Protection Area Pūkaki; Noise Control Boundary; Outstanding Natural Landscape; Sites of Natural Significance; Area of Visual Vulnerability (High and Medium); Flood Hazard Assessment; Liquefaction Assessment; and Hydro Inundation Hazard. The site also adjoins two Site and Area of

⁸ RMA, section 6(e).

⁹ *Ngati Maru Trust v Ngati Whatua Orakei* [2020] NZHC 2768.

¹⁰ RMA, section 7(a).

¹¹ *Ngāi Te Hapū v Bay of Plenty Regional Council* [2017] NZEnvC 73 at [88].

Significance to Māori (SASM) waterways and one SASM lake (refer to Figure 6 below). These are: Twizel River, Ōhau River and Lake Benmore.

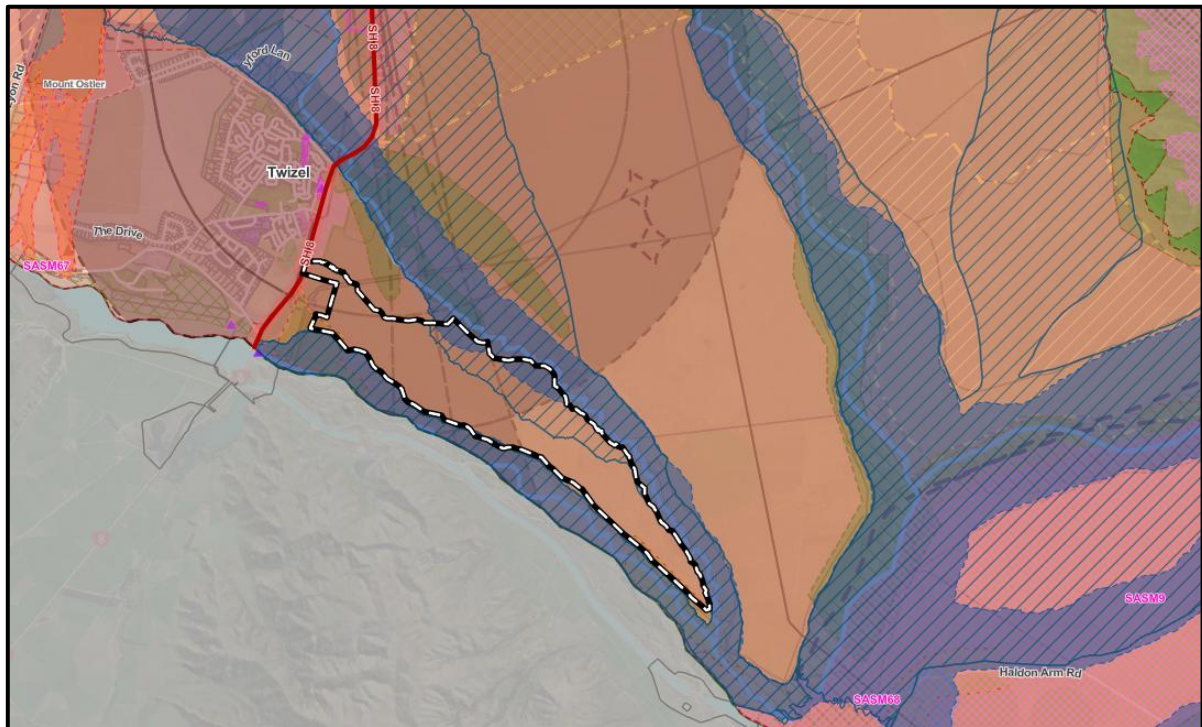


Figure 6: Relevant policy overlays applicable to the application site under the Mackenzie District Plan. Source (MDC EPlan).

7.1 Assessment of SASM Objectives and Policies

It is important to mana whenua that culturally significant sites and areas are protected from inappropriate activities, as their traditions are embedded in the landscape. The cultural landscape is a key component of mana whenua identity, and recognition of the history and traditions held within the landscape enables Kāi Tahu whānau to experience and engage with the landscape as their tūpuna once did.

The recognition of Sites and Areas of Significance to Māori (SASM) within the Mackenzie District Plan enables mana whenua to safeguard the cultural values of Te Manahuna and to pass on mātauraka to future generations. The protection of the Sites of Significance adjoining the Twizel Solar Farm, respectively Te Ao Marama (Lake Benmore), the Twizel River and the Ōhau River, is sought by mana whenua.

Given the proximity of the Twizel Solar site to several identified SASM areas and the potential for indirect effects, the following table outlines the relevant objectives and policies and provides commentary on how the proposal aligns with these provisions.

7.1.1 Assessment Limitations

This assessment of the SASM objectives and policies is based on information available at the time of preparation of this report, including the draft project design details, ongoing technical assessments, and information received through the pre-application consultation process.

It is noted that the proposal may be subject to further refinement through the substantive application process under the Fast Track Approvals Act 2024 (FTAA), including the preparation of further technical information and input from relevant parties.

Accordingly, commentary on alignment with SASM objectives represents an assessment of current understanding and proposed mitigation measures and may be subject to change as the project is further refined.

Table 1: Commentary on Relevant SASM Objectives and Policies from the Mackenzie District Plan.

PROVISION	RŪNAKA AND NGĀI TAHU COMMENTS
Strategic Objective MW-01: <i>The role of mana whenua is recognised and their historic and contemporary relationship with the District’s land, water bodies, indigenous species and other sites and areas of significance are recognised and provided for.</i>	This objective requires recognition of the historic and contemporary relationship of mana whenua with Te Manahuna and, consideration of how the proposal may affect that relationship. From a mana whenua perspective, land, water, and indigenous species are interconnected and form a unified whole, often expressed through the concept of “ki uta ki tai” (from the mountains to the sea). In this context, the potential effects of the proposed solar farm- including ancillary infrastructure and security fencing on the landscape and biophysical characteristics of the immediate and wider environment are relevant considerations. Through pre-application consultation, mana whenua sought to ensure their role and relationship with Te Manahuna are recognised and provided for. This has included developing mana whenua-specific consent conditions (including a Kaitiaki Governance Group and work programme) and discussion with Nova on key ecological matters. These discussions have focused on protecting avifauna through monitoring and trigger points informed by species status and population trends, particularly for <i>kakī</i> and other taoka species. Early engagement has also identified opportunities to enhance indigenous biodiversity values. Through pre-application engagement, mana whenua has provided a Kāi Tahu-perspective on key aspects of the project, which has helped inform Nova’s environmental responses at an early state which may reduce the need for more intensive engagement later in the process (as has occurred on other solar farm projects progressed under the FTAA).
Strategic Objective MW-02: <i>Mana whenua are able to:</i> <i>1. be actively involved in decision making that affects their values and interests;</i> <i>2. exercise their kaitiakitaka responsibilities; and</i>	This objective requires mana whenua to be actively involved in decision-making that affects their values and interests and ensuring that they can continue to exercise kaitiakitaka and carry out customary activities in accordance with tikanga. Within Te Manahuna, water bodies such as Lake Benmore and associated river systems are recognised as wāhi tapu and wai tapu. Access to these areas by mana whenua is typically undertaken via land, in accordance with tikanga. As such, it is important that physical access routes and

3. <i>carry out customary activities in accordance with tikanga.</i>	the ability to undertake cultural practices are maintained and, where possible, enhanced. As noted in relation to Objective MW-01, mana whenua has sought to provide for their ongoing involvement through the establishment of a Kaitiaki Governance Group and the development of a work programme. These mechanisms are intended to support active participation in decision-making, enable the exercise of kaitiakitaka, and provide opportunities to maintain or enhance customary practices. Nova has indicated support for securing these mechanisms through conditions of consent.
Objective SASM-O1: <i>Rakatirataka is recognised by supporting mana whenua to exercise kaitiakitaka over SASM.</i>	For mana whenua to effectively exercise kaitiakitaka, meaningful input is required into management plans and matters relating to the protection of taoka species, landscape values, and mahika kai. The proposed governance group is expected to provide a pathway for ongoing involvement; however, these matters need to be embedded within the development of management plans and secured through appropriate consent conditions. It is noted that Nova's draft consent conditions (provided for consultation) include opportunities for mana whenua involvement in the preparation of relevant management plans and through the proposed Kaitiaki Governance Group. Mana whenua has also had opportunities to understand and input into the development of mitigation measures, including the setting of triggers and thresholds for review or adjustment of mitigation approaches where required. Through the establishment of a specific work programme, it is anticipated that mana whenua will have further opportunities to protect and enhance their values and associations with the site and the surrounding environment.
Objective SASM-O2: <i>The relationship of mana whenua with their values within SASM is sustained and community awareness of the values of SASM is encouraged.</i>	This objective requires an understanding of the values associated with SASM features and the relationship mana whenua have with their takiwā. As noted above, a number of SASM adjoin the site boundaries and form part of a wider cultural landscape within Te Manahuna. It is anticipated that the establishment of an ongoing relationship with Nova, through mechanisms provided for in the draft conditions, will provide opportunities for mana whenua to sustain their values, while also enhancing Nova's understanding of those values over time. As also noted above, pre-lodgement engagement on the substantive application has enabled mana whenua to inform key management responses to potential environmental effects associated with the project, subject to the necessary approvals being granted.

Objective SASM-O3: <i>Inappropriate subdivision, use and development within SASM is avoided.</i>	Given the scale and complexity of proposed solar farm development within Te Manahuna, mana whenua has sought to be closely involved with Nova, as well as other solar farm applicants, to support the identification, avoidance, and appropriate management of potential adverse effects. Effective engagement is, however, dependent on the availability of robust and reliable information to inform assessment and decision-making, which has at times been challenging in relation to other projects. It is understood that Nova has been closely observing other solar farm projects being progressed under the Fast Track Approvals Act 2024 (FTAA) to support the preparation of a comprehensive application to the Environmental Protection Authority (EPA). While this may assist in aligning the proposal with the intent of this objective, the extent to which inappropriate subdivision, use, and development within SASM areas is avoided has yet to be fully demonstrated, as further technical information continues to be provided and additional input is being received from section 53 parties, including technical experts for the Department of Conservation. As such, full alignment with this objective may not be able to be confirmed until a later stage of the substantive application process.
Objective SASM-O4: <i>The ability of mana whenua to access, maintain and use mahika kai and nohoaka sites of cultural value is enhanced.</i>	It is anticipated that the establishment of an ongoing relationship with Nova will provide opportunities for mana whenua to maintain access to mahika kai areas and undertake associated cultural practices. A key mechanism to support consistency with this objective is the development and implementation of a strategic work programme. Nova may also wish to consider how access and cultural values can be appropriately provided for within the site, noting that the solar farm is likely to require permanent security fencing.
Policy SASM-P2: <i>Ensure consultation with the relevant mana whenua is undertaken where activities have the potential to adversely affect SASM and their values.</i>	Mana whenua confirms that a consultation process led by Nova has provided opportunities for input at the pre-application stage for the project, as well as during the earlier Referral stage. It is further noted that the proposed consent conditions provide for ongoing opportunities for engagement with mana whenua, including through the establishment of a Kaitiaki Governance Group, a Cultural Monitoring Programme, and a Strategic Cultural Programme (work programme). These mechanisms are intended to support continued collaboration between Nova and mana whenua, including in relation to the protection of taoka species and the avoidance and management of potential effects arising from the solar farm development.
Policy SASM-P3: <i>Enable mana whenua to undertake mahika kai within SASM in accordance with tikaka.</i>	As above. Refer to Objective SASM-O4.

Policy SASM-P4:

Maintain existing access to SASM for mana whenua and encourage landowners to explore opportunities and methods to provide new access to SASM, where requested by mana whenua.

Policy SASM-P5:

Encourage restoration and enhancement of indigenous vegetation that supports mahika kai.

While no specific restoration or enhancement projects have yet been confirmed for the site, mana whenua have identified potential enhancement opportunities in response to the loss of bird habitat and the potential for bird strike associated with the proposed development. It is noted that the Arowhenua nursery has experience in delivering indigenous vegetation restoration and enhancement projects in other parts of Te Manahuna, which combined with the strategic work programme (to be advanced by the governance group), may provide a pathway for future opportunities associated with the site.

8. IWI MANAGEMENT PLANS

8.1 Iwi Management Plan of Kati Huirapa (1992)

The Kati Huirapa Iwi Management Plan contains objectives and policies that promote the sustainable management of the takiwā, with the key focus areas being:

- Water quality and quantity
- Mahika Kai quality and quantity
- Habitat Integrity; and
- Provision for customary practices, including access for gathering mahika ka.

The key themes that were introduced into the Iwi Management Plan by Kati Huirapa are:

- Provide for cultural and spiritual values and customs and traditions;
- Allow all things that affect Arowhenua to be dealt with by Arowhenua first and foremost; and
- Increase opportunities for Arowhenua to practice customs and traditions associated with the uri (descendants) of Arowhenua takiwā.
- Ensure all breeding areas for fish and birds (taonga species) are undisturbed,
- Ensure access to mahika kai is maintained; and
- Ensure access to mahika kai also allows provides for access to water of sufficient quantity and quality to exercise traditional rights and customary uses.

8.2 Waitaki Iwi Management Plan (2019)

Arowhenua, Waihao and Moeraki developed the Waitaki Iwi Management Plan as an expression of rakatirataka and in fulfilment of their shared kaitiaki responsibilities within the Waitaki Catchment.

Natural and cultural resources are taoka handed down by tūpuna (ancestors). It is the responsibilities of the present generation to ensure that the resources are managed sustainably for the generations

that follow. The plan provides a whanau-focused policy framework for the protection and enhancement of natural and cultural resources in the Waitaki Catchment.

The Plan was developed in 2019 to:

- Describe the values held by Kāi Tahu relating to Aoraki, wai, mahika kai and wāhi tupuna in the Waitaki Catchment.
- Identify the primary issues Kāi Tahu have regarding these matters in the Waitaki Catchment.
- Articulate Kāi Tahu policies and management guidelines for these matters
- Provide for the relationship that Kāi Tahu have with these resources.

9. CONSULTATION

Nova has undertaken extensive and ongoing consultation with mana whenua representatives, Regional Environmental Entities, and Kāi Tahu throughout the development of the solar farm project. This engagement has continued as project details have progressed ahead of the submission of the substantive application.

Through this process, mana whenua has had opportunities to better understand the scope and scale of the project, including drawing on learnings from similar solar farm developments. Engagement has also enabled mana whenua to identify key matters of interest and contribute to the development of environmental management approaches, including mitigation measures, monitoring frameworks, and the establishment of appropriate thresholds to support adaptive management responses to ecological effects. It has also supported the development of mechanisms to enable an enduring working relationship between mana whenua and Nova.

Initial engagement was undertaken while Nova was proposing to seek resource consents through a standard RMA process. Subsequent engagement has reflected Nova's decision to pursue referral of the project under the FTTA.

A Mana Whenua Report was prepared in February 2025 to accompany the referral application to the Ministry for the Environment. Since that time, Nova has continued to engage with mana whenua representatives and their advisors through a combination of hui (both in-person and online), information sharing, and a site visit to the project area. This has included the provision of draft Assessment of Environmental Effects (AEE) documentation and supporting technical reports in advance of lodgement of the substantive application with the EPA.

Overall, engagement to date has been open and responsive, with feedback from mana whenua understood to have informed ongoing project development, including environmental management approaches and the drafting of proposed consent conditions.

A detailed summary of consultation undertaken following approval of the referral application by the Minister for Infrastructure on 1 August 2025 (covering November 2025 to May 2026) is provided in Appendix 3.

10. POSITIVE ASPECTS ASSOCIATED WITH SOLAR

Kāi Tahu and the three Rūnaka would like to emphasise that Kāi Tahu is not opposed to solar farms. Kāi Tahu support the development and construction of renewable energy as opposed to the burning

of fossil fuels and the construction of large dam structures that flood and alter key unique ecological, social, economic and cultural landscapes.

While Kāi Tahu support renewable energy proposals, they are also of the belief that such activities need to be situated in appropriate areas where the visual and physical impacts are either avoided or appropriately mitigated; for example, through the use of indigenous planting that is found within the Pūkaki Ecological District.

11. POTENTIAL ADVERSE EFFECTS ARISING FROM SOLAR FARMS

The following sections identify the key actual and potential adverse effects associated with large-scale solar farm development within Te Manahuna from a mana whenua perspective. These effects are interconnected and cumulative in nature, reflecting the relationship between cultural values, ecological systems, landscape character, and wai. While discussed under separate headings for ease of assessment, these matters are viewed holistically through a ki uta ki tai lens.

11.1 Loss of Connection to Whenua

The Kāi Tahu association with the Waitaki Catchment and Te Manahuna extends back to the earliest human habitation of Te Wai Pounamu. The Waitaki River (now Te Ao Mārama / Lake Benmore), along with the significant landforms of Te Manahuna including the Benmore Range, represent ancestral landscapes from which Kāi Tahu descend. These mountains, lakes, rivers, and valleys are fundamental to Kāi Tahu identity as an iwi.

This relationship is formally recognised through the Statutory Acknowledgement for Te Ao Mārama (Lake Benmore) under the NTCSA, which affirms the cultural, spiritual, historic, and traditional associations of Kāi Tahu Whānui with the lake and its wider catchment. Te Ao Mārama overlays the original path of the Waitaki River, an ancestral pathway linking Aoraki to the sea, and remains central to Kāi Tahu identity. The lake also inundated areas of historical importance, including nohoanga, wāhi tapu, urupā, and rock art sites, many of which now lie beneath its waters.

Prior to European settlement, Kāi Tahu tūpuna moved extensively through South Canterbury, the Waitaki Valley, and Te Manahuna, undertaking seasonal cycles of mahika kai gathering. Movement patterns followed the lifecycles of species and were supported by extensive networks of ara tawhito (traditional trails), which enabled access to resources such as weka, kākāpō, kiore, and tuna. These routes also functioned as important social and economic connections and remain a taoka in themselves.

A key example of this interconnected landscape is the kāika mahika kai site known as Kahuika, located at the junction of the Ōhau, Pūkaki, and Takapō Rivers near the southern extent of the project area. This site was strategically used during seasonal harvests, particularly for tuna, and reflects the interdependent nature of the wider catchment. The location of this site is shown in Figure 7 below.

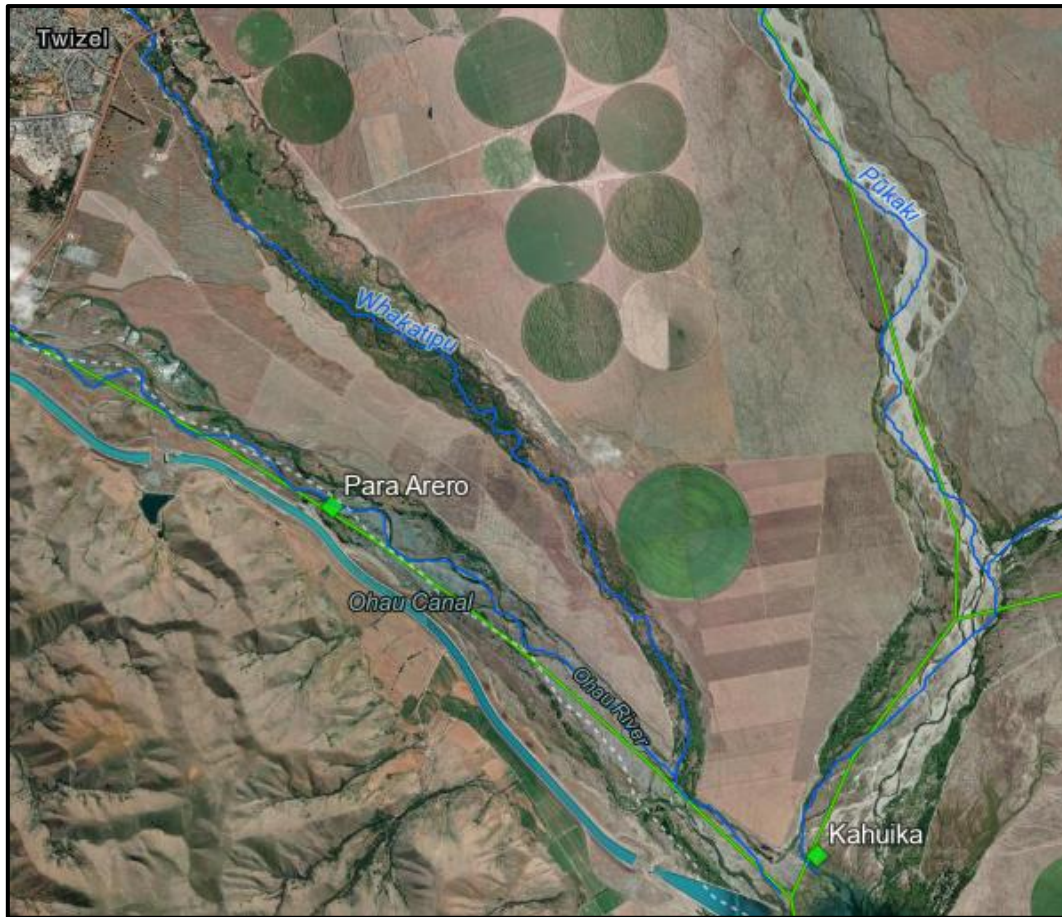


Figure 7: Aerial image illustrating the approximate location of the site and the culturally significant kāika nohoaka and ancient trails.

Colonisation and early European settlement resulted in substantial land loss through mechanisms such as Kemp’s Deed, eroding Kāi Tahu connection to large areas of Te Manahuna and disrupting access to mahika kai and seasonal resources. The introduction of regional and district boundaries that did not align with iwi and hapū takiwā further compounded this issue, undermining traditional ki uta ki tai resource management systems.

The taking of land from mana whenua (‘te tango whenua’) has had profound and ongoing impacts on the economic, social, and cultural wellbeing of Kāi Tahu, and has constrained access to land and waterways reducing the ability to pass mātauraka across generations.

Further impacts occurred between 1920 and 1970 with the development of the Waitaki hydroelectric scheme. The construction of multiple power stations, lakes, and canal systems transformed the landscape and further reduced access to traditional hunting areas and mahika kai resources. The creation of hydro lakes also resulted in the loss or inundation of numerous culturally significant sites, including nohoaka, urupā, wāhi tapu, wāhi taoka, and Māori rock art.

More recently, the expansion of irrigation, intensification of farming, and land use conversion within Te Manahuna have further restricted access to culturally significant sites, many of which remain on private land and are therefore dependent on landowner cooperation for access.

Within this context of cumulative and ongoing land use pressures, Kāi Tahu are concerned that the establishment of large-scale solar farms (including the Nova Twizel Solar Farm) will further erode connection to ancestral landscapes. In particular, the scale and nature of the proposed development

have the potential to constrain access to key areas, including identified kāika nohoaka along the Ōhau River, which are intended to support mahika kai practices and intergenerational transfer of mātauraka.

Nohoaka are not simply access points, but places from which Kāi Tahu Whānui can experience the landscape as their tūpuna did, maintain cultural practices, and pass on mātauraka to future generations. Any constraints on access or changes to surrounding environments risk undermining their purpose and effectiveness.

In addition to physical access, the perception and experience of the landscape is critical. For Kāi Tahu, landscapes are inseparable from their cultural and ancestral associations. Changes to landscape character, including the introduction of large-scale infrastructure, therefore have implications not only for visual amenity but for cultural identity and whakapapa connections.

Visual and experiential landscape values are therefore a core component of cultural connection to Te Manahuna. The ability to experience the openness, scale, and ancestral qualities of the landscape is integral to maintaining that connection. Earlier iterations of the proposal considered landscape 'screen plantings' to reduce the visibility of the solar farm from public viewpoints. However, this approach has not been progressed due to potential adverse effects on indigenous biodiversity and ecological values. The visual effects of the Twizel Solar Farm therefore remain largely unaddressed. In this context, mana whenua encourages further consideration of alternative landscape design responses.

The Haldon Solar Farm proposal is understood to be considering similar measures, including landscape design options to reduce visibility from public roads while avoiding adverse effects on indigenous biodiversity. This may provide a useful example of how design responses can better balance ecological constraints with the need to maintain cultural connections to the landscape.

Active participation in restoration projects and the regeneration of mahika kai habitats, provides opportunities for mana whenua to maintain a hands-on relationship with the whenua, rekindle connections, and pass on mātauraka.

11.2 Cumulative Effects

Cumulative development pressures within Te Manahuna will further erode Kāi Tahu connection to the whenua (as described in section 11.1), including through the scale and concentration of solar farm development across the landscape.

There are multiple solar farms proposed for Te Manahuna either under the Resource Management Act 1991 or through the Fast Track process, as outlined in Appendix 2. These solar farms will occupy an area of approximately 6,117.36 ha within Te Manahuna.

Kāi Tahu are currently aware of nine large-scale solar farm developments that are currently proposed in Te Manahuna, as illustrated in Figures 8 and 9 below.

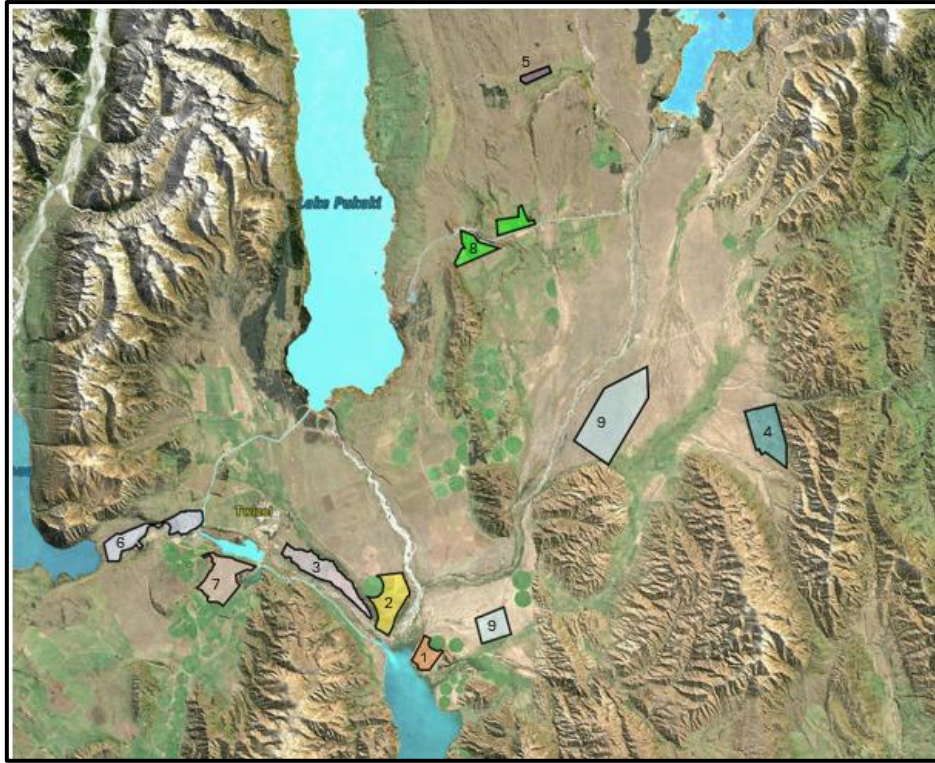


Figure 8: Aerial map illustrating the location of the nine proposed solar farms within Te Manahuna.
Source: Canterbury Maps

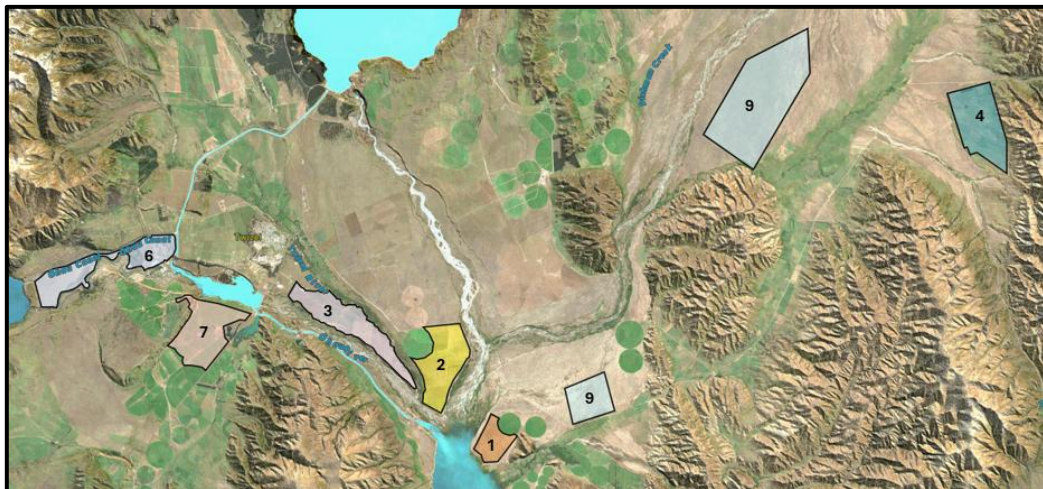


Figure 9: Closer aerial photo of the proposed solar farms located within the southern portion of Te Manahuna.
Source: Canterbury Maps

Key:

- | | |
|--|--|
| 1. Lodestone Energy, Haldon Solar | 5. Simpsons, Balmoral Station |
| 2. Far North Solar, The Point Solar Farm | 6. Far North Solar, Ōhau A |
| 3. Nova Energy, Twizel Solar Farm | 7. Douglas McIntyre, Twizel Solar |
| 4. Helios Energy, Grampians Solar | 8. Contact Energy, Irishman Creek Station |
| | 9. Kakariki Renewables, Grays Hill Station |

The cumulative scale of the proposed solar farm development along the northern side of the Ōhau River and the top portion of Lake Benmore is evident. The proposed solar farms and their extensive

security fencing effectively create a physical barrier, preventing mana whenua from accessing their historical nohoaka and mahika kai sites, and cumulatively impacting on the values of this wāhi tūpuna landscape. In combination with other existing barriers, including the Ōhau Canal, the Nova Twizel Solar Farm acts as a further barrier preventing mana whenua from accessing their cultural site and mahika kai resources.

Kāi Tahu acknowledge that the distinctive natural landscape and biodiversity values of Te Manahuna have been permanently modified through the creation of the Waitaki hydro scheme, expansion of irrigation, and intensified agriculture, which have altered the baseline for future development. However, the Nova application introduces further large-scale industrial development into Te Manahuna, in combination with the other proposed solar farm developments.

In addition to direct land-use change, solar farm developments may result in changes to soil moisture, evaporation rates, and localised microclimatic conditions by creating heat island effects. These changes can influence ecological systems, including potential increases in surface water temperatures, effects on aquatic ecosystems, and the fragmentation of surface and groundwater interactions. Such changes may also affect indigenous fauna, including aquatic insects and waterbirds, some of which may be attracted to or interact with the solar farm's infrastructure. Given the presence of significant and endangered taoka species within and surrounding the site, these potential effects require careful assessment and appropriate management through the substantive application process.

11.3 Biodiversity

Changes to biodiversity values contribute to the erosion of cultural connection by reducing the availability of mahika kai resources and diminishing ecological relationships that underpin Kāi Tahu identity (as described in section 3 of this report).

The Twizel Solar project site has been subjected to varying degrees of agricultural development over a long period of time. Despite the modified condition of the site, it retains biodiversity values that need to be appropriately understood, protected and where possible, enhanced.

The Wildlands Report notes that the proposed solar farm site is located within the Pūkaki Ecological District, which is characterised by dry outwash plains between Lakes Tekapo and Benmore, predominantly below 600 metres above sea level.¹² The climate is semi-arid to sub-humid, with cold winters, warm summers, and annual rainfall of approximately 600–1,600 mm. While pasture dominates much of the Ecological District, areas of tussock land and indigenous scrub (including matagouri, coprosma, kōwhai, and corokia) remain. Grazing pressures from sheep and rabbits have significantly influenced vegetation patterns across the landscape.

Notwithstanding this level of modification, the wider environment, particularly braided river systems continue to provide important habitat for a range of bird species, as well as notable rare invertebrate species.¹³

Wildlands concludes that all vegetation and habitat types assessed, (except for sweet brier shrubland) meet criteria for ecological significance, primarily due to their function as habitat for Threatened and At-Risk indigenous fauna. While exotic-dominated grassland systems (such as browntop–sweet vernal–clover pasture) are highly modified and contain limited indigenous vegetation, their structure provides important habitat for dryland fauna where indigenous habitat is limited.

¹² Wildlands (March 2026), provided by Nova on 30 April 2026.

¹³ Wildlands (March 2026), p.16.

These habitats support species such as minute grasshopper and McCann's skink and provide potential breeding habitat for Tōrea / South Island pied oystercatcher. It is also possible that kakī / black stilt may utilise pasture areas for foraging following rainfall events.

Wildlands further identifies that 13 of the 15 vegetation and habitat types assessed meet criteria for rarity and distinctiveness, with Threatened or At-Risk vascular plant and indigenous fauna species present.¹⁴ Ephemeral wetland habitats also meet rarity criteria, while alder- and willow-dominated wetlands are assessed as significant.

A range of additional indigenous vegetation types, including flood channel shrubland, tall fescue marsh, scarp herbfield and grassland, wildling conifer/scarp herbfield and grassland, old river terrace systems, and sweet vernal-mouse-ear hawkweed communities, are also identified as ecologically significant due to their ecological context, including their role in providing habitat and connectivity across the site.

Overall, indigenous vegetation within the site is considered to have high ecological value, due to its limited extent locally and the presence of Threatened and At-Risk species.

While the project design has been refined to avoid areas of higher-density indigenous vegetation, the introduction of large-scale solar infrastructure will result physical and ecological changes, including shading across parts of the site, which is likely to influence vegetation patterns and habitat function over time.

The proposal also includes sheep grazing beneath and between solar arrays. It is understood that the site is not currently well suited to grazing and the introduction of pastoral use in this manner is likely to further modify existing ecological characteristics and habitat values.

The wider Te Manahuna environment has already experienced significant biodiversity losses resulting from the expansion of irrigation, intensification of agriculture, and long-term land use change. Within this context, further reduction or modification of remaining biodiversity values through large-scale solar development is a key concern for mana whenua.

From a Kāi Tahu perspective, the retention of existing biodiversity values within the Twizel Solar Farm site, and the implementation of integrated restoration and rehabilitation approaches, are considered important to support the ongoing relationship between Kāi Tahu and the whenua and to address cumulative biodiversity loss across Te Manahuna.

11.4 Avifauna

Effects on avifauna, including threatened and taoka species, further contribute to the degradation of ecological and cultural values associated with Te Manahuna.

The special association that Kāi Tahu have with taonga species, including bird species within the Kāi Tahu takiwā, is formally acknowledged by the Crown in the NTCSA, with lists of taonga species contained in Schedules 97 and 98.

The Wildlands desktop assessment concludes that nine threatened or at-risk species are recorded in the vicinity of the site, including several taoka species such as the Nationally Critical kakī / black stilt (*Himantopus novaezelandiae*), kotuku / white heron (*Ardea alba modesta*), and the Nationally Endangered tarapirohe / black-fronted tern (*Chlidonias albobristatus*).¹⁵

¹⁴ Wildlands (March 2026), p.51

¹⁵ Wildlands (2026) *Assessment of Potential Ecological Effects of the Proposed Nova Energy Solar Farm near Twizel*

The application site adjoins the Kakī / Black Stilt Captive Breeding Centre (Old Iron Bridge Road), managed by the Department of Conservation. Kakī were formerly widespread throughout New Zealand, but their range contracted significantly during the 20th century. Breeding is now largely confined to the Mackenzie Basin, between the Lake Tekapo and Lake Pūkaki basins in the north and the Ahuriri River in the south.

Kakī inhabit braided riverbeds, side streams, swamps, tarns, and lake margins, and may also utilise irrigated paddocks where suitable feeding conditions are present. While most riverine bird species migrate to coastal areas in winter, kakī are known to remain within the Mackenzie Basin even under harsh seasonal conditions.

Given the presence of taoka species, including nationally critical and nationally endangered species in close proximity to the site, and the ecological significance of the wider braided river system, a robust understanding of species-specific risk is required to appropriately assess potential effects arising from the proposed development, particularly in relation to collision risk.

It is understood that much of the avifauna survey work undertaken to inform the proposal was completed during the referral stage of the Fast-track process between 2022 and 2024, with no substantial further seasonal survey work currently proposed. Given the scale of the proposed development, the dynamic nature of braided river ecosystems, and the presence of nationally critical and nationally endangered species within the wider environment, mana whenua question whether the existing information base is sufficiently robust to fully characterise seasonal and long-term avifauna use of the site and surrounding landscape.

This is of particular concern given that the proposed management framework relies heavily on adaptive management responses once the solar farm is established. The potentially limited nature of the existing avifauna information base raises concerns regarding the extent and significance of potential effects and the ability to proactively avoid or mitigate adverse impacts on taoka species.

While a draft avifauna management plan and some survey information (prepared during the referral process) have been provided, there remains limited detail on species-specific risk and the proposed adaptive management framework. Although a range of potential mitigation measures have been identified, these are presented as a “toolbox” of options, with limited clarity regarding how and when they would be implemented, or their likely effectiveness.

As currently presented, the proposed management framework does not provide sufficient certainty that adverse effects on avifauna can be appropriately avoided, remedied, or mitigated.

A species-specific avifauna management plan developed in consultation with mana whenua and relevant ecological experts (including DOC) should be developed. This should include a bird collision monitoring programme supported by clearly defined mortality thresholds or trigger levels that would initiate timely and effective management responses.

However, based on the information currently available, there remains uncertainty regarding:

- the detail and robustness of monitoring methodologies;
- the adequacy and currency of the existing avifauna survey information;
- the effectiveness of the proposed mitigation approach; and
- the extent to which management responses would achieve positive outcomes for affected species.

This level of uncertainty is of significant concern to mana whenua, particularly given their involvement in the kakī recovery programme and the taoka species status of these birds (as recognised under the NTCSA).

11.5 Wai / Water

The way in which mana whenua understand and relate to wai (water) is culturally distinct. Wai is a living taoka and is central to the identity, wellbeing, and cultural continuity of Kāi Tahu Whānui. It is recognised as a sacred resource, carrying both physical and spiritual significance, and symbolising the connection between past, present, and future generations.

Despite the erosion of some customary practices through historical land use change and colonisation, wai remains integral to the cultural life of mana whenua. The health and mauri of water bodies continue to be a primary concern and focus for mana whenua.

Water catchments within Te Manahuna were central to the survival and wellbeing of tūpuna living in the rohe. Awa such as the Ōhau, Twizel, Pūkaki, and Takapō Rivers provided natural movement corridors through the landscape and enabled access to inland resources and mahika kai sites. The wider catchment operated as an interconnected system supporting seasonal occupation, resource gathering, and cultural practice.

However, changes in land use, increased demand for irrigation, and broader climatic shifts, including reduced snowmelt and altered hydrological patterns, have placed increasing pressure on water systems within the rohe. These changes contribute to reduced lake and river levels, increased water temperatures, and associated ecological effects, including conditions that can support algal bloom formation where nutrient levels are elevated.

For mana whenua, the degradation of wai directly affects the ability to exercise customary practices, particularly mahika kai, and weakens the intergenerational transmission of mātauraka. Fragmentation of access to healthy water systems also affects the ability of kaitiaki to pass knowledge to mokopuna in the way it was historically received.

For mana whenua, degradation of wai cannot be separated from degradation of the wider cultural landscape, as the health of waterways is intrinsically linked to the health of the whenua and the ability to sustain mahika kai practices.

Maintaining and enhancing the life-supporting capacity of wai therefore remains central to the relationship between Kāi Tahu Whānui and Te Manahuna. The protection of water quality, quantity, and ecological function is intrinsically linked to cultural wellbeing, identity, and the ongoing expression of kaitiakitaka.

Within this context, further land use change and cumulative development pressures within the catchment have the potential to exacerbate existing stressors on water systems and further erode cultural and ecological values associated with wai.

Potential effects associated with stormwater management, groundwater interactions, erosion and sediment control, and wider catchment modification are therefore matters of ongoing concern for mana whenua.

12. MANAGEMENT OF ADVERSE EFFECTS

12.1 Introduction

During the initial site visit undertaken on 6 November 2024, representatives of Nova and the Rūnaka discussed a range of opportunities to support ongoing cultural and environmental outcomes associated with the proposed solar farm development.

Since that time, engagement between mana whenua and solar farm developers within Te Manahuna has evolved significantly, including broad agreement to establish Kaitiaki Governance Groups (KGG) to facilitate ongoing kanohi ki te kanohi engagement at a mana ki te mana level throughout the life of solar farm projects, alongside the development of Strategic Cultural Programmes (SCP) to support ongoing mana whenua involvement in environmental management and project implementation.

Through these processes, mana whenua expectations have shifted beyond stand-alone monitoring initiatives toward a broader and more integrated approach to environmental management, restoration, cultural participation, and long-term relationship building.

Mana whenua considers that ongoing involvement throughout the life of the Twizel Solar Farm project is important to ensure that their values, mātauraka Māori, and kaitiakitaka continue to inform project implementation, environmental management, monitoring, and adaptive responses over time.

12.1.1 Restoration and Enhancement Opportunities

During engagement, mana whenua broadly expressed support for restoration and enhancement initiatives within and surrounding the project site. This includes undertaking landscape planting along parts of the site boundary (to partially screen views of the site), while recognising the need to avoid adverse effects on existing indigenous biodiversity values.

Mana whenua however, note that restoration initiatives should extend beyond landscape treatment alone and include opportunities to support wider ecological restoration outcomes, including enhancement of mahika kai habitats, pest management initiatives, and ecological rehabilitation within Te Manahuna.

In this regard, it is acknowledged that Nova proposes to avoid identified wetland areas and establish invertebrate habitat enhancement areas. Mana whenua anticipates receiving further details regarding these enhancement initiatives in due course.

It is also noted that no specific mitigation response is currently proposed in relation to potential impacts on avifauna habitat. As such, there may be further opportunities to explore additional enhancement or restoration initiatives.

Where appropriate, restoration approaches should be developed collaboratively with mana whenua, ecological experts, and relevant agencies such as the Department of Conservation. Through discussions with Nova, it is understood that there is support for this ongoing involvement.

12.1.2 Mātauraka Māori and Environmental Monitoring

Mana whenua considers that mātauraka Māori should form part of the ongoing environmental management approach for the project. This includes recognition of the relationship between environmental health and the mauri of the wider landscape and catchment.

Potential areas of ongoing monitoring identified by mana whenua include:

- soil health and contamination monitoring;

- ecological health and habitat condition monitoring;
- lizard and skink population monitoring;
- avifauna monitoring; and
- water quality monitoring.

Mana whenua consider that monitoring should not be viewed solely as a technical exercise, but also as a means of understanding how the mauri of the environment is responding over time to management approaches.

Where degradation of mauri occurs, this may indicate broader ecological and cultural decline within the landscape. Conversely, positive ecological outcomes and the flourishing of taoka species may indicate that restoration and management approaches are functioning effectively.

12.2 Loss of Connection to Whenua

In response to the combined effects of the Twizel Solar Farm, mana whenua has sought to establish mechanisms to support an enduring and active relationship with the consent holder. This includes the establishment of a Kaitiaki Governance Group (KGG) and a Strategic Cultural Programme (SCP).

The KGG provides a formal and ongoing forum for engagement throughout the life of the project, enabling mana whenua to exercise kaitiakitaka and contribute mātauraka Māori to environmental management and decision-making.

The SCP provides a structured and adaptive work programme through which cultural, ecological, and landscape initiatives can be developed and implemented. This includes monitoring, restoration, enhancement, cultural induction, and other initiatives agreed through the KGG.

Together, these mechanisms provide a pathway that supports an ongoing relationship with the whenua and opportunities for mana whenua participation in the ongoing management of the site and surrounding environment.

At a broader level, the health of the environment and the wellbeing of Kāi Tahu Whānui are intrinsically linked. Continued erosion of connection to ancestral landscapes risks compounding historical impacts and weakening the ability to sustain cultural identity, practices, and knowledge over time.

The erosion of connection to whenua described above arises through a range of interrelated factors, including cumulative landscape change, loss of biodiversity, and changes to wai. These matters are further addressed in the following sections.

12.3 Cumulative Effects

In response to the cumulative and ongoing effects of solar farms, mana whenua has sought to establish enduring relationships with solar farm developers within Te Manahuna through the creation of Kaitiaki Governance Groups (KGG) and the development of Strategic Cultural Programmes (SCP).

Together, these mechanisms are intended to support a coordinated, adaptive approach to managing effects across the landscape over time, while enabling mana whenua to participate in monitoring, restoration, and decision-making.

Mana whenua has also expressed interest in more integrated environmental management across the three solar farm projects currently progressing under the FTAA process. This would better reflect a ki uta ki tai approach and support more effective management of cumulative effects on ecological systems and cultural values.

12.4 Biodiversity

In response to the biodiversity values and potential effects identified above, mana whenua seeks to ensure that ecological management approaches adopted for the Twizel Solar Farm are robust, integrated, and capable of responding to change over time.

This includes a strong emphasis on:

- the retention and protection of existing indigenous biodiversity values, particularly where these support taoka species and mahika kai;
- restoration and enhancement of degraded habitats, including opportunities to improve ecological connectivity across the site and wider landscape; and
- incorporation of mātauraka Māori into ecological management, monitoring, and decision-making processes.

Mana whenua consider that the establishment of a Kaitiaki Governance Group (KGG) and the development of a Strategic Cultural Programme (SCP) provide important mechanisms to support these outcomes. Through these mechanisms, mana whenua can actively participate in ecological monitoring, restoration initiatives, and the ongoing refinement of management responses over the life of the project.

12.5 Avifauna

In response to avifauna effects, mana whenua seeks development of a robust, species-specific management framework in partnership with ecological experts and relevant agencies, including DOC.

This management framework should include:

- updated and ongoing avifauna survey work to improve understanding of seasonal and long-term species use of the site and surrounding environment;
- clearly defined monitoring methodologies and collision risk assessment processes;
- measurable mortality thresholds or trigger levels linked to specific management responses; and
- ongoing review and refinement of management approaches as further information becomes available over the life of the project.

A precautionary approach is considered necessary given the presence of taoka species, the proximity of the Twizel Solar Farm site to breeding and recovery programmes, and the uncertainty that currently remains regarding the scale and significance of potential effects.

Clear implementation pathways, monitoring requirements, and adaptive management responses are required to provide greater confidence in long-term ecological outcomes for avifauna within Te Manahuna.

12.6 Wai / Water

Mana whenua supports an integrated and precautionary approach to the management of wai that recognises the interconnected nature of water systems across Te Manahuna. In practice, to maintain the mauri of waterways, this includes:

- avoiding adverse effects on water quality and hydrological processes where practicable;
- ensuring robust stormwater, erosion, and sediment control measures are implemented and monitored; and
- enabling ongoing mana whenua involvement in water-related management and monitoring through the Kaitiaki Governance Group and associated management processes.

From a mana whenua perspective, protection of wai is fundamental to sustaining ecological health, mahika kai practices, and the ongoing relationship between Kāi Tahu Whānui and the wider landscape.

12.7 Limitations and Dependencies of Proposed Responses

A range of responses and management approaches have been identified in the above sections, including Kaitiaki Governance Groups (KGG), Strategic Cultural Programmes (SCP), ecological management frameworks, and monitoring programmes. While these mechanisms provide important opportunities for engagement, participation, restoration, and adaptive management, their effectiveness is dependent on several key factors, including:

- consistent implementation across multiple projects and associated consents/approvals;
- access to robust ecological, hydrological, cultural, and monitoring information to inform decision-making;
- the inclusion of clear, enforceable, and appropriately resourced consent conditions;
- ongoing commitment and participation from consent holders, mana whenua, and relevant agencies over the life of the projects; and
- the ability of adaptive management approaches to respond effectively to cumulative and long-term environmental change.

Accordingly, while these mechanisms provide opportunities to support the management of effects and strengthen mana whenua involvement in environmental management, they may not fully address the cumulative erosion of cultural, ecological, and landscape values occurring within Te Manahuna.

13. CONCLUSION

*Mō tātou, ā, mō kā uri a muri ake nei.
For us and for our children after us*

Kāi Tahu still grieve the loss of their traditional connection to Te Manahuna and the erosion of the values of this significant wāhi tūpuna landscape. The construction of hydro lakes and canals has resulted in the loss of large, braided rivers and significant biodiversity losses including the loss of habitats for indigenous plant, bird and fish species. The expansion of irrigation and intensification of agriculture has further degraded the values of Te Manahuna. The slow destruction of Te Manahuna is seen by mana whenua as “a death by a thousand cuts”.

Mana whenua is concerned that the proposed solar farm developments will further erode the ability of mana whenua to exercise kaitiakitaka and rangatirataka, and to pass on mātauraka to the next generation.

Ongoing engagement with Nova through the Kaitiaki Governance Group (KGG) and Strategic Cultural Work Programme will ensure that restoration initiatives, monitoring programmes, and adaptive management responses remain responsive over the life of the Twizel Solar Farm project. This includes enabling mana whenua participation in:

- ecological restoration initiatives;
- monitoring and management activities;
- review of environmental outcomes; and
- development of adaptive responses where adverse effects are identified.

Mana whenua also considers that, over time, there may be opportunities to explore more integrated management approaches across solar farm developments within Te Manahuna, particularly where projects are located in close proximity to one another, as is the case with the three projects currently being progressed under the FTAA.

APPENDIX 1: MANA WHENUA PROPOSED CONDITIONS

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 makeup of the KGG, frequency of hui and group composition.

Advice Note: Mana whenua status is to be determined by Kā 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 Condition X 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- 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.

KGG6- 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.

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 contemplated 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) Integrate mātauranga Māori into environmental management associated with the Solar Farm.

SCP3 – Content

The Strategic Cultural Programme, shall include:

- a) 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 construction or operation of the Project; and
- e) Processes for periodic review of the programme to enable adaptation over time.

SCP4 – Participation / Opt-Out

- a) 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.
- b) 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 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 must, subject to any relevant health and safety requirements, ensure that Mana Whenua representatives have access to all relevant parts of the Project site to carry out any of the roles and functions of Mana Whenua in conditions KGG1-KGG6 and SCP1-SCP4.

APPENDIX 2: TE MANAHUNA SOLAR FARMS

Kāi Tahu are aware of nine solar farm developments that are proposed in Te Manahuna. The proposed solar farms that are to be considered through the Fast Track process or through the RMA process are identified in Table 2 below.

Table 2: Solar Farms Proposed for Te Manahuna.

Number on Aerial	Project Name	Solar Farm Size	Land Area	Colour on Map	Process – Fast Track / RMA
1	Lodestone Energy– Haldon Solar	180 MW	320 ha	Orange	Fast Track (listed)
2	Far North Solar Farm – The Point Solar Farm	450 MW	670 ha	Yellow	Fast Track (listed)
3	Nova Energy– Twizel Solar Project	300 MW	868 ha	Purple	Fast Track (referral)
4	Helios Energy – Grampians Solar Project	300 MW	574 ha	Aqua	Fast Track (referral)
5	Simpsons – Balmoral Station Solar Array	88 MW	113 ha	Dark Purple	Fast Track (listed)
6	Far North Solar Farm – Ōhau A (area has been defined)	280 MW	281 ha	Blue/Grey	Undetermined
7	Douglas McIntyre – Twizel Solar	280 MW	791.36 ha	Orange	RMA – Consents have been lodged with Waitaki DC and Environment Canterbury
8	Contact Energy (previously Manawa Energy – Irishman Creek Station (extent is currently unknown)	220 MW	500 ha	Green	Undetermined
9	Kakariki Renewables – Grays Hills Staton	1,800 MW	2,150 ha	Grey	Undetermined

APPENDIX 3: RECORD OF CONSULTATION

Date/ Consultation Type/ Purpose	Location (if applicable)	Attendees	Key Matters Discussed/ Outcomes
4 November 2025 – In-person meeting Purpose: To discuss a potential way forward following Nova’s review of feedback on the Fast Track Referral Application.	Te Runanga o Ngai Tahu Office, 15 Show Place, Christchurch	Karl Russell, Kylie Hall and Ally Crane (AECL) Lisa MacKenzie (TRoNT) Bob Warnock and Melany Hunt (Nova Energy representatives)	• Environmental protection and mitigation – Rūnaka emphasised the need for targeted mitigation measures addressing threatened species, soil health, water quality, and cultural values, to be reflected in the application, management plans, and consent conditions. • Threatened species – Project design should prioritise avoidance, with mitigation and management where effects cannot be avoided. Nova advised that ecological work to date has focused on avoiding effects through design. • Soil and water quality – Nova confirmed a commitment to maintaining soil and water quality, including proposed consent conditions for monitoring and sampling. • Lizard and skink management – Surveys have been undertaken and draft management plans prepared. • Eco-sourcing and mitigation planting – Rūnaka recommended eco-sourcing native plant species to improve establishment success. Engagement with the Arowhenua nursery would be undertaken via AECL. • Consent conditions – Outcomes should be clearly articulated and secured through robust consent conditions. • Landscape and cultural values – Rūnaka highlighted the importance of protecting cultural landscapes, including connections between ancestral trails and waterways. • Cultural effects and engagement – The importance of developing cultural narratives was noted, along with challenges associated with fragmented engagement. The project was identified as an opportunity to establish a benchmark for similar developments. • Cumulative effects – Acknowledged as complex but requiring appropriate consideration. Outcome: Further hui will be held with Moeraki and Waihao Rūnaka to ensure a consistent understanding of the project and to convey initial feedback. A full

			Rūnaka hui with Nova will be arranged following these discussions.
12 November 2025- Online meeting (MS Teams) Purpose: To discuss a potential way forward following Nova's review of feedback on the Fast Track Referral Application.	N/A	Trevor McGlinchey (Moeraki) Tim Vial (Aukaha) Amy Beran (TRoNT) Bob Warnock and Melany Hunt (Nova Energy)	- Nova provided a progress update on the development of the solar farm application. - Project lifecycle – Confirmed to be at least 30 years. - Environmental management – Overview of draft mitigation strategies, including soil and water quality and threatened species management. - Cultural effects – Matters raised at the previous hui were discussed. - Long-term outcomes and opportunities – Employment, local business opportunities, and environmental enhancement through ongoing collaboration and monitoring were discussed. - Consent conditions – It was noted that, where possible, consensus should be reached prior to lodgement, with feedback incorporated into proposed conditions. Outcome: Dates and format for the next hui involving Rūnaka, Nova, and TRoNT will be confirmed and scheduled prior to the Christmas break.
10 December 2025- In person meeting (12:30pm-3pm) Purpose: For Mana Whenua to collectively engage with Nova to better understand the project and opportunities for involvement prior to submission of the substantive application, and to further discuss Mana Whenua perspectives and concerns.	Te Runanga o Ngai Tahu Office, 15 Show Place, Christchurch	Trevor McGlinchey (Moeraki) Tim Vial (Aukaha) Amy Beran and Deidre Francis (TRoNT) Karl Russel, Kylie Hall and Ally Crane (AECL) Bob Warnock and Melany Hunt (Nova Energy representatives)	- Project effects and opportunities – Rūnaka outlined concerns and opportunities, including potential adverse impacts on fauna, flora, soils, visual amenity, access to landscape, nohoaka, and cumulative effects. - Positive aspects – Clean energy generation, reduced land-use intensity compared to pastoral farming, economic opportunities, and environmental enhancement potential were identified. - Application progress – Nova advised that draft management plans (including invertebrates, biosecurity, avifauna, and lizards) were underway but not yet ready for circulation. - Agency engagement – Ongoing discussions with DOC were noted. - Programme – Lodgement of the substantive application anticipated in Q2 2026. - Pest management – Nova confirmed funding for wilding pine control provided to DOC.

			- Investment opportunities – Rūnaka expressed interest in potential involvement. - Ongoing engagement – Rūnaka acknowledged and supported continued engagement as the project progresses. Outcome- Agreement to continue engagement as further information becomes available and as Nova responds to feedback provided by Rūnaka.
10 February 2026- In person meeting Purpose: To provide an update on progress with the substantive application and to further discussions on establishing a long-term working relationship.	Te Runanga o Ngai Tahu Office, 15 Show Place, Christchurch	Trevor McGlinchey (Moeraki) Tewera King (Waihao) Tim Vial (Aukaha) Amy Beran and Deidre Francis (TRoNT) Karl Russel, Kylie Hall and Ally Crane (AECL) Bob Warnock and Melany Hunt (Nova Energy representatives)	- Application development – Nova is progressing the draft substantive application and aligning it with Fast-track requirements. - Planning context – Consideration of updated national direction, including natural hazards. - Approvals framework – Overview of approvals required for the project. - Cumulative effects – Rūnaka expressed interest in understanding the relationship between multiple solar farm developments. - Governance and involvement – Support expressed for a governance role to enable ongoing Mana Whenua involvement. - Enhancement and mitigation – Interest in participating in planting and input into draft management plans. - Consent conditions – Enhancement measures, including lizard habitat, discussed. - Programme – Lodgement targeted for late April 2026. Outcome: Draft substantive application to be provided for review. Nova will continue to share information as it becomes available, including examples of iwi partnership models. Technical reports will be provided to enable review and potential peer review.
April 2026- Email correspondence		Various correspondence between Nova, Rūnaka (via AECL and Aukaha), and TRoNT	- Nova confirmed anticipated lodgement timing (late April). - Rūnaka sought continued opportunities for input prior to lodgement. - An update to the Mana Whenua Report was recommended to reflect more detailed project information and assessment findings. - A formal letter of feedback was provided by Rūnaka and TRoNT, raising concerns

			regarding potential deviation from the agreed consultation approach. Nova agreed to delay lodgement to enable further consultation and review of detailed project information. Outcome: Lodgement timeframe extended to allow for additional engagement and input from Rūnaka and TRoNT.
5 May 2026- Online meeting (MS Teams) Purpose: For Nova to outline revised timeframes and process for lodgement, and to discuss feedback provided by Rūnaka (including the Mana Whenua Report).	N/A	Tim Vial (Aukaha) Amy Beran (TRoNT) Kylie Hall (AECL) Bob Warnock and Melany Hunt (Nova Energy representatives) BTW Company: Cam Twigley- Director, Planning and Environment Trent Lynch- Planner	- Nova acknowledged timing pressures and delays in providing information and committed to ongoing collaborative engagement. - Rūnaka advised that while the cultural context remains unchanged, an update to the Mana Whenua Report is appropriate given the availability of detailed project information. - Nova confirmed a delay to lodgement to allow further consultation and input. - SASM provisions will be assessed as part of the application. - Further technical reports (including ecological documentation) will be provided. - TRoNT agreed to share draft Mana Whenua-specific consent conditions developed for similar projects. Outcome: AECL to commence updating the Mana Whenua Report. Draft conditions to be shared with Nova. Ongoing information sharing to continue, with weekly meetings to be established ahead of the revised lodgement date of 22 May 2026.
12 May 2026 – Online meeting (MS Teams) Purpose: To continue discussion of project information and consider environmental management approaches and proposed consent conditions in further detail.	N/A	Tim Vial (Aukaha) Amy Beran (TRoNT) Kylie Hall (AECL) Bob Warnock and Melany Hunt (Nova Energy representatives) BTW Company: Cam Twigley- Director, Planning and Environment Trent Lynch- Planner	- Avifauna effects – Detailed discussion on mortality thresholds and triggers for management response. - Monitoring quality – Rūnaka and TRoNT emphasised that robust collision monitoring is critical to establishing appropriate triggers. - Threatened species – Concerns raised regarding impacts on species with low population numbers. - Cumulative effects – Potential combined effects across multiple solar farm developments discussed. - Response timeframes – Concern noted regarding delays between trigger events and implementation of management responses.

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- Offsetting/compensation – Upfront compensation identified as a potential approach to address habitat loss or effects.
 - Consent conditions – Nova expressed general support for Mana Whenua conditions, with further refinement proposed to improve clarity and enforceability.
 - SASM – To be addressed within the Mana Whenua Report.

Outcome:

Nova to provide additional ecological documentation, including an integrated management framework and wildlife permit conditions. Updated draft consent conditions to be circulated. Rūnaka to continue progressing updates to the Mana Whenua Report ahead of the next meeting.

20 May 2026- Online meeting (MS Teams) - -
Purpose: final discussions on any outstanding matters ahead of the revised submission date for the substantive application

UPCOMING CONSULTATION.