

BEFORE THE PANEL CONVENER

IN THE MATTER of the Fast-Track Approvals Act 2024 (FTAA)

AND

IN THE MATTER of an application by Far North Solar Farm Limited
under section 42 of the FTAA for the construction
of a solar farm

APPLICATION NO. FTAA-2509-1100

**MEMORANDUM FROM TE RŪNANGA O NGĀI TAHU RESPONDING TO MINUTE TWO OF
THE PANEL CONVENOR**

13 November 2025

Maru Rout
Programme Leader - Mauri
Te Rūnanga o Ngāi Tahu
15 Show Place, Addington

[REDACTED]
[REDACTED]

Response to Minute 1 of the Panel Convenor: Convenor's Conference 1 [FTAA-2508-1097]

This memorandum is filed on behalf of Te Rūnanga o Ngāi Tahu in advance of the convenor's conference scheduled for Monday 17 November 2025 at 10 am.

The Minute seeks participant views prior to a convenor's conference, that will inform the decision of the Convenor regarding:

- a. Appointment of Panel Members.
- b. The timing of the panel decision.

Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) which is the statutorily recognised representative tribal body of Ngāi Tahu Whānui, as provided by section 15 of the Te Rūnanga o Ngāi Tahu Act 1996 (**TRONT Act**).

Te Rūnanga encompasses five hapū, Kati Kurī, Ngāti Irakehu, Kati Huirapa, Ngāi Te Ruahikihiki, Ngāi Tūāhuriri and 18 Papatipu Rūnanga, who uphold the mana whenua and mana moana of their respective rohe.

Papatipu Rūnanga who have shared interest in Te Manahuna are:

1. Te Rūnanga o Arowhenua
2. Te Rūnanga o Moeraki
3. Te Rūnanga o Waihao

Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā which covers most of Te Waipounamu and its surrounding islands, constituting over half of New Zealand's landmass, coastlines and waterways.

Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui "for all purposes", Te Rūnanga accepts and respects the right of Papatipu Rūnanga to make their own responses. Te Rūnanga understands that respective Papatipu Rūnanga (and their Regional Environmental Entities) have been separately invited to attend the Panel Convenor Conference.

While the timetable proposed by the Regional Council (Environment Canterbury), in their response to Minute 2 is likely sufficient, TRoNT considers that additional time may be needed to engage with the applicant (as detailed in the issues section below). If the applicant is agreeable, additional time to enable further engagement to take place could be provided by delaying the commencement of the Expert Panel (once appointed).

Like other substantive applications for large scale solar farm in Te Manahuna/Mackenzie Basin (and progressing under the FTAA), TRoNT considers that there may be some complex legal issues with this application. TRoNT has concerns about how to manage the cumulative effects of all these applications. There is a need to understand cumulative effects and in particular the cumulative effects on the cultural landscape and settlement matters.

In addition to the above, there is also a need to understand the visual impacts on the Nohoanga Entitlement that is located in the Haldon Arm of Te Ao Marama / Lake Benmore.

Issues:

- Far North Solar Limited did not consult with TRoNT prior to lodging their substantive application. As a result, TRoNT has not had an opportunity to directly input into the application (including review draft conditions or technical

reports) or determine matters of particular concern/ importance. Notwithstanding, the following matters have been identified by TRoNT and along with the matters separately identified by mana whenua, may serve as a starting point for further engagement with the applicant (prior to comments being made on the application):

- The application has not addressed the cumulative impact of having three solar farms in close proximity to each other, particularly on settlement matters.
- While the application identifies visual effects, it has not specifically addressed the effects on the nohoanga site in the Haldon Arm, including:
 - whether the site will be visible from the nohoanga site or from pathways accessing the nohoanga site;
 - how it may impact on the ability of Ngāi Tahu Whānui to use the nohoanga site; and
 - how it may impact on the ability of Ngāi Tahu Whānui to connect to the surrounding area as intended under settlement.
- There is uncertainty over whether the applicant has identified all taonga species, listed in the Ngāi Tahu Claims Settlement Act 1998 (NTCSA), present in the site, and whether any potential adverse effects on any taonga species have been addressed.
 - The desktop assessment and field survey of avifauna appears to have focused on threatened and at-risk species with no specific commentary on taonga species. The application identifies the potential for the site to provide potential foraging and breeding habitat for kaki/black stilt and the potential presence of Pihoihoi/NZ pipit, both of which are settlement taonga species¹. It is also noted that the application includes an ecological enhancement programme including areas to promote avi-fauna, and in particular the Kaki/Black Stilt.
- Te Ao Marama/Lake Benmore is a statutory acknowledgement area. The application talks about managing stormwater and drainage water through bunding, soakpits and infiltration to groundwater. The application concludes that there will be no adverse effects on the environment, but there is no explicit statement that that this conclusion incorporates a consideration of the status of Te Ao Marama/Lake Benmore as a statutory acknowledgement area and any risk of stormwater discharges entering the lake via surface water and/or groundwater. This is also important when considering the intent of Nohoanga entitlements².

Advice on mātauranga and tikanga will be provided by mana whenua.

Panel membership:

Knowledge, skills and expertise required:

- a. Understanding of Ngāi Tahu values, worldviews and tikanga particularly given the significance of the area and surrounding landscape to Ngāi Tahu. Understanding

¹ Not all species Ngāi Tahu Whānui consider taonga have been listed within schedule 97 of the NTCSA

² Ngai Tahu Claims Settlement Act 1998 s256 (2) Nohoanga entitlements are created and granted for the purpose of permitting members of Ngai Tahu Whanui to occupy temporarily land close to waterways on a non-commercial basis, so as to have access to waterways for lawful fishing and gathering of other natural resources.

of statutory acknowledgment and deed of recognition over Te Ao Marama/Lake Benmore and the nohoanga entitlement that is within proximity to the application area and cumulative effects on these values.

- b. Landscape expert – need to consider cumulative effects on landscape, including visual effects and natural landscape.
- c. Ecologist – need to understand specific potential effects on taonga species (flora and fauna) and particular potential effects on avifauna.
- d. Water Quality/Quantity expert – to understand effects of stormwater discharges to groundwater and potentially surface water entering Te Ao Marama/Lake Benmore.

Amy Beran [REDACTED] will be representing Te Rūnanga o Ngāi Tahu at the conference on Monday 17 November 2025 at 10:00am.

Dated on: 13 November 2025



Maru Rout
[REDACTED]