

**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

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**MEMORANDUM RESPONDING TO MINUTE TWO OF THE PANEL CONVENOR ON  
BEHALF OF TE RŪNANGA O WAIHAO AND TE RŪNANGA O MOERAKI**

13 November 2025

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Tim Vial

Kaiwhakamahere Matua (Senior Planner) Mana Taiao

Aukaha (1997) Limited

Level 2, 266 Hanover Street

Dunedin 9054/ PO Box 446

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## Introduction

1. This memorandum is filed on behalf of Te Rūnanga o Waihao (Waihao) and Te Rūnanga o Moeraki (Moeraki) in response to Minute 2 of the Panel Convener dated 6 November 2025 (Minute), regarding the Far North Solar Farm Limited application for the Point Solar Farm.
2. The takiwā of Te Rūnanga o Waihao centres on Wainono, sharing interests with Te Runanga o Arowhenua to Waitaki, and extends inland to Ōmārama and the Main Divide.
3. The takiwā of Te Rūnanga o 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 Rūnanga in Te Manahuna (Mackenzie Basin) and Tuawhenua (Queenstown Lakes and Central Otago)
4. Te Rūnanga o Waihao and Te Rūnanga o Moeraki represent hapū who uphold the mana of the whenua in Te Manahuna. Within this area, Waihao and Moeraki have maintained noho tūturu (ahi kā), meaning the tribe's 'fires' have been kept burning and that they actively exercise rangatiratanga.
5. Aukaha are mandated to provide advice and act on behalf of Moeraki and Waihao 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 Aukaha is available to attend the scheduled conference(s).
6. The Minute seeks participant views prior to a Convenor's Conference on Monday 17 November 2025, that will inform decisions of the Convenor regarding:
  - a) Appointment of Panel Members.
  - b) The timing of the panel decision.
  - c) Matters to consider when preparing for the conference

### **Issue (a) Appointment of Panel Members**

7. Waihao and Moeraki consider it is highly desirable that at least one member of the panel have expertise in Ngāi Tahu tikanga, given the significance of Te Ao Marama / Lake Benmore and the wider Waitaki area to Ngāi Tahu.
8. Waihao and Moeraki are open to working with Te Rūnanga o Ngāi Tahu, Te Rūnanga o Arowhenua, Aoraki Environmental Consultancy Limited (AECL), and Environment Canterbury to identify an appropriate candidate.

### **Issue (b) – Timing of the Panel Decision**

9. Waihao and Moeraki are satisfied with the default timeframes, however it should be noted that sufficient time will be needed to consider further information requested by the Panel and to consider draft consent conditions.
10. The time required to comment on further information provided by Far North Solar Farm Limited and draft conditions will depend on the complexity and the extent to which matters remain in contention.

### **Issue (c) – Matters to be considered**

11. The Waitaki unites all Ngāi Tahu. Ngāi Tahu have an intergenerational commitment to upholding the health and wellbeing of the Waitaki from Aoraki to the sea.
12. It is considered that there may be legal complexity in relation to this application: There are three large solar farms proposed to be established within the Haldon Arm of Te Ao Marama / Lake Benmore in close proximity to each other. The management of the cumulative effects of these fast-track applications is an issue for Waihao and Moeraki.
13. The cumulative effects on the cultural landscape as experienced by the tūpuna and the effects on access to the nohoanga entitlements within the Haldon Arm are of particular concern for Waihao and Moeraki.
14. The site is located within Sites and Areas of Significance to Māori (SASM) under the Mackenzie District Plan (MDP). Te Ao Marama / Lake Benmore is a Statutory Acknowledgement Area under the Ngāi Tahu Claims Settlement Act 1998.
15. It is noted that the substantive applications filed by Far North Solar Limited sets

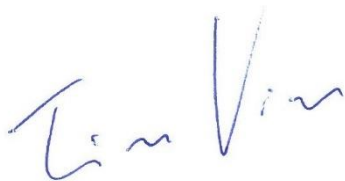
out a consultation record with relevant Ngāi Tahu rūnaka. To date, very little consultation has taken place between Far North Solar Limited, Waihao, Moeraki and Aukaha. Waihao, Moeraki and Aukaha were not notified by Far North Solar Limited of their intent to have their proposal listed with the Environmental Protection Agency (EPA).

16. Due to the limited consultation to date, Waihao, Moeraki and Aukaha have been unable to ascertain the extent of issues in contention or other disputed matters, whether the drafting of proposed consent conditions are sufficient, and whether cultural, ecological and cumulative effects can be adequately resolved, particularly the impacts on taonga species. In addition to these matters, Waihao and Moeraki have not had any discussions with Far North Solar Limited as to how Mātauranga Māori could be incorporated into the proposal.

## **CONCLUSION**

17. Aukaha confirms it will be in attendance for the convenor's conference on Monday 17 November 2025 at 10:00am:

Dated on: 13 November 2025



Tim Vial

Kaiwhakamahere Matua (Senior Planner)