

BEFORE THE EXPERT PANEL

IN THE MATTER of the Fast-Track Approvals Act 2024 (FTAA)
AND
IN THE MATTER of an application by Far North Solar under section
42 of the FTAA for the construction of a solar farm
APPLICATION NO. FTAA-2509-1100

**TE RŪNANGA O MOERAKI AND TE RŪNANGA O WAIHAO
RESPONSE TO INVITATION FOR COMMENTS BY THE EXPERT PANEL**

19 February 2026

Address for Service:

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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	And travelling the ancient path to the mountain,
mai i Te Ruataniwha ki Te Ao Marama!	And then to the world of light, Te Ao Marama
Nā te wharenuī o Te Whakaahua-a-raki nō Te Maiharoa	And on to the place of the whare of the chief,
Te Maiharoa Ko Te Poho o Rakitāmau,	And the burial mound on Māori Hummock
Mai i Te Kai Hikihiki, ki Ōtamatakou,	And on to Otematata
Ki Te Wharekuri, ki Te Awakino	And Te Wharekuri and Te Awakino
mai i Te Kohurau, ko Oteake	And the mountain Te Kohurau and the place, Oteake
mai i Ote kai ake, ko Te Maerewhenua	And Ote kai ake and Duntroon
mai i Te Awamoko, ki Te Puna o Maru	On to Te Awamoko and the settlement of Te Puna a Maru
ko Korotuaheka te kaika tūturu, i tū ai te whare Tapu o Matiti	And finally arriving at the Waitaki River mouth and the house Matiti

David Higgins (Upoko), Tewera King (Upoko)

INTRODUCTION

1. This written reply has been prepared by Aukaha in accordance with section 53(2) of the Fast Track Approvals Act 2024 on behalf of Te Rūnanga o Moeraki (Moeraki) and Te Rūnanga o Waihao (Waihao) in response to the invitation for comments (Minute 2) by the Expert Panel (dated 21 January 2026), regarding the Far North Solar Fast Track application for The Point solar farm.
2. The Point solar farm is located within the shared takiwā of Te Rūnanga o Moeraki (Moeraki), Te Rūnanga o Waihao (Waihao) and Te Rūnanga o Arowhenua.
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). The takiwā of Te Rūnanga o Waihao centres on Wainono, sharing interests with Te Rūnanga o Arowhenua to the Waitaki, and extending inland to Ōmārama and the Main Divide.
4. Aukaha is a mana whenua owned organisation that delivers services across the takiwā of our Papatipu Rūnaka shareholders, which include Moeraki and Waihao.
5. Aukaha works alongside Aoraki Environmental Consultancy Limited (AECL) who are representing Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu (Te Rūnanga) planning staff on the Fast Track Projects within Te Manahuna (Mackenzie District).
6. Te Rūnanga o Moeraki and Te Rūnanga o Waihao support the comments of Te Rūnanga o Arowhenua (Arowhenua) and Te Rūnanga o Ngāi Tahu (Te Rūnanga) on this fast-track consent application. Rather than repeating those comments, these comments on behalf of Moeraki and Waihao seek to complement and expand on those comments.
7. These comments on behalf of Moeraki and Waihao should not be read in isolation nor are they intended to lessen the messaging of the comments prepared by AECL on behalf of Arowhenua and Te Rūnanga.

POSITION OF TE RŪNANGA O MOERAKI AND TE RŪNANGA O WAIHAO

8. Moeraki and Waihao **oppose** this fast-track consent application, and take a precautionary approach because of outstanding concerns regarding the potential adverse effects of the Point

Solar Farm on cultural values including the values of wāhi tūpuna landscapes, landscape character, biodiversity, wai māori, and access to traditional sites and resources

9. Further engagement with Far North Solar is sought to clarify or narrow outstanding issues, refine the conditions of consent, and to provide certainty that the cultural effects of the Point Solar Farm will be mitigated for the duration of the consent (if granted).

HE MANAWA KĀI TAHU: MANA WHENUA VALUES

10. Mana whenua values provide a cultural framework for whānau to identify and communicate te ao Māori perspectives. Values identified by mana whenua provide a cultural baseline that is derived from the natural state of the environment, which can be used as a tool for assessing the impact of an environmental event or activity.
11. For Kāi Tahu,¹ the wellbeing of the people and the wellbeing of the environment are integrally linked. The values framework set out below emphasises this interconnectedness and the expression of these values across the environmental, cultural, social, and economic spheres.

	Mana	Mauri	Tapu and Noa	Whakapapa
Value	<i>Longevity, ongoing influence and leadership in our community</i>	<i>Health and wellbeing, not only in people but also in the land and waterways</i>	<i>The protection of resources, people and particular areas, enabling us to look forward sustainably</i>	<i>Respecting people and whakapapa Taking the past with us; whakapapa is forever generative</i>
Key Intent	The mana of Kāi Tahu is upheld within their takiwā, including by upholding the mana of te taiao and by upholding and restoring intergenerational connections with wāhi tūpuna.	The mauri of whenua, wai and native species is restored and enhanced including within the site and in the Haldon Arm of Te Ao Mārama (Lake Benmore).	Balance is restored, and the future of our people and resources are protected.	The traditional authority of mana whenua is recognised through partnerships based on reciprocity and respect.

¹ In the South Island, the local Māori dialect uses a 'k' interchangeably with 'ng'. So Kāi Tahu, rather than Ngāi Tahu.

Environmental	Kāi Tahu are leaders in the management of our natural resources and built environment.	Mātauraka is incorporated through the co-design and co-management of our environment and resources	The environment is regenerated, and a sustainable future is secured.	Te Ao Māori informs policy, planning and decision-making
Cultural	Kāi Tahu will participate and demonstrate leadership in the community.	Kāi Tahu heritage and culture is visible, celebrated, protected and future proofed.	Communities, resources and customary practices are protected through responsible regulatory measures and processes.	Kāi Tahu values frameworks are embedded within consent conditions, restoration initiatives and infrastructure design and development.
Social	Kāi Tahu will have access to opportunities that enable social equity.	Whānau are thriving and connected with the whenua and wai, and with wāhi tūpuna.	Kāi Tahu are guided by tikaka and kawa (protocols) for the wellbeing of our whānau and wider community.	The social impacts of the Point Solar Farm are managed to meet the cultural needs, practices and values of whānau.
Economic	Kāi Tahu are active across all sectors of the economy.	Economic directions consistently enhance outcomes and equality for Kāi Tahu.	The Kāi Tahu economy is recognised as a critical part of our collective wellbeing.	Kāi Tahu networks are well connected and supported to build a prosperous future.

12. Mātauraka underpins the definitions of mana whenua values. Every iwi, every hapū, every Rūnaka, has its own understanding of these values and their application, based on the mātauraka handed down to them through whakapapa.
13. The assessment of Kā Rūnaka (Arowhenua, Waihao and Moeraki) consultation about The Point solar farm prepared by Dee Isaacs² was not informed by Kāi Tahu mātauraka nor was it mandated by mana whenua. Moeraki and Waihao strongly assert that this assessment cannot be relied upon by Far North Solar.

² Appendix Q Mana Whenua Consultation

RAKATIRATAKA AND KAITIAKITAKA

14. Kāi Tahu, as noted, do not see their existence as separate from te taiao (the natural world), but as an integral part of it. From creation ultimately all things in the universe are interconnected and they share a single source of spiritual authority. This spiritual force is the origin of mana and tapu. Mana is the word used to describe the authority and prestige that originates from the atua and is passed down through lines of whakapapa that originated with the creation of the world.
15. The exercise of mana gives rise to rights and responsibilities in relation to the natural environment, which must be kept in balance. This is expressed through the concepts of rakatirataka and kaitiakitaka, which are the means through which mana is exercised in the natural world.
16. Rakatirataka refers to the exercise of mana to give effect to Kāi Tahu culture and traditions in accordance with tikaka. In the management of the natural world, rakatirataka is underpinned by the obligations placed on mana whenua as kaitiaki. The duty of kaitiakitaka is not merely about guarding or caretaking, it involves acting as an agent for environmental protection and decision-making, on behalf of tūpuna and mokopuna.
17. The right of mana whenua to oversee land, resources, aspirations and wellbeing was protected under the Treaty of Waitangi, and this right still exists today, as recognised by the Kāi Tahu Settlement.

EXERCISE OF RAKATIRATAKA WITHIN THE UPPER WAITAKI AND TE MANAHUNA

18. Kāi Tahu has a long history of active engagement with the Waitaki spanning over eight centuries. The Upper Waitaki and Te Manahuna remains of paramount importance to Kāi Tahu. As mana whenua, the members belonging to the three Papatipu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki (collectively mana whenua) have a responsibility to assess how the development of solar farms in Te Manahuna will impact their rights, values and practices.
19. The Upper Waitaki and Te Manahuna lies under the cloak of mana whenua rakatirataka and is cared for and managed by mana whenua to the greatest extent possible, in a manner consistent with kaitiakitaka. Mana whenua wish to develop a constructive relationship with Far North Solar that furthers the practical recognition of their rights, responsibilities and obligations to the whenua and wai māori.

20. The issues and impacts associated with the development of solar farms in Te Manahuna are not confined to maintaining the existing environment. Maintaining the current state of a highly modified catchment is not an option as mana whenua firmly believe that the whenua and waters of the Upper Waitaki and Te Manahuna need to be restored, enhanced and protected. The concern is that a narrow focus on the whenua most affected by the development of infrastructure to produce electricity could result in options for restoration and enhancement of mahika kai and Kāi Tahu connections with whenua and wai being lost or limited.
21. When assessing the impacts of the Point Solar Farm on their rights beliefs and practices, mana whenua cannot only focus on the impact on the current generation. Using mahika kai as an example; mana whenua have the right to benefit from mahika kai sourced from the catchment if they protect the integrity of what makes the Waitaki a mahika kai pātaka.³ Ensuring that future generations can thrive is therefore a key focus.
22. In summary, mana whenua have approached discussions with Far North Solar intending to set a pathway whereby adverse effects will be addressed, and an agreed package of interventions is implemented that will achieve intergenerational outcomes.

WAITAKI IWI MANAGEMENT PLAN

23. The Waitaki Iwi Management Plan 2019 was collaboratively developed by Moeraki, Waihao and Arowhenua as an expression of rakatirataka and in fulfilment of their kaitiaki responsibilities within Waitaki Catchment.
24. The vision of the Waitaki Iwi Management Plan is to:

“Ka whakawhārikitia e tātou te huarahi mō rātou ā muri ake nei, kia takahia kā tapuwae o kā tīpuna.”

“Walk in the footsteps of our tūpuna and in doing so set a future pathway for our moko.”
25. The protection of wāhi tupuna and the relationship that mana whenua have with these landscapes is a strategic objective of the plan. Far North Solar concludes that the project is consistent with the strategic objectives identified in this plan.⁴ This conclusion was not informed by engagement with mana whenua and is at best optimistic.

³ Storehouse

⁴ Far North Solar, Substantive Application, Section 7.10.

26. Far North Solar, mana whenua and Te Rūnanga o Ngāi Tahu are continuing to explore opportunities that will enable the protection of the values of these landscapes and the exercise of rakatirataka by mana whenua

POSITIVE ASPECTS ASSOCIATED WITH SOLAR

27. Moeraki and Waihao would like to emphasise to the Expert Panel that mana whenua are not opposed to the development of solar farms. Mana whenua support the development and construction of renewable energy in Te Manahuna in preference to the construction of large dam structures that flood and alter key/unique ecological, social, economic and cultural landscapes.
28. While Moeraki and Waihao support renewable energy proposals, mana whenua are also of the belief that such activities need to be in appropriate areas where the impacts of that infrastructure is avoided or appropriately mitigated, including the visual and physical impacts, the impact on the mana whenua relationship with wāhi tūpuna landscapes, and the impact on cultural redress returned through the Kāi Tahu Settlement.

ENGAGEMENT WITH FAR NORTH SOLAR

29. The full details of engagement between Far North Solar, Te Rūnanga o Ngāi Tahu, Te Rūnanga o Moeraki, and Te Rūnanga o Waihao are set out in the comments made by AECL and Te Rūnanga. Both Moeraki and Waihao concur with that summary of engagement with Far North Solar.
30. The consultation that took place between Far North Solar, Aukaha, Moeraki and Waihao related to the resource consent application that was submitted to Mackenzie District Council prior to the FTAA existence. That engagement ceased abruptly due to a lack of understanding by Far North Solar of mana whenua perspectives and values.
31. Aukaha can confirm that no interaction took place between Far North Solar, Aukaha, and mana whenua after 7 November 2023. Therefore, Far North Solar did not consult with Aukaha and mana whenua on the Fast Track application. A copy of the substantive application was not provided to Aukaha and mana whenua prior to the Convenor Conference.

FURTHER ENGAGEMENT WITH FAR NORTH SOLAR AND PROPOSED MECHANISMS

32. Moeraki and Waihao concur with Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu that appropriate mechanisms to manage, avoid, remedy, or mitigate potential adverse cultural

effects should be secured through the consent conditions (should the resource consents sought through the substantive application be approved). In this context, the establishment of a Kaitiaki Governance Group (KGG) and a Cultural Monitoring Programme (CMP) as conditions of consent is strongly supported by Moeraki and Waihao.

33. These mechanisms would provide a framework for mana whenua to exercise rakatirataka and kaitiakitaka, including involvement in monitoring the cultural and environmental effects of the Point Solar Farm, and advising on measures to avoid, remedy, or mitigate any identified adverse effects. Inclusion of these conditions would help ensure that cultural values are actively recognised and provided for, and that monitoring and reporting obligations are implemented for the duration of the project. Further, these mechanisms provide an opportunity for mana whenua to breathe life into their inter-generational relationship with Te Manahuna.

CONCLUSION

34. Moeraki and Waihao thank the Expert Panel for the invitation to comment on the substantive application prepared by Far North Solar for the Point Solar Project.
35. Te Rūnanga o Moeraki and Te Rūnanga o Waihao **oppose** this substantive application. This position is based on a precautionary approach to this substantive application.
36. However, Te Rūnanga o Moeraki and Te Rūnanga o Waihao understand that Far North Solar is committed to building a long-term relationship with mana whenua and is open to further engagement on the matters raised in these comments.
37. Te Rūnanga o Moeraki and Te Rūnanga o Waihao welcome the opportunity to continue working with AECL, Te Rūnanga o Arowhenua, Te Rūnanga o Ngāi Tahu, and Far North Solar to address the matters raised, including the development of consent conditions that enable mana whenua to exercise rakatirataka and kaitiakitaka, protect cultural values and safeguard wāhi tūpuna landscapes, should consent be granted.

Nāku noa, nā



Cory Neale

Chief Executive, Aukaha

Dated: 19 February 2026