



# TE AO MĀRAMA INC.

17 December 2025

Southland Wind Farm Project  
Private Bag 63002  
Waterloo Quay  
Wellington 6140  
**Via email:** [substantive@fasttrack.govt.nz](mailto:substantive@fasttrack.govt.nz)

Tēna koe

## **FTAA – 2504 – 1041: Southland Wind Farm : Comments on Substantive application request under Fast-Track Approvals Act 2025**

Thank you for giving notice of the invitation to comment on the Southland Wind Farm application under Section 53(3) of the Fast-Track Approvals Act 2025. We acknowledge that comments are due on 17 December 2025.

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

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

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

### **Ngāi Tahu Claims Settlement Act 1998 – Principles and Provisions**

The Fast Track Approvals Act 2025 requires applicants to identify the relevant principles and provisions of Treaty Settlements. These are the foundations and guiding concepts of what the Ngāi Tahu Settlements are based on. There are a number of principles and provisions contained within these Settlements.

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

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

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

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

### **Substantive Application Comment**

Overall, the purpose of this letter of comment is to preserve the ability for Ngāi Tahu ki Murihiku (via Te Ao Mārama) to be involved in potential changes to established and agreed conditions. Specifically, this letter of comment addresses proposed changes to the Archaeological Authority conditions as requested by Heritage New Zealand Pouhere Taonga (HNZPT) in their Section 51 report.

We note the suggested amendments to the applicants' proposed Archeological Authority conditions by HNZPT in their Section 51 Report and confirm the following.

- Ngāi Tahu ki Murihiku **do not support** the conditions as proposed by HNZPT in their Section 51 report.
- Ngāi Tahu ki Murihiku have actively engaged with the applicant in respect of the contents of the Section 51 Report and have proposed amendments to the applicant's Archaeological Authority conditions to address HNZPT issues.
- Ngāi Tahu ki Murihiku **support** the applicant's proposed Archeological Authority Approvals Application as submitted with the substantive application (**attached Appendix 1**).
- Ngāi Tahu ki Murihiku **support** the proposed **updated** Archeological Authority Approval Conditions (**attached Appendix 2**) as proposed by the applicant. These take into consideration the HNZPT position.

In summary we consider the **updated Archeological Authority Approval Conditions** (attached Appendix 2) proposed by Contact Energy reflect the long-term engagement and agreement that has occurred between Ngāi Tahu ki Murihiku and the applicant. These conditions address the impact of the proposed activity on the identified cultural values outlined in the Cultural Impact Assessment (**attached to the applicants 'Overarching Substantive Application Document' at page 21**). To change these conditions at this stage would undermine the relationship and mitigation measures put in place to address the concerns of iwi.

We further note that overall, changes to any proposed conditions will have the potential to undermine the engagement and agreement between the applicant and Ngāi Tahu ki Murihiku to address adverse cultural effects. We therefore request that should any other changes occur Ngāi Tahu ki Murihiku is actively engaged and consulted.

In summary Ngāi Tahu ki Murihiku and Te Rūnanga have no objections to this substantive application provided the substantive application continues to be made on substantially the same basis as the application made to the EPA for the Southland Wind Farm Project, originally processed under the COVID-19 Recovery (Fast Track Consenting). We will continue to work closely with Contact throughout the Fast-track Approvals Act process.

We reserve the right to provide further comment.

Nākau noa nā

*D. Whaanga*

Dean Whaanga  
**Kaiwhakahaere Kaupapa Taiao**



**TE AO  
MĀRAMA INC.**

CC: Ngā Rūnanga – Papatipu Rūnanga Chairs

Encl:

Appendix 1 – EO1 – Part-E-Archaeological-Authority-Approvals-Application – Substantive Application

Appendix 2 – SWF Contact Proposed Archaeological Authority Conditions – 11 December 2025

