

**Table 1. Assessment of The Point Solar Farm against SASM Provisions.**

PROVISION	FNSF ASSESSMENT	RŪNAKA AND TRONT COMMENTS
<p>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></p>	<p>No assessment provided by the applicant in relation to this objective.</p>	<p>This objective asks the applicant to recognise and provide for the historic and contemporary relationship with Te Manahuna and for the applicant to explain how the proposed activity will/will not disrupt this. Mana whenua sees the land and waters and its indigenous species as one being. You may want to research the term “ki uta ki tai” and explain how a solar farm, its ancillary infrastructure and security fencing will/will not impact the landscape and biophysical characteristics of the immediate and wider environment.</p> <p>Through the substantive application process, mana whenua have sought to ensure that their role and relationship with Manahuna are appropriately recognised and provided for, including through the development of mana whenua specific conditions (e.g, Kaitiaki Governance Group and development of a work programme).</p> <p>While early and meaningful engagement is generally encouraged (particularly during the project design phase) it is acknowledged that a breakdown in the relationship between the applicant and mana whenua limited those opportunities.</p>
<p>Strategic Objective MW-02:  <i>Mana whenua are able to:</i></p> <ol style="list-style-type: none"> <li><i>1. be actively involved in decision making that affects their values and interests;</i></li> <li><i>2. exercise their kaitiakitaka responsibilities; and</i></li> </ol>	<p>No assessment provided by the applicant in relation to this objective</p>	<p>This objective requires that mana whenua are actively involved in decision-making processes affecting their values and interests, and that their ability to exercise kaitiakitaka and undertake customary activities in accordance with tikanga is maintained.</p>

<p>3. <i>carry out customary activities in accordance with tikanga.</i></p>		<p>The application does not clearly demonstrate how access to, and use of, culturally significant areas—particularly traditional food gathering areas associated with rivers and lakes—will be maintained. 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 the proposal clearly addresses whether physical access routes and cultural practices will be maintained or constrained by the development.</p> <p>As noted in relation to Objective MW-01, mana whenua have 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.</p>
<p>Objective SASM-O1: <i>Rakatirataka is recognised by supporting mana whenua to exercise kaitiakitaka over SASM.</i></p>	<p>The Point Solar Farm has been developed in a manner that recognises the presence and importance of mana whenua through engagement with mana whenua. The Applicant has engaged with mana whenua since lodging the substantive application and provided opportunities for input into site design and management, including proposed consent conditions.</p>	<p>This assessment is not supported by the engagement history and requires some acknowledgement of the breakdown in engagement (as highlighted at MW-O1).</p> <p>FNSF and Williamson Water and Land Advisory did not consult mana whenua prior to lodging the substantive application with the EPA. By the time the substantive application had been lodged the design had been confirmed. If mana whenua were genuinely engaged in site design, access to mahika kai and nohoaka sites would be 'practicable'. The</p>

		<p>ability to modify the site design to provide access now appears limited or non-existent.</p> <p>Mana whenua was also not consulted during the development and drafting of the various management plans and site specific conditions of consent. There appears to be the understanding that mana whenua is only interested in or concerned with the kaitiaki governance group and cultural monitoring programme conditions, which is not the case.</p> <p>For mana whenua to effectively exercise kaitiakitaka, there is a need for meaningful input into management plans/measures that relate to the protection of taonga species, the landscape values and mahika kai. While the proposed governance group may provide a pathway for ongoing involvement, it does not address the limitations arising from the absence of early-stage engagement in the application process.</p>
<p>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></p>	<p>The proposal does not directly affect any mapped SASM sites or known wāhi tapu sites. Any potential effects are appropriately managed through engagement and construction management measures, including the Accidental Discovery Protocol and strategic cultural programme (work programme) proposed.</p>	<p>This assessment is overly narrow and does not fully address the intent of the objective.</p> <p>This objective wants the applicant to understand the values of the SASM features and the relationship mana whenua have with their takiwā. Whilst the Accidental Discovery Protocol Condition is appropriate given the volume of earthworks and FNSF are willing to accept the work programme condition, the interests of mana whenua extend beyond these aspects. Therefore, a general statement such as this is not a true assessment.</p> <p>While the site itself is not located within a mapped SASM, it adjoins Lake Benmore, Twizel River and</p>

		Pūkaki River which are identified as a SASM. In addition to this, Lake Benmore is recognised as a Statutory Acknowledgement Area under the Ngāi Tahu Settlement Act 1998. As such, consideration should be given to potential indirect effects on the values of the adjoining SASM and the relationship of mana whenua with this area.
Objective SASM-O3: <i>Inappropriate subdivision, use and development within SASM is avoided.</i>	The proposal is not located within a mapped SASM overlay and does not involve modification of any identified scheduled site.	While the proposal is not located within a SASM, given the proximity of the site to Twizel River, Pūkaki River and Lake Benmore, and the recognised importance of the surrounding landscape to mana whenua, it is appropriate that potential effects on these values are carefully considered.
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>	The Applicant would be willing to work with mana whenua to identify mahika kai and nohoaka areas on the site and provide access, if practicable.	<p>The assessment incorrectly spells Nohoaka (see correction).</p> <p>FNSF engaged Wildlands to establish a planting plan. FNSF and Wildlands did not consult with mana whenua to ascertain whether the plants chosen have mahika kai value. Not all indigenous plants are considered mahika kai.</p> <p>If mana whenua were genuinely engaged, access to mahika kai and nohoaka sites would have been made 'practicable'. Given the site will be secured with permanent security fencing, how will mana whenua have access to mahika kai? How will mana whenua be able to interact with the land, waterways and lakes in a meaningful way? These matters need to be clearly explained rather than rewording the objective.</p> <p>The assessment does not demonstrate how the objective will be achieved in practice. Potentially</p>

		<p>as a way forward, it could be useful in the assessment to acknowledge that there is a reliance on the mana whenua specific conditions to achieve (as far as practicable) the outcomes sought in this objective, while also acknowledging that there has been limited/no input from mana whenua into the preparation of the application.</p>
<p>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></p>	<p>Engagement with mana whenua is ongoing and will continue throughout the lifespan of the project.</p>	<p>This assessment appears to be a statement of intent rather than an evaluation of how the policy has been met.</p> <p>Furthermore, the proposed consent conditions provide ongoing opportunities for engagement with mana whenua, including the Cultural Monitoring Programme.” This should be updated to include reference to the Strategic Cultural Programme (work programme) and explain how FNSF will work with mana whenua to ensure taonga species are not impacted by the solar farm.</p>
<p>Policy SASM-P3: <i>Enable mana whenua to undertake mahika kai within SASM in accordance with tikaka.</i></p>	<p>The Applicant would be willing to work with mana whenua to assist with providing access to mahika kai sites, where practicable.</p>	<p>As above, this assessment is a statement of intent and does not demonstrate how the policy will be achieved in practice.</p> <p>How will the applicant work with mana whenua to assist with providing access to mahika kai sites? If the site is fenced off and access has to be gained across another farm, will FNSF work with the other landowner to ensure mana whenua have access.</p> <p>As currently presented, the assessment relies on a general willingness to engage in future discussion, rather than demonstrating how mahika kai access could be enabled in a practicable and culturally appropriate manner (within the constraints of the site).</p>

<p>Policy SASM-P4:  <i>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.</i></p>	<p>The Applicant would be willing to work with mana whenua to assist with providing new access to SASM, where practicable.</p>	<p>Same as above.</p>
<p>Policy SASM-P5:  <i>Encourage restoration and enhancement of indigenous vegetation that supports mahika kai.</i></p>	<p>The Applicant would be willing to work with mana whenua to identify opportunities for restoring and enhancing areas of indigenous vegetation that supports mahika kai.</p> <p>It is also noted that extensive on-site planting is proposed by the Applicant, which will improve indigenous vegetation values on site.</p>	<p>How will FNSF work with mana whenua to identify opportunities to restore and enhance indigenous vegetation? How will rūnaka have access to the site to harvest mahika kai? If mana whenua were genuinely engaged, access to mahika kai would have been made incorporated into the design of the site and made ‘practicable’.</p> <p>FNSF and Wildlands have not approached AECL or Aukaha to gain an understanding of what indigenous plants need to be planted in order for mahika kai to be gathered as not all indigenous vegetation is considered mahika kai. The planting list has not been provided to Arowhenua and Aukaha to pass on to Arowhenua nursery for review.</p> <p>Overall, the assessment relies on a general commitment to future engagement rather than demonstrating how restoration outcomes supporting mahika kai could be incorporated into the proposal.</p>