



Appendix Q - Mana Whenua Consultation

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1. The Point Solar Farm - Iwi Engagement Summary

Engagement with Iwi and Rūnanga groups took place over a 10-month period from February to November 2023. This engagement included a total of 64 individual interactions with Mana Whenua groups and their agencies and consisted of emails, phone calls, online hui and site visits. An itemised log of all engagement activity and the Iwi, Rūnanga and Mana Whenua groups involved can be found below (see *Section 2*).

Following a hui with Ngāi Tahu Group Head, Strategy & Environment in May 2023, the Applicant was directed to undertake all further engagement with the local Rūnanga and was introduced to each party by Ngāi Tahu. In-person and online engagement then took place with Te Rūnanga o Arowhenua and Te Rūnanga o Waihao who instructed the Applicant to formally engage via respective consultancies who represented their interests. Te Rūnanga o Moeraki did not respond to requests for engagement.

Separate Consultant Agreements were accordingly signed between the Applicant and Aoraki Environmental Consultancy Limited (AECL) on behalf of Te Rūnanga o Arowhenua on 1 June 2023 and between the Applicant and consultancy Aukaha, acting on behalf of Te Rūnanga o Waihao, on 13 June 2023. All site plans, technical reports and the draft Assessment of Environmental Effects (for resource consent applications subsequently lodged under the RMA) were provided. The scope of works for both consultancies included:

- (a) Liaising with each of the Rūnanga whose takiwā includes the application site. The application would be summarised (including an assessment of cultural values) and sent to representatives at the Rūnanga who have the mandate to reply. Once a reply from all Rūnanga was been received, a letter would be sent with their response.
- (b) Frequent engagement between the Applicant, Aukaha and AECL, including at times delegates from Waihao and Arowhenua, took place over the next three months. These included email, phone, online hui as well as a visit to the application site.

In a letter dated 12 September 2023, and with an accompanying memo, AECL communicated that they and Te Rūnanga o Arowhenua were unable to support the Applicant's proposal (*see Section 3*). In a letter dated 14 September 2023, Te



Rūnanga o Waihao wrote to advise that they fully supported the position and reasoning reached by Te Rūnanga o Arowhenua (*see Section 4*).

The Applicant wrote to both Rūnanga to thank them for their consideration and introduced Mr Dee Isaacs (Te Aupōuri, Ngāti Tūwharetoa and Te Ātihaunui a Pāpārangi Taumarunui), an experienced RMA planner and Māori engagement and local government consultant. Mr Isaacs holds a graduate diploma in te reo Māori translation and interpretation, as well as bachelor and master degrees in law.

Under the guidance of Mr Isaacs, the Applicant requested a hui to discuss the respective Rūnanga decisions and concerns with the proposal. At this subsequent hui on 7 November 2023, representatives from AECL and Aukaha emphatically stated they did not wish to have any further kōrero with the Applicant or discuss any matters relating to the proposal (*see Section 6*).

Following the commencement of the Fast-track Approvals Act (FTA), the Applicant withdrew the resource consent applications lodged under the RMA which had been the subject of consultation with Iwi. The subject matter of those applications is now contained in the Applicant's Substantive Application under the FTA.

A full description of how engagement and consultation with the Rūnanga informed the Applicant's proposal previously captured in the resource consent applications under the RMA and now incorporated in the Substantive Application under the FTA is provided in DPI Consulting Ltd's Assessment of Kā Rūnaka (Arowhenua, Waihao and Moeraki) consultation about The Point solar farm and how this has informed the project through design and mitigation (*see Section 5*).

2. Iwi Engagement Log

Date	How	Involved stakeholders	Project Reps	Summary	Follow-up actions (if any)
28-Feb-23	email	Jacquie Caine - Group Head, Strategy & Environment, Ngai Tahu	GH	Wrote to introduce myself on behalf of Far North Solar Farm with the hope of initiating a korero about plans to construct a solar farm within the rohe of Ngāi Tahu at Ohau. Asked if we could meet face to face to discuss the proposal more.	
6-Mar-23	email	Kelly Chapman - Senior Policy Advisor, Ngai Tahu	GH	Said they appreciated our email and the approach to talk to Ngāi Tahu as mana whenua. Asked if we were developing anywhere else as they were currently considering whether we would be best to meet with Jacqui (and/or others from Te Rūnanga) or whether it is best to connect you with the Papatipu Rūnanga who are mana whenua at the Ōhau site. I replied and told her about Kikiwa and Waipara. Kelly replied on 9-Mar-23 saying they will be in touch when they have worked out the best people for us to meet with	
28-Mar-23	email	Kelly Chapman - Senior Policy Advisor, Ngai Tahu	GH	emailed Kelly to advise I was heading away for April and could we met in early May. Kelly replied to say she had forwarded my email to Jacquie Caine's PA. Fiona Dickson, acting EA to Group Head Strategy & Environment, wrote to propose two dates. I replied that Friday 19 May 11am at Ngai Tahu HQ in Christchurch.	
19-May-23	meeting	Jacquie Caine - Group Head, Strategy & Environment, Ngai Tahu	GH, Richard Homewood, John Andrews	Friendly meeting that lasted one hour. We gave Jacquie a flyer with details about the planned solar developments within the south island. Talked about the needs for more renewable generation and why locations are selected. Asked for guidance on how best we should proceed with engagement with mana whenua. Jacquie said she would connect us with the right people as the engagement would need to happen at a runanaga level specific to each development.	GH to stay in touch and pick up the introductions
19-May-23	email	Jacquie Caine - Group Head, Strategy & Environment, Ngai Tahu	GH	Jacquie wrote to say thanks for meeting. Gave links to the Ngai Tahu Climate Change Strategy and Climate Action Plan. Also gave details about an energy wananga being held in Invercargill which she had spoken to us about and that some people from respective runanga for Ohau might be at the event so a chance to meet.	
22-May-23	email	Jacquie Caine - Group Head, Strategy & Environment, Ngai Tahu	GH	Jacquie wrote to confirm that mana whenua for the 3 solar farms in the Ngāi Tahu takiwā are: The Point and Ohau Solar - Arowhenua, Moeraki, Waihao Waipara - Ngāi Tūāhuriri Rūnanga She also said Jo McLean who is the Representative for Waihao, and Trudy Heath, the Executive Director for Waihao, will be at the Energy Expo and she would be happy to facilitate an introduction. I replied same day and said we would travel to Invercargill and take her up on the offer.	
22-May-23	email	Jacquie Caine - Group Head, Strategy & Environment, Ngai Tahu	GH	Jacquie wrote to connect us with the runanga delegates for the developments we had discussed we were pursuing in the south island. She cc'd Arowhenua, Moeraki, Waihao representatives Fiona Pimm, Justin Tipa and Jo McLean. She also included Ngāi Tūāhuriri Rūnanga representative Tania Wati for the Waipara solar farm. She explained to the delegates that she had met with FNSF and we had briefed her on the proposals we had and that we wanted to engage with mana whenua. She also attached the flyer we had given her with information about the developments.	pick up the introductions with the representatives
23-May-23	Murihiku Energy Wananga - Invercargil	Jody McLean & Trudy Heath (Waihao) Justin Tipa (Moeraki)	GH	Attended the wananga and Jacquie pointed out Trudy, Jo and Justin. I took opportunities throughout the day to introduce myself to them and talk briefly about FNSF and our plans in south island. Asked the delegates how they wished to proceed with engagement, if at all, and they said we could engage with them. They advised they use environmental agencies to process RC applications and to go through them on the issue. I passed them hard copies of the flier we had given Ngai Tahu already on the south island developments and who FNSF was. We all agreed to keep in touch via email and progress the relationship.	GH to contact via email and progress relationship
26-May-23	email	Fiona Pimm (Arowhenua), Jo McLean (Waihao) Justin Tipa (Moeraki)	GH, RH, JT, AE	Picking up Jacquie's email introduction, and following on from the brief korero I have had with both Justin and Jo at the wananga in Invercargil. Advised it was likely we would submit RC application for The Point by end of June. Providing link to AEE and asked if they could connect us with their environmental agencies so we could proceed with engagement. Said we were hoping to establish a friendly relationship based on mutual respect and trust.	
29-May-23	email	Fiona Pimm (Arowhenua) Ally Crane (AEC Ltd)	GH	Fiona wrote to say Te Runanga o Arowhenua has a subsidiary, Aoraki Environmental Consultants and they manage all matters related to consents on their behalf. Introduced Ally Crane. Ally wrote after we spoke briefly by phone. She sent through a scope of work and advised that once signed, dated and returned, they will commence reviewing the documentation in the link provided. I replied and said we'd get on to it right away.	provide Ally with everything she needs to commence
31-May-23	email	Ally Crane	GH	asked for an estimate around the level of resourcing required to provide a formal written report of the Rūnanga response to the proposal for budgeting purposes. All replied 1 June stating a range between \$5,000.00 and \$7,000.00 plus GST plus travel time and mileage.	
1-Jun-23	email	Ally Crane	GH	Sent Ally the signed scope of work doc AEC had provided. She replied with thanks. Asked when would we want to look at an online hui and a site visit. I replied we would work in with their requirements. Advised I have not had any contact from Moeraki or Waihao and suggested that giving them a heads up as to when we might be doing a site visit could be a good way to re-engage. Asked if Ally could give me a week's notice for any meeting so we can sort logistics.	
6-Jun-23	email	Jo McLean, Trudy Heath, Dardanelle McLean-Smith	GH, JT, RH, AE	Wrote to Jo to follow up on my previous email regarding our wish to engage with Te Rūnanga o Waihao as mana whenua in Ohau over plans to develop a utility-scale solar farm near the northern shores of lake Benmore in the Mackenzie basin. Said we had supplied AEC with info on behalf of Arowhenua and would likely submit a RC application soon. AEC have indicated a site visit is desired, asked did Waihao desire this also? Asked if they would be interested in preparing a cultural impact assessment. Jo replied same day to say yes to site visit. she cc'd Waihao EO-Trudy Heath and Chair, Dardanelle McLean-Smith and advised we were best to liaise with them from here.	
6-Jun-23	email	Jo McLean, Trudy Heath, Dardanelle McLean-Smith	GH, JT, RH, AE	Trudy wrote to ask us to send through any relevant information to Aukaha Ltd on their behalf and to let her know the possible dates for a site visit and they will try to make themselves available.	Go back to Trudy with info and dates
12-Jun-23	phone call & email	Aukaha reception	GH	Spoke with Maria Ellison this mornign and followed with an email enquiring about how best to go about engaging with them on behalf of Waihao as we'd been advised to do. Provided links to documents supporting the application. Advised I had also tried to engage with Justin Tipa from Moeraki on the project and understood Aukaha acted for them also. Asked Aukaha to advise how we can assist in the RC application process.	
12-Jun-23	email	Mereana Goodman Kaimahi Whakaaetaka Taiao - Consents Officer Mana Taiao - Aukaha	GH	A reply to my email sent to Maria Ellison. Mareana advised how new consents are processed and provided link to form to fill out.	
12-Jul-23	email	Jo McLean, Trudy Heath, Dardanelle McLean-Smith	GH, JT, RH, AE	replied to Trudy saying I had forwarded all documents to Aukaha as requested. Said I would advise on dates for a site tour. Thanked them for engaging with us and said we were looking forward to working with their team.	
12-Jun-23	email	Ally Crane	GH	I sent a dropbox link to the final RC application for the solar farm. Advised I have also sent docs to Aukaha on behalf of Waihao who have come back to me. Asked her to suggest a date for a site visit. Ally replied and asked if any day of the week suited us for a site visit.	keep in touch r.e site visit date
13-Jun-23	email	Mereana Goodman Kaimahi Whakaaetaka Taiao - Consents Officer Mana Taiao - Aukaha and Makareta Wesley-Evans Kaimahi Whakaaetaka Taiao (Consents Officer) Mana Taiao	GH	I wrote to Mareana to say I was filling out the online application but the maximum file size for uploading supporting documents is 10MB. The document we have are considerably larger than this, hence the file sharing links sent yesterday. Asked her to advise how best to proceed? Makareta replied same day saying send the files to her at the consents@aukaha.co.nz address, which I did.	
13-Jun-23	email	Aukaha Applications applications@aukaha.nz	GH	Notification Aukaha Consent Application Received	
14-Jun-23	email	Ally Crane	GH	GH suggested a site visit on 4 July. Advised we were also talking to Waihao and that it made sense to do the visit together. Asked if they were ok with that. Ally replied and said she'd get back to me on the date. She said she didn't think they will have any opposition to a joint site visit but asked for a list of attendees so that everyone is aware who is who and where they are from. Ally said they had been advised that the application has been filed with the Mackenzie District Council. Can we email through the final resource consent application to the writer so that her team can read through. <i>NB: this had been provided via dropbox on 12th but I sent again</i>	keep trying to confirm all attendees at site visit
19-Jun-23	email	Aukaha Consents	GH	Wrote to Aukaha to ask if a representative from either Aukaha or Te Rūnanga o Waihao, or both, would be available for a site visit of the solar farm proposal currently under review in Ohau on Tuesday 4 July. Asked them to let me know if this date was ok. Makareta Wesley-Evans replied same day to say she would 'send this out to Te Rūnanga o Waihao and will bring this up with our consents team'	<i>NB: on email thread it shows my email was forwarded to Pam Walker</i>

19-Jun-23	email	Ally Crane	GH	wrote to Aukaha if a representative from either Aukaha or Te Rūnanga o Waihao, or both, would be available for a site visit of the solar farm proposal currently under review in Ohau on Tuesday 4 July. Asked Ally to let me know if date was ok	
19-Jun-23	email	Ally Crane	GH	Ally wrote to say the 4th July was fine for a site visit. She wrote again on the 23rd asking if there was any update on other attendees.	GH to try confirm other attendees.
26-Jun-23	email	Aukaha Consents	GH	followed up around earlier email offering site tour on 4 July. Asked if they could confirm if a representative of Aukaha is able to attend on behalf of Te Rūnanga te Waihao? Aukaha replied on the same day to say they were unsure if they have any staff available to attend the site visit as consents team are currently under capacity. 'I will bring this up with our consents manager and she what her thoughts are.'	
30-Jun-23	email	Pam Walker - Aukaha	GH	Pam wrote to say they would not attend the site tour on 4 July. Said she would recirculate with runanga and get back to us. <i>NB: on email thread it shows my email request for the site tour was forwarded to Pam Walker on 19th June.</i>	
30-Jun-23	email	Ally Crane	GH	I wrote confirming we will meet Ally's team in Twizel at 1pm prior to carrying out the site visit for the solar farm. No other parties able to join us so it will be just us. asked for contact details for the people who will be coming from AEC so Could liaise with them directly on Monday as to the exact location to meet. Ally replied same day to say she had seen Trudy's email and that they would have to reschedule.	
30-Jun-23	email	Ally Crane	GH	I wrote to Ally to say I had seen and replied to Trudy's email. Said I am a bit surprised and disappointed as we have made a concerted effort to engage with Aukaha and was waiting to hear back from them before communicating to her but thought we were already agreed to attend on the 4th as per earlier emails. She replied same day to say no worries. She suggested an online hui might be a good idea before a site visit now. Said she'd be in touch	follow up on idea of online hui now
30-Jun-23	email	Ally Crane, Rynee de Garnham (Waihao), Trudy Heath - Waihao, Pam Walker (Aukaha)	GH,	Trudy wrote to say that because neither AEC Ltd nor Te Rūnanga o Waihao had received any detailed information with regards the site visit nor any Health and Safety plans for the visit at this late stage they can only assume it is not going ahead. When looking to set an alternative date please consider that we require both AEC Ltd and Aukaha representatives to be in attendance as well as our Rūnanga Representatives. <i>NB: AEC had already confirmed on 19 June. Waihao had been supplied requests as above but never replied.</i>	
30-Jun-23	email	Ally Crane, Rynee de Garnham (Waihao), Trudy Heath - Waihao, Pam Walker (Aukaha)	GH	Ally referred to previous email correspondence asking for confirmation on the site visit (<i>she had confirmed AEC visit, we were waiting for confirmation on other attendees</i>), and noted Trudy's email. She pulled out of the visit and said she would like some alternative dates to reschedule so that both Aukaha and AEC Limited can attend together.	work with everyone to find new dates
30-Jun-23	email	Ally Crane, Rynee de Garnham (Waihao), Trudy Heath - Waihao, Pam Walker (Aukaha)	GH, JT, RH	I wrote to Trudy apologising if she felt she had been waiting for further information as I thought we had been very clear in communicating the intention to orchestrate a site visit. I provided evidence of my attempts to communicate with Aukaha on the matter and had been assured by responses that it was being communicated with the appropriate people. Said FNSF were available to meet at their earliest convenience and could all parties suggest a date that suited them to do this.	keep trying to work on getting anew date for site tour that suits everyone
3-Jul-23	email	Ally Crane, Rynee de Garnham (Waihao), Trudy Heath - Waihao, Pam Walker (Aukaha)	GH, RH, JA	GH wrote to propose the following date options for a site tour of the proposed solar farm site at Te Manahuna. 19 or 20 July or 24 or 25 July. Also said I would prepare a H&S plan. Said we were open to an online hui prior to visit too. Could they please let us know what they would like to do.	prepare H&S info and supply
3-Jul-23	email	Ally Crane, Rynee de Garnham (Waihao), Trudy Heath - Waihao, Pam Walker (Aukaha)	GH, RH, JA	Ally wrote to say The date of 19th July 2023 would work – commencing at 10:30am, and finishing no later than 12.30 pm. Said it was prudent to do an online hui prior. Suggested 11th or 13th.	GH to see if dates work for team to confirm online hui
4-Jul-23	email	Ally Crane, Rynee de Garnham (Waihao), Trudy Heath - Waihao, Pam Walker (Aukaha)	GH, RH, JA	GH wrote to confirm time for site tour was good for FNSF. Suggested Thursday 13 July at 10.00am as a time for hui. Asked for other on email to pls confirm. Trudy Heath wrote same day to confirm was ok with her. So too did Ally who asked if I could send invites.	send invites to all for online hui
5-Jul-23		Ally Crane, Rynee de Garnham (Waihao), Trudy Heath - Waihao, Pam Walker (Aukaha), melishangten	GH, RH, JA	Sent runsheet, risk assessment form and FNSF H&S manual. Asked for all parties to confirm attendees so we could fianlise vehicle hires.	
10-Jul-23	email	Ally Crane, Rynee de Garnham (Waihao), Trudy Heath - Waihao, Pam Walker (Aukaha), melishangten	GH, RH, JA	Trudy wrote to say she would not attend site visit but Rynee would attend on behalf of Waihao. Trudy would attend the online hui.	
13-Jul-23	online hui	Ally Crane, Kate Timms-Dean, Pam Walker, Rynee de Garnham, Trudy Heath, Michael McMillan	Greg Hay, John Andrews, Richard Homewood, Dr Morgan Tracy (ecologist), Laila Alkamil (AEE Planner), Paul Smith (Landscape Architect)	FNSF thanked all for attending. Ran through proposal in detail including the EEP, landscape effects, infrastructure constraints which would mean only a small number of solar farms would be able to exist in the area, reason for site selection - degraded farm land and proximity to infrastructure. Updated on intent to file RC shortl	On site visit arranged for following week. Will be important to make face to face connections and talk about any issues and how we can potentially work together.
18-Jul-23	email	Pam Walker, Kate Timms-Dean (Aukaha)	GH and JA	Pam wrote re - confirming that Kate Timms – Dean, General Manager: Mana Taiao, will be attending the site visit tomorrow. Kate has a 4 – wheel drive, and no doubt you can sort out details when you meet at Musterers Hut Cafe car park - 20 Ruataniwha Road, Twizel at 10:30am tomorrow.	
18-Jul-23	phone	Ally Crane	GH	I rang Ally to seek confirmation AEC were attending the site vsiit and if we could have contact details of numbers and delegates for planning. Ally replied in an email confirming Michael McMillan and Sally Reihana would attend for AEC. Advised Rynee de garnham would also attend with them on behalf of Waihao.	
20-Jul-23	site visit	Aukaha (Waihao consultancy) Kate Timms – Dean, General Manager environment AEC Ltd (Arowhenua consultancy) Michael McMillan and Sally Reihana Rynee de Garnham - Waihao	Greg Hay & John Andrews	Took them onto site after H&S briefing. FNSF provided two vehicles and drove. Showed the effects of dairy on the land. talked about the ecological mitigation, how the farm would connect to grid. Listened to iwi about their historical link to the land. Went and had lunch together and everyone seemed on very friendly terms by the end of the outing. A good result and shows the value of face to face interaction. They told us they have been approached by multiple solar farm companies with plans for the area. There is concern that too many solar farms might come in and take over the land.	Both Runaka groups are preparing a report on the development which is required for RC. No indication what their position is.
3-Aug-23	email	Aukaha Accounts	GH	Wrote email in response to getting invoice from Aukaha stating they have completed a report and draft summary. Asked if they could give an indication of when we might expect a decision about the proposal.	
7-Aug-23	email	Ally Crane	GH	Wrote to ask if there was an update on how work is progressing and when we might expect to see a conclusion to that and an official position from the Rūnaka. Ally replied same day to advise that further time and discussions are required with each Runanga, including Aukaha. She would get back to me in 'due course'.	
7-Aug-23	email	Pam Walker - Aukaha	GH	Asked Pam if there was any update on the request to engage with Moeraki	keep trying to seek ways to engage with Moeraki through Pam
11-Aug-23	email	Ally Crane & Pam Walker	GH	Emailled to attach the stormwater resource consent application for ECan, and the supporting stormwater assessment as has been required by MDC in support to the resource consent application. Ally replied same day to acknowledge.	
15-Aug-23	email	Ally Crane, Kate Timms-Dean, Pam Walker, Rynee de Garnham, Trudy Heath	RH, JT, AE	Wrote to let to let runanga and agencies know about an additional solar development we have decided to explore in Te Manahuna. Explained we hadn't discussed this earlier as the development is still at a very early stage and we haven't yet confirmed the site coverage or developed any conceptual engineering or layout plans which we could share. However, we wanted to raise it as early as possible to give them a chance to be involved. Asked for their input to make sure there was adequate benefit to mana whenua. Pam Walker replied to acknowledge and loop in Charlotte Boyt from Moeraki, as well as Tim Vile from Aukaha who was working on the consent application.	

18-Aug-23	email	Pam Walker - Aukaha	GH	Pam explained Charlotte Boyt is the consent representative for Moeraki, and is the People and Environment Manager at Te Rūnanga o Moeraki. Said Charlotte was going to liaise with whanau about an on-site visit and then come back to her with response.	followup in a week if heard nothing back
23-Aug-23	email	Aukaha consents	GH	Aukaha wrote to advise the draft summary of the application is currently in progress and should be getting sent out to rūnaka shortly. Unable to provide a timeframe of how long till they made a decision.	
30-Aug-23	email	Pam Walker - Aukaha	GH	Charlotte Boyt has advised that she is keen to visit the site and that there may be other whānau members as well (potentially 1 – 2 extra people). Pam might also join. Advise dates for consideration.	liaise interanlly to find dates that work for a visit.
4 Sept	email	Pam Walker - Aukaha	GH	GH advised Pam the 14th and 15th would work for a site visit with Charlotte or 20th or 21st is also an option. Pam replied next day and said she'd get back to me.	
12-Sept-23	email	Trudy Heath, Ally Crane, Pam Walker, Kate Timms-Dean, Rynnee de Garnham, Charlotte Boyt, Sally Herewini	GH, RH	I wrote to raise the topic of ecology and the plans we have associated with the proposed solar farm The Point to plant native plants of various species. Asked if there was any interest amongst mana whenua to collaborate with us in this regard either in supply of the required plants or in their establishment... or both. Suggested it could be a good way to work together. Attached a pdf with more info on the EEP. Ally Crane responded to say they would have the formal response of AEC and Arowhenua shortly.	
12-Sept-23	email	Ally Crane	Greg Hay	Formal communication stating Arowhenua cannot support the project. Refer to letter in FNSF project folder.	will ask for opportunity to re-engage as we think they have missed much information and we want to put forward more evidence of direct
14-Sept-23	email	Pam Walker	GH	Formal communication stating Waihao cannot support the project and agree with Arowhenua letter. Refer to letter in FNSF project folder.	
18-Sept-23	email	Pam Walker	GH	Pam wrote to acknowledge the 14th and 15th as proposed dates for a site tour with Charlotte Boyt had passed. Said they were all very busy but would send a reminder and get back to me.	
19-Sept-23	email	Pam Walker - Aukaha	GH	Pam wrote to advise Charlotte Boyt has been in touch and is available early next week. She is away on leave from next Thursday 28 Sept – 11 October, so early next week would be best. We replied and said we could do Tuesday 26th (we had an event to set up for that week). Pam emailed back saying Charlotte could now NOT do Tuesday but could do wednesday. We replied we could not as that was the day before the Waipara Open day and we needed to set up.	no response
20-Sept-23	email	Pam Walker	GH	Emailled Pam asking if Charlotte would consider Monday 16th October for the site visit instead.	no response
21 Sept 23	email	Pam Walker, Ally Crane	GH, RH, Dee Isaacs	Thanked them for their consideration of the application and acknowledged their connection with the area. Introduced Dee as a cultural consultant. GH noted the Assessment of Application response noted several areas of concern to Rūnanga, particularly around the perceived lack of benefit to mana whenua from the proposal. Said we felt we had perhaps not done enough mahi to articulate adequate responses to these and other questions to allay uncertainty. Asked for an opportunity to meet face to face to talk about the decision and address concerns.	
26-Sept-23	email	Pam Walker, Charlotte Boyt	GH, RH, Dee Isaacs	GH wrote to ask if our proposed date of 16 October will be suitable for Charlotte for a site visit at The Point solar farm site. I know you are heading away on Thursday so would be great if we could get a date firmed in our calenders prior to that if possible?	no response
5-Oct-23	email	Ally Crane, Pam Walker	GH, RH, Dee Isaacs	Ally replied to my 21 Sept email asking for a chance to meet to discuss formal decision and issues around that. Said she would get back to me once discussions between Arowhenua and Waihao were held.	
11-Oct-23	email	Aukaha (Waihao consultancy) Pam Walker AEC Ltd (Arowhenua consultancy) Ally Crane	Greg Hay	Introduced Dee Isaacs. Asked for an opportunity to meet with AEC and Aukaha prior to any engagement with Rūnanga. Proposed dates 23rd till 27th October	no response
25-Oct-23	email	Jacquie Caine - Group Head, Strategy & Environment, Ngai Tahu	GH, RH	GH advised FNSF have had online hui, a site visit and ongoing korero via email and phone with runanga. At this stage, Arowhenua and Waihao have directed that they cannot support the proposal. We are still trying to engage with Moeraki. Explained we had reached out and were hopeful of re-engaging and explaining benefits better and discussing concerns.	no response
25-Oct-23	email	Trudy Heath & Jo McLean (Waihao delegates) + Fiona Pimm (Arowhenua) - cc Pam Walker and Ally Crane	Greg Hay	GH wrote to runanga asking for opportunity to meet face to face to discuss project and work to reshape it to meet runanga aspirations. Said we hadn't been clear enough on the benefits to iwi. Asked for opportunity to discuss matters of concern as expressed in formal response on 12 Sept.	awaiting response as at 27/10/23
1-Nov-23	email	Pam Walker	GH, RH, Dee Isaacs	Enquired again about Moeraki and Charlotte Boyt site visit. Also expressed our desire to wish to re-engage with Waihao to discuss specific concerns as expressed in the formal letter	no response
3-Nov-23	email	Ally Crane, Pam Walker	GH, RH, Dee Isaacs	Ally replied to my 11 Oct email asking for an opportunity to meet with AEC and Aukaha prior to any meeting with runanga. Requested a meeting for 7 November.	
7-Nov-23	online hui	Ally Crane, Pam Walker, Kylie Hall, Tim Vile, John Henry	GH, RH, Dee Isaacs	See memo of meeting. All three runanga do not wish for any further engagement with FNSF.	

3. Te Rūnanga o Arowhenua - Official Response



12 September 2023

Mr Greg Hay
Communication and Engagement Lead
Far North Solar Farm Limited
Level 1 Office
65 Main Road
Kumeu
AUCKLAND 0810
[delivered to: [REDACTED]]

Tēnā koe Greg,

LAND USE CONSENT TO ESTABLISH 420 MEGAWATT-PEAK SOLAR FARM AT SECTION 3 SO 384036

Aoraki Environmental Consultancy (AEC) on behalf of Te Rūnanga o Arowhenua (Arowhenua) would like to thank you for the opportunity to meet with Far North Solar Farm Ltd staff whilst undertaking a site visit to the application site to view the proposal area. AEC would also like to thank you for the opportunity to review and comment on the proposed resource consent application on behalf of the three rūnaka.

Arowhenua rūnaka have strong connections with Te Manahuna (the Mackenzie District). The report attached outlines how the landscape is woven with memories and traditions, including mahika kai sites, taonga species, and sites of archaeological importance including pā, urupā and rock art. The report also outlines why iwi, hapū and whanau have an immense sense of belonging and connection to the whenua and a desire to enhance their connection to Te Manahuna.

Given the significance of Te Manahuna and the visual and physical impact the proposed solar farm will have on the cultural landscape and the ecological values found on site and on adjacent rivers, Arowhenua rūnaka cannot support the proposed solar array.

Please contact the writers if you have any questions.

Kā mihi,

A handwritten signature in blue ink, appearing to read 'Ally Crane'.

Ally Crane
General Manager
Aoraki Environmental Consultancy Limited
Mobile: [REDACTED] | Office: 03 684 8723



Te Runanga o Arowhenua Society Inc.



AORAKI
ENVIRONMENTAL
CONSULTANCY LTD

Te Rūnanga o Arowhenua Assessment of Application

Date: 12 September 2023

To: Mr Greg Hay
Communication and Engagement Lead,
Far North Solar Limited
Level 1 Office, 65 Main Road, Kumeu, Auckland 0810

From: Ms Ally Crane
General Manager
Aoraki Environmental Consultancy Limited
8A Washdyke Flat Road, Washdyke, Timaru 7940

CC: Mrs Fiona Pimm
Chair
Te Rūnanga o Arowhenua
39 Huirapa Street, Temuka 7920

Far North Solar Farm Limited resource consent application to establish a solar array consisting of 420 MWp photovoltaic panels on single axis trackers at Section 3 SO Plan 384036 owned by Douglas Robert McIntyre and Waitaki Trustees (Golden Acres) Limited.

Te Runanga o Arowhenua (Arowhenua) and Aoraki Environmental Consultancy Limited (AEC) would like to thank Far North Solar Farm Limited for the opportunity to meet on 13 July 2023 to discuss the proposed solar array development of Section 3 SO Plan 384036 within Te Manahuna / Mackenzie District. Arowhenua and AEC would also like to thank Far North Solar Farm Limited for the opportunity to visit the application site on 19 July 2023 to visually see the location and surrounding environment.

Arowhenua has considered this application as provided and is unable to support this application. The reasons are set out below.

The Proposal

Having reviewed the resource consent application documentation provided, Arowhenua and AEC understand Far North Solar Farm Limited propose to develop approximately 577 hectares of Section 3 SO Plan 384036 into a solar array consisting of 420 photovoltaic (PV) panels on single axis trackers. The panels will be set on 2.285 m wide tables that will rotate on a north-south axis 60 degrees. The height of the axis support posts is to be 1.5 m which will mean that the minimum distance from the ground for the PV modules will be 1.015 m. The free space between each module table is to be 3.997 m. The land under the solar panels is to remain grassed and will be tended by

sheep. The proposed arrangement will not have PV modules within a 40 m corridor for the transmission line that passes through the site. The access tracks will remain unpaved.

The extent of the site that will be utilised for the solar array is set out in Figure 1 below.

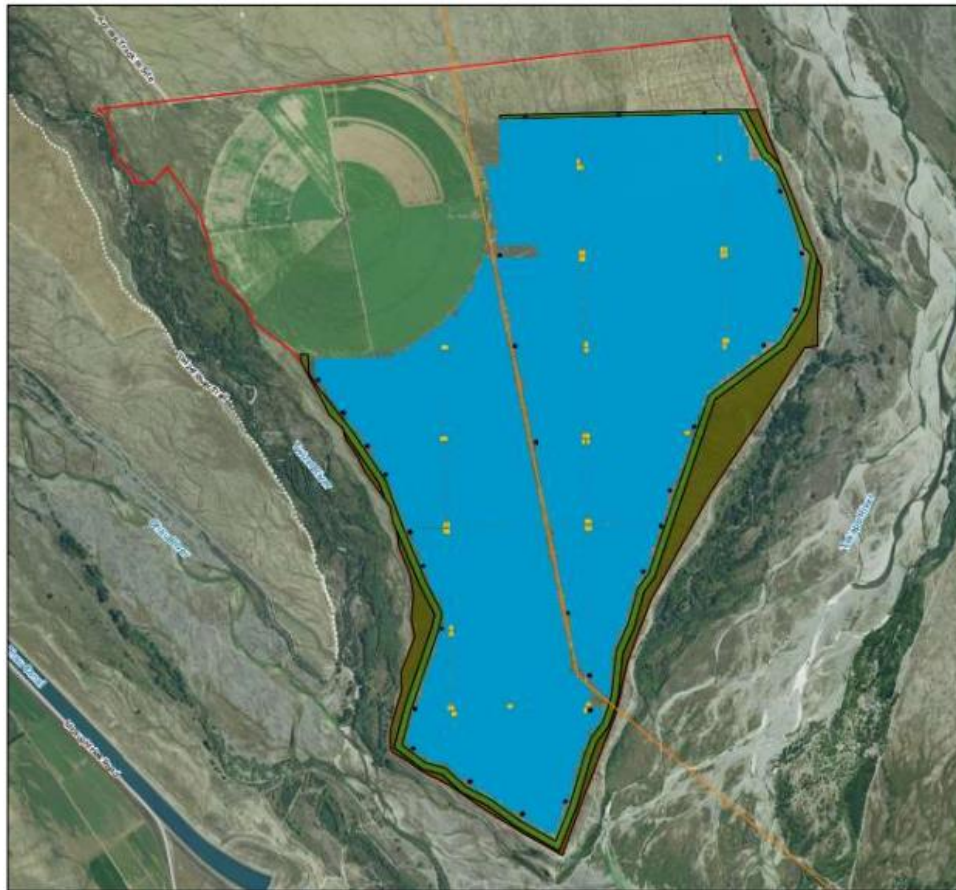


Figure 1: Image demonstrating extent of proposed development with PV modules (in blue). Taken from Stormwater Report (August 2023) prepared by Haigh Workman as part of the Stormwater Discharge resource consent application.

Arowhenua and AEC understand from Far North Solar Farm Limited that the purpose of the proposal is to directly support the uptake of low-carbon renewable electricity generation and assist the reduction of New Zealand's greenhouse gas emissions. In doing so, the proposal provides security and resilience to the electricity generation network, by reducing pressure and reliance on the National Grid and regional distribution network. The provision of renewable energy is seen by Far North Solar Farm Limited as an important positive effect, as it contributes directly to New Zealand's goal of net zero emissions by 2050 as set out in the Climate Change Response (Zero Carbon) Amendment Act 2019.

Significance of the Area to Manawhenua

Manawhenua named the area where the proposed solar farm sits Te Manahuna – the place of enlightenment – and the area is steeped in rich cultural and spiritual significance. All Ngāi Tahu whakapapa to their tūpuna, Aoraki, who is at the heart of the creation traditions of Te Waipounamu (the South Island) which sits at the heart of the Waitaki catchment.

The site itself sits at the confluence of the Whakatipu (Twizel) and the Pūkaki Rivers. The Pūkaki River is the parent water body providing source waters from Aoraki and his brothers to the downstream Waitaki River. The Pūkaki

River provided direct access between Lake Pūkaki and the Waitaki River, forming part of the extensive network of traditional travel routes that crossed Te Manahuna (the Mackenzie Basin) and the Upper Waitaki. Before Lake Benmore was created for a hydro-electricity project, the Pūkaki River connected with the Waitaki River, providing direct access between Lake Pūkaki and the Waitaki River. Several kāika mahika kai are located on the Pūkaki River, including Oma Pū, where tuna and a variety of birds, including weka, were gathered. Manawhenua use of the Pūkaki river has been lost due to the land use changes within the catchment.

While containing less recorded information the Whakatipu (Twizel) River for Arowhenua forms a part of the network of waterways that feed into and provide for mahinga kai and forms the flows into the Waitaki River. The Waitaki River being very significant to Kāi Tahu as the pathway of the waters from Aoraki to the sea. Kāi Tahu whānui always recognise and pay respects to Waitaki as a significant element of their being and identity.

With permanent settlements on the east coast, whānau from Te Rūnanga o Ngāi Tahu, Te Rūnanga o Arowhenua, Te Rūnanga o Moeraki and Te Rūnanga o Waihao would travel to Te Manahuna seasonally, to gather mahika kai, particularly tuna (eels) and weka. Mōkihi (river craft constructed from raupō or reeds) were used to carry resources along the Waitaki River back to the coast. Some tūpuna (ancestors) would journey further, along aro tawhito (ancient trails) in which rivers such as the Waitaki, Twizel, Pūkaki, and Hakataramea were used as a highway system to reach Hāwea and Wānaka, or Te Tai o Poutini (West Coast) in search of pounamu.

Today, Te Manahuna remains a place of significance. The landscape is woven with memories and traditions, including mahika kai sites, taonga species, and sites of archaeological importance including pā, urupā and māori rock art. Iwi, hapū and whanau have an immense sense of belonging and connection to the whenua and a desire to enhance their connection to Te Manahuna.

Recommendations and Conclusions for Development of the Site

Arowhenua and AEC broadly support the use of renewable energy, but this must not be at the expense of unique environments and the cultural landscape. Solar farms within the takiwā of Arowhenua are new and Arowhenua is faced with a number of applications for sites within Te Manahuna. Each application is considered on its own merit, but Arowhenua would ideally like to see a spatial plan developed showing where solar farms could occur and the extent of solar farms that could occur within the area. Arowhenua recognise that there is a global transition to renewable energy, and this is likely to accelerate in the coming years as countries and industries invest in clean energy solutions to mitigate climate change; however, the issue of appropriateness of the sites for these is a concern. The primary concern being the potential cumulative effect of solar farming with Te Manahuna. Without a strategic or spatial plan looking at where solar farms can be located, Arowhenua is concerned that the components that are wāhi tupuna within Te Manahuna are continuing to be compromised.

In relation to this specific site, the concern for Arowhenua is that it sits at the confluence of the Whakatipu (Twizel) and Pūkaki rivers, two waterways that are wai tupuna and flow into the Waitaki River. Arowhenua is concerned that the location of this solar farm will negatively impact the significant historical, spiritual and cultural values of the area. It is recognised that while the landscape in the area is changed from what it historically was a solar farm in this area provides a considerable visual intrusion.

It is recognised that the site is currently in farmland; however, Arowhenua is concerned that solar farms offer little opportunity to enhance or preserve the indigenous ecosystems unique to Te Manahuna. The mitigation proposed by Far North Solar Limited is limited to the establishment of planting around the periphery of the site. Farming will still continue under the solar panels.

While recognising that Far North Solar has indicated that solar farms such as this will provide employment opportunities, Arowhenua remain unconvinced of the overall economic opportunities solar farming brings to the

District and potentially to the Rūnanga. The construction of a solar array involves activity at the initial installation phase; however, once the array is established, very little ongoing works is required, other than general maintenance and cleaning. The energy generated by the solar array will be transported out of Te Manahuna via the existing national grid to be utilised by businesses and homes elsewhere in the country.

Given the visual and physical impact the solar array will have on the cultural landscape and the uncertainty that the benefits, despite being solar, outweigh the continued loss and alteration of the wāhi tupuna, Arowhenua and AEC are not in a position to support the proposed solar array development at Section 3 SO Plan 384036 within Te Manahuna / Mackenzie District.

4. Te Rūnanga o Waihao - Official Response



Te Rūnanga o Waihao



Ref: J005169, J005304

14 September 2023

Far North Solar Farm Limited
C/- Mr Greg Hay
Communication and Engagement Lead
Level 1 Office
65 Main Road
Kumeu
AUCKLAND 0810
(delivered to: Greg@fnsf.co.nz)

Tēna koe Greg

Re: Application for a Solar Array

Aukaha write this letter on behalf of Te Rūnanga o Waihao, one of the kaitiaki Rūnanga whose takiwā (area) includes the site the application relates to.

Te Rūnanga o Waihao appreciated the opportunity to meet on 13 July 2023 to discuss the proposed solar array development of Section 3 SO Plan 384036 within Te Manahuna (the Mackenzie District); and also for the opportunity to visit the application site on 19 July 2023.

This letter is written in support of the memorandum dated 12 September 2023 sent by Arowhenua Environmental Consultancy Limited, which advised that following consideration of the application Arowhenua is unable to support the application.

Te Rūnanga o Waihao fully support the position and reasoning reached by Arowhenua in its entirety.

Nāku noa, nā

Dr Kate Timms – Dean
General Manager
Mana Taiao

cc Aoraki Environmental Consultancy Limited
 Te Rūnanga o Waihao
 Te Rūnanga o Moeraki

Aukaha
Level 2, 266 Hanover Street, P O Box 446, Dunedin 9054, New Zealand
Phone - 03 477 0071
info@aukaha.co.nz www.aukaha.co.nz

5. AECL and Aukaha - Hui Memo 7 November 2023



Memo

To: Richard Homewood, Dee Isaacs, John Telfer
From: Greg Hay
CC: File
Date: 7 November 2023
Re: Online meeting with delegates from Arowhenua, Waihao, AEC and Aukaha

Following requests from FNSF to wish to re-engage with Rūnanga after their formal letter advising they could not support the solar farm application; an invitation was sent by AEC Ltd to an online meeting on 7 November 2023 at 10.30am. In attendance was Richard Homewood, Greg Hay and Dee Isaacs on behalf of FNSF. The following individuals were on the meeting invite on behalf of three representative rūnanga - Arowhenua, Waihao and Moeraki - although it was not possible to identify if all were on the call as there were no introductions and the meeting was short.

1. Ally Crane (AEC Ltd)
2. Kylie Hall (AEC Ltd)
3. Tim Vial (Aukaha)
4. Trudy Heath (Waihao)
5. Pam Walker (Aukaha)
6. John Henry (AEC Ltd) – John was not on the initial meeting invite and was identified post meeting through search.

The meeting began with myself introducing the agenda that was circulated to the group before the meeting with some of the participants above.

A person unknown to FNSF, but later identified as John Henry, intervened to express the dislike by all three of the representative rūnanga chairs for the meeting being called for. Mr Henry also took umbrage with the appearance I was starting the meeting without first acknowledging that this meeting was an invitation from the rūnanga representatives.

John Henry expressed some concerns relating to FNSF having requested that someone outside of the rūnanga had been asked to prepare a Cultural Impact Assessment regarding the proposal. FNSF representatives acknowledged the company had no knowledge of this. Richard informed that the SWDC had recently asked for one as part of the consent



application process but that we had not added any further comment than this, or actioned anything. Henry informed us that only they as rŭnanga representatives and mana whenua are able to do a CIA. We did not dispute this and acknowledged this.

Mr Henry also said he was 'not happy' with the fact FNSF had been speaking to other people about the proposal and engagement process. Mr Henry did not explain who these people were or when this had taken place. I explained we had not spoken to any other parties outside of the runanga engagement process. It may relate to emails I have sent directly to rŭnanga delegates asking for the opportunity to re-engage with new information, rather than going through the agencies AEC and Aukaha. I have also informed Jacquie Caine of Ngai Tahu (who made the initial introductions to the rŭnanga on our behalf) that the rŭnanga did not support the solar farm but that we were hoping to continue to engage with them.

Dee Isaacs spoke to clarify that John Henry, on behalf of the three representative rŭnanga, did not wish to continue with this meeting and that there was no desire for further engagement. This was confirmed by John Henry and as such Dee suggested the meeting end.

Disengagement from this meeting was effective immediately and the meeting closed.

6. DPI Consulting Ltd - Assessment of Kā Rūnaka (Arowhenua, Waihao and Moeraki) consultation about The Point solar farm and how this has informed the project through design and mitigation

8 April 2025

Assessment of Kā Rūnaka (Arowhenua, Waihao and Moeraki) consultation about The Point solar farm and how this has informed the project through design and mitigation

Prepared for Far North Solar Farm Ltd (FNSF)

Prepared by Dee Isaacs, DPI Consulting Ltd

1. Purpose

- Assess the Kā Rūnaka submissions and communiques through a te ao Māori lens considering their concerns about cultural, environmental and cumulative effects.
- Analyse how the technical reports (Stormwater report, Assessment of Environmental Effects (AEE), Ecological Enhancement Plan (EEP), Landscape and Visual Impact Assessment (LVIA) and ecoLogical Solutions assessment of impact on avifauna) address these concerns and provide alignment with Ngāi Tahu cultural values using publicly available iwi documents such as the Ngāi Tahu Freshwater Policy Mahaanui Iwi Management Plan (IMP) and Te Mana o Te Wai framework.
- Review FNSF engagement with Kā Rūnaka as described in Engagement Log and identify how outcomes have informed the project

This analysis evaluates how consultation has informed the project and how the values and expectations associated with Kā Rūnaka are meaningfully acknowledged and incorporated into its design where possible.

2 Key Feedback Raised by Kā Rūnaka (Arowhenua, Waihao and Moeraki)

2.1 Cultural values, rights and interests (RMA s6(e))

Kā Rūnaka Feedback

- The proposal could further degrade wāhi tūpuna and cultural landscapes in Te Manahuna, weakening connections to place.
 - The project does not sufficiently recognise the spiritual and historical values tied to the ancestral lands and waterways near the site.
 - The development may limit the ability of future generations to reconnect with their whenua and traditions.
-

- The solar farm offers little opportunity to enhance or preserve the indigenous ecosystems unique to Te Manahuna and that the mitigation proposed is limited to the establishment of planting around the periphery of the site.

Mitigation & Alignment with existing Ngāi Tahu Values

- The AEE acknowledges the significance of the site to Ngāi Tahu and analysis of FNSF engagement with rūnaka indicates an awareness of this also.
- The AEE and LVIA both demonstrate the solar farm will not be visible from most public viewing locations due to its isolation and the nature of the flat surrounding landscape. In response to rūnaka visual sensitivities, the solar farm has adopted a 1P tracker design (one panel that tracks the sun's movement), rather than 2P, in order to keep the maximum height of the panels as low as possible making them less visible from distance.
- The AEE and LVIA identify the importance of renewable energy in addressing the negative effects of climate change, and the place of new solar generation in that solution. This aligns Ngai Tahu's Climate Change Action Plan, Te Kounga Paparangi, which outlines ambitious goals to reduce greenhouse gas emissions and enhance environmental sustainability. A key objective is to achieve 100% renewable energy use within their operations and those of their partners, with a focus on increasing the uptake of renewable energy sources.
- The concept of Ki Uta Ki Tai, meaning "from the mountains to the sea," embodies a holistic approach to environmental management, recognising the interconnectedness of ecosystems. This perspective is integral to Ngāi Tahu's environmental strategies, ensuring that actions in one part of the environment consider impacts throughout the entire system. Implementing renewable energy initiatives aligns with this philosophy by promoting sustainable practices that benefit the broader ecosystem.
- Following engagement through a site visit with Arowhenua and Waihao, the approach to ecological restoration outlined in the EEP changed to a more adaptive management programme to allow appropriate species indigenous to the area to establish, rather than a mass-planting approach of a wider mixture of plants, including species not native to Te Manahuna as previously planned. Rūnaka made clear to the Applicant the importance of indigenous ecosystems unique to the area. In response the Applicant intends to expand mammalian pest control efforts beyond the confines of the solar farm to include the river and delta areas on either side of the boundary. This will provide significant benefit to indigenous ecosystems currently not protected through this activity. Combined, these ecological restoration plans align with Ngāi Tahu's own practical conservation efforts. The Tāwhaki project at Kaitōrete is a notable example, where Ngāi Tahu, in partnership with the New Zealand government, is undertaking ecosystem restoration activities including immediate rehabilitation work such as planting native species and implementing pest control projects to protect and enhance the local biodiversity.

- In recognition of the spiritual and historical values tied to the ancestral lands and waterways near the site, The Applicant has offered Kā Rūnaka naming rights of the development. This clear symbolic connection would reinforce mana whenua identity to the area and enhance the ability of future generations to reconnect with their whenua. It is also noted that the Applicant's possession of the site, and willingness to positively engage with Kā Rūnaka, provides significantly greater opportunity for access to the site than is currently available.
- Assessing the benefits of new renewable energy generation against any perceived loss or alteration of 'wahi tupuna' is something only mana whenua can speak to. However, the Ministry of Business, Innovation and Employment (MBIE) and the Ministry for the Environment (MfE) are proposing changes to strengthen national direction on renewable electricity generation (REG) and electricity transmission (ET) as the most effective way to improve consenting under the Resource Management Act 1991 (RMA). These proposed changes, embodied in the NPS-REG, NPS-ET and NES-REG are cumulatively intended to promote and facilitate development of new renewable energy, and show clear government support for the benefits associated with creating new REG.
- The Applicant intends to offer a formal commitment to recognising wāhi tūpuna in public project documentation and planning. This acknowledgement is also seen in the EEP where Kā Rūnaka are explicitly named as a project stakeholder. Onsite educational signage could also acknowledge the significance of wāhi tūpuna and whakapapa connections.

2.2 Cumulative effects and Spatial Planning

Kā Rūnaka concerns

- The potential cumulative effect of solar farms within Te Manahuna will further erode wāhi tupuna.
- Lack of a strategic approach to solar farm development in Te Manahuna.

Mitigation & alignment with Ngāi Tahu values

- The Applicant is supportive of the concept of spatial planning on a national scale for renewable energy development projects but the responsibility for implementing any such activity lies with government and local authorities.
- Spatial planning for solar farms does not currently exist in New Zealand legislation with development primarily governed by the RMA which regulates land use. The Fast Track Act is another vehicle which provides direction on spatial planning at a national level.
- The Panel cannot consider cumulative effects based on any supposed projects that have not been submitted for FT resource consent. There are only two other solar projects in the FT process - Tekapo (but this is a long way off) and Haldon Arm

(Lodestone) which is close. However, we believe Haldon will have trouble connecting as The Point is taking the remaining available capacity in the lines which run through both sites.

- Capacity restraints within the current transmission infrastructure that runs through the Mackenzie Basin limits the amount of new generation able to connect to the national grid, meaning any potential cumulative effect of development will be limited. The 450MWp generated by The Point will take much of the existing remaining capacity within the Islington-Benmore 220Kv line which runs through the site meaning no other solar farms will be able to be built in the area until extra transmission is created.
- The government is developing a National Environmental Standard for Renewable Electricity Generation (NES-REG) to streamline and standardize the consenting process for renewable energy projects, on a national scale. The NES-REG recognises that the development of renewable energy generation is critical to the country's future wellbeing and prosperity and aims to ensure greater weight is given to the national significance and benefits of such development. It also aims to enable REG activities in areas where there are potential adverse effects on local amenity values, so long as effects are avoided, remedied or mitigated to the extent practicable.
- The Applicant is willing to engage in regional planning discussions to provide technical expertise which may inform any such discussions and provide alignment with Ngāi Tahu's strategic approach to land management.

2.3 Visual & environmental effects

Kā Rūnaka Concerns

- The scale of the solar farm could erase the visibility of cultural landscapes.
- Industrialisation could further separate mana whenua from ancestral sites
- Solar farms offer little opportunity to enhance or preserve the indigenous ecosystems unique to Te Manahuna and that the mitigation proposed is limited to the establishment of planting around the periphery of the site.

Mitigation & Alignment with Ngāi Tahu Values

Environmental Effects

- The site is currently classified as a 'critically under protected' land environment and without development will likely remain in its current degraded state. The objectives outlined in the EEP intended to be adopted in development of the project include setting aside an 89ha area for ecological restoration of locally indigenous vegetation. The EEP also includes creating habitat for locally indigenous lizards and invertebrates, including a bespoke breeding reserve for robust grasshoppers. Combined, this activity aligns with Ngai Tahu's Environmental Kaitiakitanga vision of environmental stewardship as seen in their own active activity planting indigenous species to

rejuvenate ecosystems, support biodiversity, and restore cultural landscapes. The Applicant's desire to work with mana whenua on the further development and implementation of the EEP directly reflects their influence.

- The EEP names mana whenua as stakeholders and the Applicant will seek further input from them during its further development as an ongoing workstream post consent, as well as in implementation, thus ensuring iwi Maori perspectives are provided for and integrated into the project.
- In response to Kā Rūnaka korero throughout the engagement process, the importance of the surrounding ecology to mana whenua, not just on the site itself, was made clear to the Applicant. As a result, pest control efforts are now intended to be expanded beyond the site to encompass the river and delta areas adjacent to the site for the benefit of indigenous ecology. This is expected to provide substantial benefit for avifauna in these areas and aligns with existing Papatipu Rūnanga activity in pest control initiatives, often in collaboration with government agencies and local communities, in other locations throughout the South Island.
- Combined, the activity described above has been assessed by the EEP as providing a net ecological gain for the area and is in line with Ngai Tahu's principles of guardianship and stewardship.
- In recognition of Kā Rūnaka korero about the taonga status of the Black Kaki, the Applicant has agreed to work with the Department of Conservation to explore opportunities to support its Kaki Recovery Programme, an initiative also supported by Ngai Tahu.
- The importance of the awa which run adjacent to the site to Kā Rūnaka has ensured the Applicant has expressly investigated if the development would have an adverse effect on water quality. The Stormwater & Water Quality Report confirms no negative impact on watercourses near the site which aligns with Ngāi Tahu's Te Mana o Te Wai framework. The report confirms there will be no adverse impact on natural water bodies addressing another aspect of cultural concern.
- The proposed development complies with Section 18: Natural Hazards of the Mackenzie District Plan and with the Objectives and Policies of Environment Canterbury's Land and Water Regional Plan. E.Coli and other faecal contaminants may decrease as cattle grazing is to be replaced with sheep grazing.

Visibility of cultural landscapes

- While the solar farm will introduce a new built form element to the area, the flat nature of the site means it will not introduce large changes to the landform or effect the legibility of the outwash plain environment in which it sits. The low-lying nature of the solar farm design also means the landform legibility will remain evident and intact from beyond the site. This low-lying nature, and the effect of strategic screening plantings as described in the AEE and LVIA, also limits visual effects from

most public places and the visual coherence of this landform, and its aesthetic values will remain intact.

Industrialisation could further separate mana whenua from ancestral sites

- The Applicant has consistently demonstrated a desire and willingness to work with Kā Rūnaka to inform the development and long-term operation of the site. Inherent in this is a commitment to actually enhancing access to the site through working in partnership, something that is not currently available as the site is in private ownership and farmed.
- As outlined in the AEE, there are no recorded historical ancestral sites of cultural significance on the solar farm site itself.

2.4 Economic & employment opportunities for Māori

Kā Rūnaka concerns

- The project does not clearly provide economic benefits to iwi

Mitigation & alignment with Ngāi Tahu values

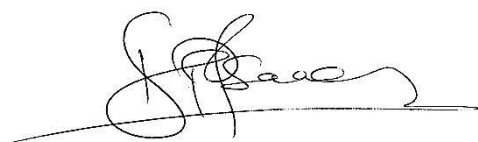
- Capital costs are expected to be in the range of \$600m and development of the project will create significant economic activity within the South Canterbury region. Construction is expected to take up to two to three years and create some 200 full time equivalent roles. Local contractors will be required providing services such as civil engineering, surveying, accommodation, hospitality, planting and local labour.
- The Applicant has successfully worked with other iwi Maori on solar farm development sites around the motu to provide conditions for direct economic opportunity to flow to iwi, showing an intent to provide direct benefit to iwi where possible. The full scope of how benefit can be achieved can only be realised once a project enters detailed planning post consent.
- The Applicant has demonstrated a willingness to engage directly with Kā Rūnaka to facilitate economic opportunities through the project as has been clearly communicated in engagement efforts, detailed in the engagement log. Specific mention of native plant supply and planting, for instance, has been discussed with Kā Rūnaka as the Applicant is aware Arowhenua own and operate a native plant nursery and possess capacity to provide plants and expertise which could be drawn upon through the execution of the EEP. This willingness would seem to align with Ngāi Tahu's Future Growth Strategy.
- By demonstrating a willingness to integrate Te Ao Māori principles into project planning, the Applicant has shown a desire to enhance alignment with Kā Rūnaka values while ensuring a responsible transition to renewable energy.
- The project has support from the South Canterbury Chamber of Commerce.

Date 8 April 2025

Name Dee P Isaacs

Director/Planner

DPI Consulting Ltd Consulting Ltd

A handwritten signature in black ink, appearing to read 'DPI Isaacs', written over a horizontal line.