



6 August 2025

Draft National Infrastructure Plan
New Zealand Infrastructure Commission / Te Waihanga
Wellington 6011

Tēnā koe,

TE RŪNANGA O NGĀI TAHU RESPONSE - DRAFT NATIONAL INFRASTRUCTURE PLAN

1. Ngāi Tahu is a Treaty partner, and one of Te Waipounamu's most influential long-term investors. We have a direct and growing interest in infrastructure across housing, transport, renewable energy, property development, three waters, logistics and trade, and digital connectivity.
2. Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) supports the Infrastructure Commission's Draft 30-Year National Infrastructure Plan (**the Plan**) as a vital, bipartisan framework for coordinated infrastructure delivery. Te Rūnanga welcome its recognition of the Māori-Crown partnership under Te Tiriti and strongly back investment models that enable iwi-led development.
3. **Appendix One** highlights the track record of Ngāi Tahu as a proven delivery partner, strategic investor, and experienced developer of whānau-centred, commercially successful projects that reflect cultural values and navigate complex planning frameworks.
4. While we have provided targeted feedback on the draft Plan below, Te Rūnanga would **welcome the opportunity to meet directly** with the Infrastructure Commission to explore how we can partner to deliver infrastructure more effectively across the Ngāi Tahu takiwā.

Feedback on the Draft Plan

5. Te Rūnanga agrees with the Plan's recognition that infrastructure projects are often unnecessarily time-consuming and expensive. The lack of dedicated policy and regulatory tools for infrastructure has been prohibitive to economic growth and community aspirations. The system-wide approach of the Plan is a step in the right direction, but would benefit from greater recognition of the role of Treaty partners in public and private sector activity.
6. The Plan is a critical opportunity to recognise iwi such as Ngāi Tahu who hold rangatiratanga and are experts in understanding the environment, and simultaneously, as delivery partners with capital, capability, and a track record of successful projects. Iwi are more than 'stakeholders'. We want the Plan to provide for iwi who are ready to invest. That means:
 - a. **Recognising iwi as major investors:** The Plan acknowledges that iwi and Treaty relationships have a role in infrastructure without recognising the significance this holds in practice. With a large Takiwā and capital base, Ngāi Tahu can work at multiple scales and address the challenges of having a wide asset distribution area. Express recognition of scale potential can address the lack of awareness of the strategic value of iwi partnerships. Furthermore, as an iwi, we bring an inherently intergenerational approach to investment. Ngāi Tahu is essentially unconstrained in terms of investment duration and structuring,

making us ideal investment partners for infrastructure projects designed to serve communities for generations to come.

- b. **Equity of essential services:** A shift towards better managing the infrastructure we already have by prioritising maintenance and optimisation of existing assets must not prejudice communities who lack essential services requiring new builds. For example, within the Ngāi Tahu Takiwā, 10 of the 18 Papatipu Rūnanga marae are not connected to reticulated water and our communities have historically been left behind due to underinvestment.
- c. **Enabling quality engagement:** While the Plan refers to genuine and respectful collaboration, it fails to recognise the critical components that make iwi engagement worthwhile: namely engaging as early as possible, maintaining clear lines of communication, acting consistently with the relevant context (i.e. rangatiratanga status, Treaty settlement commitments) and being open to exploring strategic alignment with iwi-led projects.
- d. **Unlocking iwi planning:** The Plan should recognise that iwi have a role in ensuring there is an effective interface between the Plan, spatial plans and other planning documents such as iwi management plans. There must be clear mechanisms for iwi to participate in regional infrastructure planning, consenting, and governance processes. As set out in the Plan, iwi have different infrastructure needs and there are also local values, interests and sites of cultural significance that are important to ensure infrastructure is designed appropriately and in the right location.
- e. **Enabling sustainable outcomes:** Te Rūnanga experience is that protection of the environment and economic growth go hand in hand. The Plan lacks adequate consideration of how environmental performance affects return on investment, wellbeing and service levels at inter-generational scales. When the new resource management system is in place, the Commission should consider how the Plan (or other tools) could support positive feedback loops such as projects that have positive benefits and innovative funding systems that invest back into the environment.
- f. **Investing in data infrastructure:** The Plan encounters issues with data availability, low reliability, insufficient policies and poorly integrated systems, but only considers limited improvements to the National Pipeline. As reforms are considered for environmental information systems (such as in response to the Parliamentary Commissioner for the Environment's paper advocating for a federated system for environmental information), the Commission should consider how infrastructure planning could benefit from investment in next-generation solutions to unlock data-driven decision-making.
- g. **Recognising demographic shifts in infrastructure planning:** New Zealand is facing a demographic freight train: a declining birth rate, a rapidly ageing population, and a shrinking workforce. These shifts will place increasing pressure on health and social services, reduce the rate of natural economic growth, and challenge the sustainability of our infrastructure systems. The Plan should explicitly consider how demographic change will impact demand for infrastructure across housing, transport, and social services. For iwi like Ngāi Tahu – who are long-term intergenerational impact investors – there is both a risk and an opportunity. Infrastructure planning must support population retention and attraction in the regions, facilitate age-friendly communities, and ensure resilient services for smaller, dispersed populations. Ignoring these demographic realities risks misaligned

investment and missed opportunities for iwi-led development that actively addresses these macro trends.

7. Many of the recommendations outlined in the Plan are dependent on new statutory tools and planning environments currently under development, such as the resource management and water services reforms. The Plan reflects a moving picture; its recommendations may shift as other changes progress. It is critical that the Commission engages with Ngāi Tahu as the Plan is further developed and changed.
8. The South Island economy thrives when iwi are empowered to lead sustainable investment and development at scale. We welcome the opportunity to meet and discuss how we can progress this important kaupapa together.

Nāku noa, nā

Ben Bateman,
Kaihautū | Chief Executive Officer

APPENDIX ONE: CASE STUDIES

Case Study 1: Wigram Skies (Christchurch)

The Wigram Skies development in Christchurch is a major residential and commercial project delivered by Ngāi Tahu Property, a subsidiary of Te Rūnanga o Ngāi Tahu. Built on the site of the former Wigram Aerodrome (previously Crown land), this master-planned development is a leading example of Ngāi Tahu's capability as an infrastructure and urban development provider. For a short video explainer, see [here](#).



Key Features:

- **2,000+ homes** built across a 116-hectare site, creating a vibrant, well-connected community.
- Integrated **infrastructure delivery**, including roads, stormwater, parks, schools, and public spaces.
- Development of **The Landing**, a successful commercial and retail centre that supports local employment and economic growth.
- The historic runway has been retained as a main street, and the control tower and hangars preserved.
- High standard of **urban design and environmental sustainability**, including green space integration and water-sensitive design.
- Long-term planning aligned with **Ngāi Tahu values** of intergenerational stewardship, community wellbeing, and respect for the land.

Case study 2: Te Pā Tāhuna (Queenstown)

Te Pā Tāhuna is uniquely set to become the new heartbeat of Tāhuna - a thriving community close to all Queenstown has to offer. On the former Whakatipu High School site, Ngāi Tahu and Crown partners have initiated infrastructure works to deliver over 300 new homes (including 105 KiwiBuild units), alongside commercial spaces. It is a master-planned mixed-use community centrally located on Gorge Road in Queenstown. Early stages sold out quickly, showing market appetite and execution capability. Stage 2 of this development commenced in early 2025 and will deliver 66 one and two bedroom apartments, built across three 3-storey buildings.



Key features:

- **Over 300 homes** planned, including apartments, townhouses, and live-work units.
- The name *Te Pā Tāhuna* gifted by mana whenua reflects deep connection to place. Collaboration with southern rūnanga and Aukaha Ltd ensures **cultural narratives** are reflected in built form.
- **Major infrastructure delivery:** roads, footpaths, stormwater, wastewater, and utilities. Rain gardens and green infrastructure to manage stormwater more sustainably. Staged civil works coordinated with construction phases.
- **91% of demolition waste** diverted from landfill.
- **Partnership with Ministry of Housing and Urban Development** on delivery of public and affordable housing outcomes.
- A focus on **social procurement** with local job creation and engagement with Māori businesses.

Case study 3: Pound Road Industrial Development (Christchurch region)

Ngāi Tahu Property has new industrial developments in the pipeline in the south-west of Christchurch. It will primarily involve subdivision and land development to create the specified industrial sites and associated infrastructure development, including roads, utilities, and other necessary facilities. This would facilitate subsequent development activity, including the construction of industrial buildings and facilities and the implementation of landscaping and environmental management measures.

The project, located adjacent to an existing industrial zone and in close proximity to State Highway 1, State Highway 73, rail arterials and Christchurch International Airport, is poised to deliver infrastructure of significant regional importance in several ways:

- **Industrial Land Development:** The project addresses a critical need for freehold industrial land. The project will increase capacity and facilitate the growth of industries that are vital to the region and the nation.
- **Economic Impact:** The project is expected to stimulate economic growth and create jobs, both during construction and through the subsequent establishment of business activity.
- **Specialised infrastructure:** The project will develop infrastructure that caters to highly specialised sectors, particularly logistics, recognising that the area is the premium logistics warehouse location due to its strategic location.
- **Freight and Warehousing:** The project will provide for future industrial land use for freight and warehousing, sectors that are essential for the movement of goods at a regional and national level.

Ngāi Tahu Property is progressing this project under the Fast-track Approvals Act 2024. It will be a strategic industrial infrastructure project that meets Crown priorities for regional economic development.

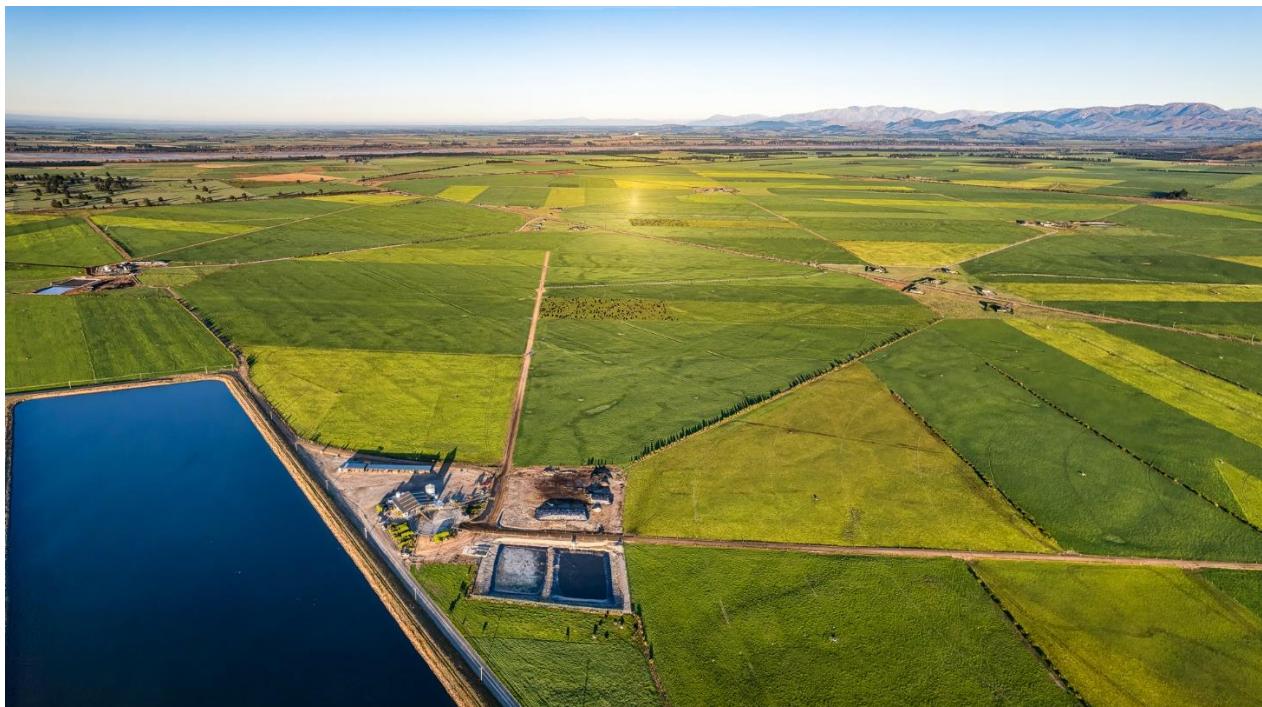
Case Study 4: Christchurch Civic Building – Te Hononga

Te Hononga is a six level office building encompassing an area of 19,300m² that was redeveloped in 2010 to provide quality office accommodation civic chambers and conference rooms for Christchurch City Council. The building has a six green star rating for design.



Case Study 5: Te Whenua Hou Te Whenua Whitiora (North Canterbury Farm)

Ngāi Tahu Holdings also owns and operates a number of farms covering ~45,000 hectares in Te Waipounamu. The size and scale of our farming operations have provided opportunities for NTHC to develop capability in building and operating on-farm water infrastructure such as races and storage ponds, and they are working collaboratively regarding water storage at scale with catchment regions in both the Waimakariri and Balmoral regions. Water monitoring wells, variable rate irrigation, and water telemetry units are utilised across all NTHC farming operations.



Case Study 6: Tū Waka Waipapa (Carpark Building)

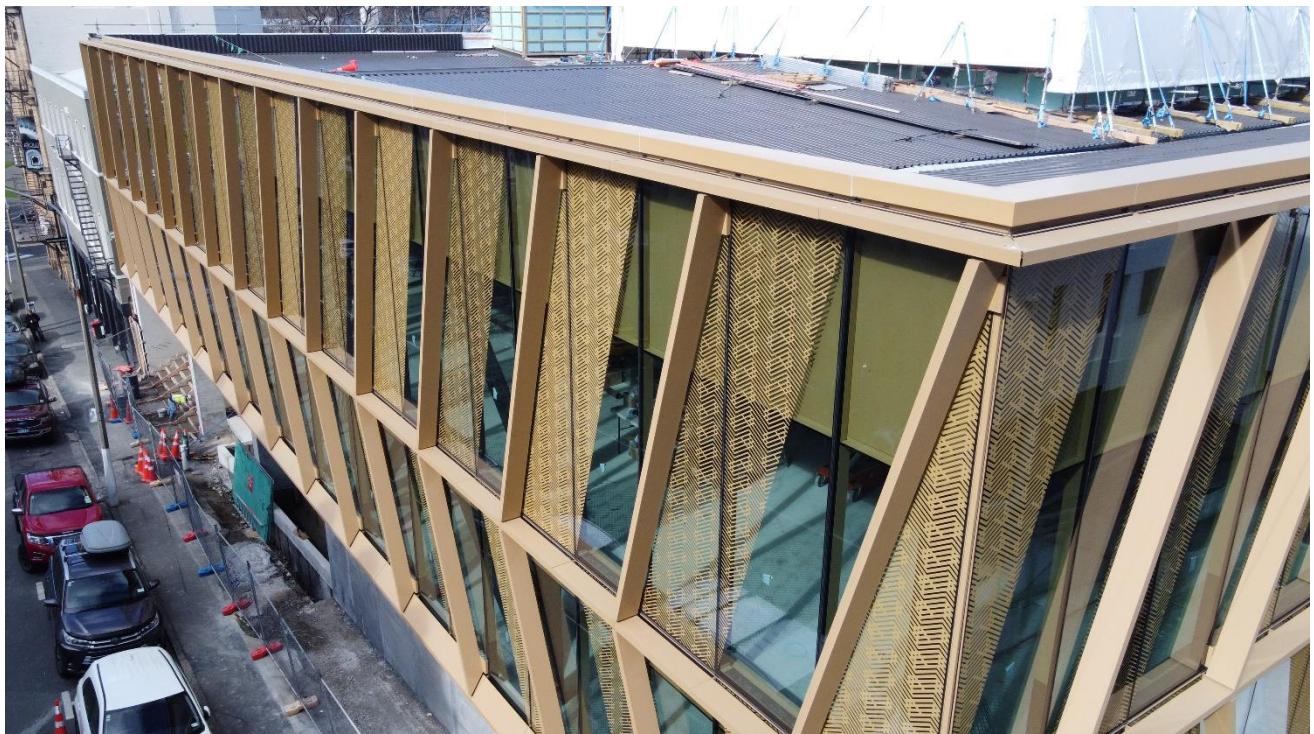
Completed in 2023, Tū Waka Waipapa comprises an eight-storey split level car park building, accommodating a total of 469 car parks situated adjacent to Christchurch City Hospital. This development was also constructed in partnership with local hapū Ngāi Tūāhuriri.



Case Study 7: ACC Building – Dunedin

ACC Ōtepoti is a circa 8,200m², four level office building completed in 2025 and situated on a prominent Ōtepoti central business district site to be occupied solely by ACC.

The exterior glazing, designed by local Ngāi Tahu artist Kirsten Parkinson, includes printed artwork which reflects the woven pattern of a traditional poti basket. It also has a functional purpose and was developed in conjunction with building energy modelling software to control daylight levels to reduce the energy use of the building.



Case Study 8: Mint Aotearoa – Renewable Energy Joint Venture

Mint Renewables (established by Infratil and Commonwealth Superannuation Corporation in 2022) and Ngāi Tahu Holdings have entered a joint venture to develop large-scale, high-quality wind, solar, and storage projects in New Zealand.

The 'Mint Aotearoa' venture begins with an initial combined investment of \$100 million.

Mint Aotearoa represents Ngāi Tahu's growing capability in large-scale infrastructure development, as well as its commitment to enabling sustainable renewable energy generation in New Zealand.



For further relevant examples see [Portfolio of Developments & Investments | Ngāi Tahu Property](#)