

# Application Form

Use this template for all applications for consent to acquire land and/or significant business assets. This accompanies the application submission webform.

It is important that you provide us with accurate and complete information. It is an offence to make a false or misleading statement or material omission in any information or document provided to us.

We may use relevant legislation to share details of this application with other agencies to the extent permitted by law and as required to complete the application process.

## Instructions

- Please do not remove the instruction text from this template.
- Use the latest version of this template. Download this template from our website before each use.
- Follow the guidance in each section. Provide all required information.
- Be concise and use plain English. Use headings and tables (if relevant) and explain industry terminology.
- This is a living document and must be updated during the assessment process if further information is provided. Updated versions of this document must be recorded in the table below and with tracked changes so we can easily identify those updates.

## Key information

|                  |                             |
|------------------|-----------------------------|
| <b>Applicant</b> | Hampshire (NZ) Limited      |
| <b>Pathway</b>   | Benefit to New Zealand Test |

## Electronic Filing Requirements

This application form and your investment plan and supporting information must be submitted electronically using our [Application Submission Webform](#). The webform is a secure upload site and provides details of our electronic filing requirements.

**Please do not provide hard copy versions of your documents.**

| Checklist |  |                                     |
|-----------|--|-------------------------------------|
| 1.        | Electronic copy of your signed application (without attachments)   | <input checked="" type="checkbox"/> |
| 2.        | Electronic copy of each attachment to your application (number and describe each appendix as follows: 'Attachment 01 – X')   | <input checked="" type="checkbox"/> |
| 3.        | All PDF documents are:<br>'Printed to PDF', or scanned and OCR'd (i.e., all text in the document can be copied)<br>Free from security restrictions<br>In colour (if the document contains colour)<br>If scanned, at 300 dpi (where possible) | <input checked="" type="checkbox"/> |

## Version control

Record the details of each version of the application form below.

| Version | Date         | Description                    |
|---------|--------------|--------------------------------|
| 1.0     | 23 July 2025 | First version submitted to OIO |
|         |              |                                |
|         |              |                                |

Declaration

By signing the below I agree that:

- The information provided in this application form (including any attachments) is true, correct and complete.
  - I have read and understood the privacy and information sharing notice in **Attachment 1** of this document.
- I am the Applicant or I am a representative of the Applicant who has authority to sign on its behalf (e.g. director of the Applicant).

Applicant signature

Sign the application below

[Sign here]

Andrew Hoffman

Date [e.g., 01/01/25]

23 July 2025

|                                    |      |
|------------------------------------|------|
| Andrew David Hoffman               | Date |
| Director of Hampshire (NZ) Limited |      |

Application signature – Amended version

You may be required to sign the amended application form if there are material changes.

Sign the amended version of the application form below if we request you to.

[Sign here]

Date [e.g., 01/01/25]

|                                    |      |
|------------------------------------|------|
| Andrew David Hoffman               | Date |
| Director of Hampshire (NZ) Limited |      |

# CERTIFICATE *of* SIGNATURE

REF NUMBER  
YJFZC KXT4R GVLFS XMNUH

DOCUMENT COMPLETED BY ALL PARTIES ON  
23 JUL 2025 03:46:38 UTC

## SIGNER

**ANDREW HOFFMAN**

EMAIL  
ANDREW@HPG.AU

## TIMESTAMP

SENT  
23 JUL 2025 03:41:19 UTC

VIEWED  
23 JUL 2025 03:46:23 UTC

SIGNED  
23 JUL 2025 03:46:38 UTC

## SIGNATURE

*Andrew Hoffman*

IP ADDRESS  
107.191.2.6

LOCATION  
PARK CITY, UNITED STATES

## RECIPIENT VERIFICATION

EMAIL VERIFIED  
23 JUL 2025 03:46:23 UTC

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## Definitions

Add defined terms you will use in this application in the table below. Use meaningful terms that are easily remembered and will be used consistently throughout this application - for example, abbreviated company names for quick reference. Ensure that the terms are not duplicated with different meanings.

|                    |   |
|--------------------|---|
| Act                | Overseas Investment Act 2005.   |
| Applicant          | Hampshire (NZ) Limited, a New Zealand company, company number 8484279 NZBN: 9429050862986, incorporated on 27 September 2022.   |
| AZZ Pty Ltd        | AZZ Pty Ltd, an Australian company, ACN 107 919 988, incorporated on 9 February 2004.   |
| Business Agreement | the Agreement for Sale and Purchase of a Business dated 1 July 2025.  |
| Consent Holders    | The Applicant and Thornton Beach (NZ) Limited, a recently incorporated New Zealand company, wholly owned by the Applicant.  |
| Investment         | the Consent Holders' acquisition of a leasehold interest in approximately 7.9950 hectares of land located at Thornton Beach Holiday Park, Thornton, Whakatane.                  |
| IWC                | individuals with control of the relevant overseas person.   |
| Land               | a leasehold interest in approximately 7.9950 hectares of land located at Thornton Beach Holiday Park, 163 Thornton Beach Road, Thornton, Whakatane in the Bay of Plenty region. |
| Land Agreement     | the Agreement for Sale and Purchase of Real Estate dated 1 July 2025.   |
| OIO                | Overseas Investment Office.   |
| Regulations        | Overseas Investment Regulations 2005.   |
| ROP                | the relevant overseas person.   |
| SCL                | Schwarz Consultancy Limited.  |

Vendor

Thornton Beach Holiday Park (2015) Limited, who has a leasehold interest in the Land.

VIF

Vendor Information Form.

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## Confidentiality

Does any information in this application need to be kept confidential from other parties to this application?

*There is no need to make general confidentiality statements.*

### Response

1. Yes, the Applicant request that all commercially sensitive information regarding specific development plans, capital expenditure, new jobs and projected revenue be kept confidential from the vendor.

## Decision date

Is there a date by which the decision is requested? If so, provide the requested decision date and explain the reason why a decision is required by this date.

*Include reference to the date of any Overseas Investment Act condition or other important date such as court date for scheme of arrangement.*

### Response

2. As per clause 23 of the Agreement for Sale and Purchase of Real Estate dated 1 July 2025 ("**Land Agreement**"), Overseas Investment Office ("**OIO**") consent is required within 90 working days from the date on which the Agreement is signed, which is 5 November 2025. There is an ability to extend the OIO condition date of 5 November 2025 by a further 60 working days, as per clause 23.5 of the Land Agreement.
3. The Applicant requests that the OIO issues their decision by **11 September 2025**. This allows the OIO 35 working days to process the application in accordance with the Ministerial Directive Letter dated 6 June 2024 that expects the OIO to process 80 percent of consent applications within half the relevant timeframe. The Applicant submits the 35-working day assessment timeframe is achievable given the Applicant is a repeat investor and therefore low risk.
4. A decision before 11 September 2025 will allow time for settlement (due to occur 30 working days after the Land Agreement becomes unconditional) and a smooth transfer of the business and operations before the busy summer holiday period commences.
5. A copy of the Land Agreement is attached as **Appendix 3**.



## Section 1: Investment

Describe the proposed transaction including any steps involved or agreements entered into:

### Response

6. The applicant is Hampshire (NZ) Limited ("**the Applicant**"), a company ultimately owned by Andrew David Hoffman (an Australian citizen), through an Australian company, AZZ Pty Ltd.
7. The OIO will be very familiar with Hampshire (NZ) Limited as its wholly owned subsidiary, Hampshire Holiday Parks Limited, previously obtained two OIO consent in 2023 and 2024 (Case: 202200538 and Case: 202300706).
8. The Applicant is seeking consent to acquire a leasehold interest in approximately 7.9950 hectares of land located at Thornton Beach Holiday Park, 163 Thornton Beach Road, Thornton, Whakatane ("**the Land**").
9. The Land is leased from Whakatane District Council (lessor) and a copy of the lease is attached as **Appendix 4**. The leasehold record of title is 1170110 and the current term is 21 years 1 month from 1 March 2024, with a right of renewal for a further 33 years. The land is a recreational reserve controlled by the Whakatane District Council. As noted at clause 4 of the lease, the lessee shall use the land "for the purpose of a public camping ground (including the provision of self-contained cabins) for the holidaying public, relocatable homes, and as a recreational reserve".
10. The Applicant's wholly owned subsidiary, Thornton Beach (NZ) Limited, entered into sale and purchase agreements with Thornton Beach Holiday Park (2015) Limited ("**Vendor**") for both the business assets and the leasehold interest in the Land on 1 July 2025. A copy of the Agreement for Sale and Purchase of a Business ("**Business Agreement**") is attached as **Appendix 5**. As mentioned above, the Land Agreement is attached as **Appendix 3**. The Business Agreement and Land Agreement are interdependent and will terminate if either is avoided, cancelled or terminated.<sup>1</sup>
11. The conditions of the Land Agreement include the following:
  - a) Clause 22 - the Vendor obtaining consent from the lessor, Whakatane District Council, to the assignment of the lease to the purchaser within 60 working days from the date the agreement is signed – this date is by 23 September 2025 – the Applicant is confident that consent from the lessor will be obtained before then; and

<sup>1</sup> Business Agreement attached as Appendix 5, clause 24.1 and Land Agreement attached as Appendix 3, clause 26.1.



- b) Clause 23 – the purchaser obtaining consent under the Overseas Investment Act 2005 (“the Act”) within 90 working days from the date of the agreement, which is 5 November 2025, as mentioned above. However, as mentioned earlier, the Applicant requests a decision before 11 September 2025.

Explain why the transaction requires consent under the Act (including reference to the relevant sections):

Response

12. The Land is classified as “sensitive land” under section 12(a) of the Act because it includes non-urban land that exceeds 5 hectares, as confirmed in the Schwarz Consultancy Limited (“SCL”) Sensitive Land Certificate dated 14 April 2025 attached as **Appendix 6**.
13. The Applicant is classified as an overseas person under section 7(2) of the Act, therefore, consent is required to acquire the leasehold interest in sensitive land under section 12(1)(a)(i) and (ii)(C) of the Act. The Applicant is applying under the benefit to New Zealand test pathway.
14. For completeness, it is noted that the acquisition of the business assets does not require consent under the Act because the consideration is less than the \$100 million threshold.

If you are acquiring a target entity or assets describe what is being acquired.

Response

15. The asset being acquired consists of a leasehold interest in sensitive land, as discussed above. The business of the Thornton Beach Holiday Park includes 90 powered camp sites, cabins and tourist flats, camping area of 86 sites and other holiday park facilities, as explained further in the Investment Plan attached as **Appendix 2**.

If you are [establishing a business](#), describe the business that is being established including the expected date by when the business will have commenced.

Response

16. Not applicable, the holiday park business is already operating.

Does the Applicant have any existing interest in the sensitive assets and/or an existing relationship with the vendor / lessor?

Response

17. As confirmed in the Vendor Information Form ("VIF"), there is no existing relationship between the Applicant and the Vendor. This is an "arms-length" transaction.
18. There are no pre-consent arrangements with the Applicant, except for providing access to the Applicant to undertake due diligence (refer to clause 24 of the Land Agreement).

Detail any pre-conditions to the completion of the acquisition and/or regulatory consents required other than consent under the Act:

Response

19. As discussed above, the transaction requires Whakatane District Council to approve the assignment of the lease. The Applicant is confident that such approval will be obtained.

Explain how the transaction will be funded.

Response

20. The Applicant will fund the purchase approximately [REDACTED] and the remainder through [REDACTED].

## Section 2: Applicant

### Repeat Investor

Has the Applicant, or a related party, applied for consent under the Act before?

*Provide case numbers for any consent applications that were made under a different name or through a related party to allow us to link them in our database. You do not need to provide details of consents made in the applicant's name.*

#### Response

21. The OIO have confirmed that the Applicant is a repeat investor because the relevant overseas persons and individuals with control have all previously met the Investor Test (refer to the OIO's email correspondence attached as **Appendix 7**).
22. Previous applications granted to Hampshire Holiday Parks Limited, a wholly owned subsidiary of the Applicant, are as follows:
- 10 June 2023 - Hampshire Holiday Parks Limited obtained OIO consent to acquire leasehold interests in five holiday parks, including Queenstown Lakeview Holiday Park, Arrowtown Holiday Park, Wanaka Lakeview Holiday Park, Albert Town Camp Ground, and Glendhu Bay Motor Camp (Case Number: 202200538); and
  - 7 February 2024 - Hampshire Holiday Parks Limited obtained OIO consent to acquire a leasehold interest in land located at Kaitiaki Top 10 Holiday Park Limited (Case Number: 202300706).

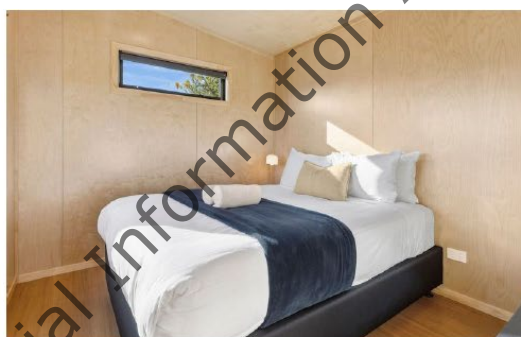
### Business operations

Provide an overview of the Applicant's business operations (both worldwide and any operations in NZ). Include an overview of the parent and other group member's business operations if relevant:

#### Response

23. As explained in previous applications for consent, the Applicant's owner, AZZ Pty Limited, is an experienced caravan park operator in Australia, trading as Hampshire Property Group. AZZ Pty Limited operates a large and diverse portfolio of tourist parks, including over 80 caravan and holiday parks located across Australia.

24. Since 2023 AZZ Pty Limited expanded internationally with the acquisition of 7 holiday parks in New Zealand. A link to their New Zealand website is <https://hampshireholidayparks.co.nz/>.
25. Since the acquisition of the New Zealand holiday parks, Hampshire Property Group have undertaken extensive capital improvements to their Queenstown, Wanaka, Arrowtown and Glendhu Bay holiday parks, exceeding [REDACTED] with a further projected spend of [REDACTED] for projects in their existing New Zealand holiday parks over the next [REDACTED] years.
26. The following photographs provide an example of developments completed at their Wanaka holiday park which includes the installation of five new cabins. For further photographs and details of other completed developments across their New Zealand holiday parks, please see **Appendix 8**.



27. Hampshire Property Group's New Zealand business currently has 8 head office staff working within New Zealand with functions including finance, marketing, revenue management and operations. Since the 2023 and 2024 holiday park acquisitions in New Zealand, the business has employed an additional 11 park-based staff in New Zealand, growing from 37 to 48 in total.
28. For completeness, Hampshire Property Group also includes Hampshire Villages which includes 20 lifestyle villages across Australia providing more affordable retirement living options for the over 50s. For more

information regarding Hampshire Villages, please see the following link:

<https://www.hampshirepropertygroup.com.au/hampshire-villages/>

## Financial position

Give a short summary of the Applicant's financial position:

*Discuss market capitalisation, gross revenue, net profit, net asset value. If the Applicant is an individual (or a group of individuals), provide a brief summary of the Applicant's financial position.*

Response

29. The Applicant's New Zealand asset value exceeds [REDACTED].
30. A copy of the Applicant's financial statements is attached as **Appendix 9**. A copy of Hampshire Holiday Parks Limited's latest financial statements is attached as **Appendix 10**.

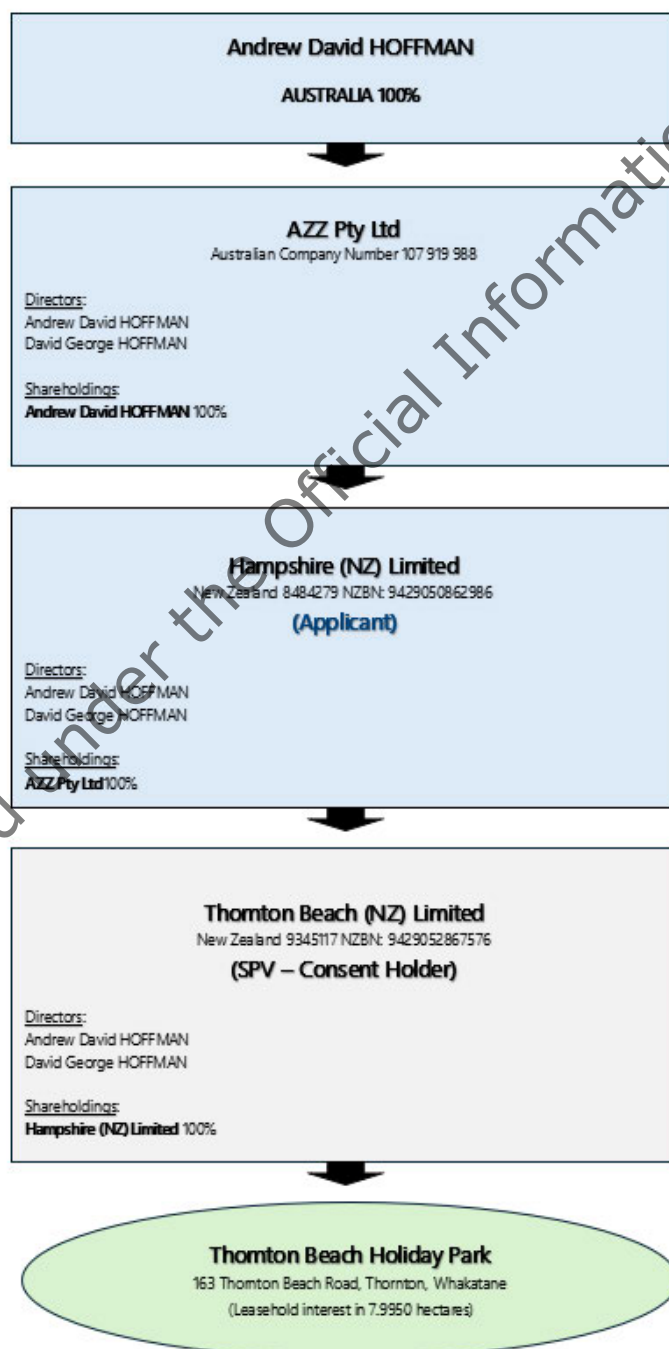
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## Ownership

Explain the ownership of the Applicant (using structure diagrams to illustrate). Please explain here where ownership breakdowns might be different depending on a calculation of voting rights vs capital distribution rights:

### Response

31. The Ownership Structure Diagram shown below sets out the ownership of the Applicant. A copy of the Ownership Structure Diagram is attached as **Appendix 11**.



### Thornton Beach (NZ) Limited

32. As previously advised to the OIO, the Applicant has recently incorporated a wholly owned subsidiary called Thornton Beach (NZ) Limited to hold the Thornton Beach Holiday Park asset. As explained to the OIO, the Applicant intends to establish SPVs for each of its investments in New Zealand. The Applicant requests that Thornton Beach (NZ) Limited is included as a consent holder for this consent. The directors of Thornton Beach (NZ) Limited are the same as Hampshire (NZ) Limited.
33. Thornton Beach (NZ) Limited was incorporated on 26 May 2025. A copy of the Certificate of Incorporation and Company Extract is attached as **Appendix 12**.

### Hampshire (NZ) Limited

34. Hampshire (NZ) Limited is a New Zealand company incorporated on 27 September 2022. A copy of the Certificate of Incorporation and Company Extract is attached as **Appendix 13**.
35. The directors are:
- Andrew David Hoffman; and
  - David George Hoffman.

36. The company is 100% owned by AZZ Pty Ltd.

### AZZ Pty Ltd

37. AZZ Pty Ltd is a company incorporated in Australia on 9 February 2004, ACN 107 919 988. A copy of the Certificate of Registration of a Company and Company Extract is attached as **Appendix 14**.
38. The directors are:
- Andrew David Hoffman; and
  - David George Hoffman.
39. The company is 100% owned by Andrew David Hoffman. A copy of Andrew Hoffman's passport and CV is attached as **Appendix 15**. David Hoffman's passport is included in **Appendix 15**.



## Beneficial ownership table:

In the table below, identify all beneficial owners, individuals with greater than 5% interest (either alone or together with associates) in the Applicant.

*If it is not possible to identify individual beneficial owners, entities may be included in the table instead.*

*For any entities in the table, provide a description of the entity (including who owns/controls it), and if it is not possible to identify the individual why it is not possible to identify the individual e.g. A Norwegian superannuation fund for the benefit of state sector employees managed by the Norwegian Government entity 'X'.*

*We acknowledge that in some cases it may not be possible to identify beneficial owners with holdings below the 5% threshold – these may be included as the entity class 'various owners with <5% interests'*

| Beneficial owner     | Percentage | Description                      |
|----------------------|------------|----------------------------------|
| Andrew David Hoffman | 100%       | Ultimate owner of the Applicant. |
|                      |            |                                  |

## Ownership by country table:

Provide a breakdown of ultimate beneficial ownership of the Applicant by country.

*Avoid grouping countries or listing ownership by continent.*

*For listed companies, an Applicant should provide the most accurate information they can (rounded to one decimal place) about the location of their shareholders and be clear about the source of that information. Widely held shareholding can be recorded as the corresponding region - or if unable to be determined by country use region e.g. North America or select 'Various regions', or if the country has a less than 1% ownership stake.*

| Country   | Percentage (must total 100%) |
|-----------|------------------------------|
| Australia | 100%                         |
|           |                              |
|           |                              |
|           |                              |

## Control

Explain how the investment will be controlled.

*Include an explanation of who:*

- *made the decision to acquire the investment,*
- *who would make the decision to divest the investment and*
- *who can approve significant capital and operating expenditure.*

*Refer to decision making delegations if applicable:*

Response

### Ownership and control

40. The Applicant, Hampshire (NZ) Limited, is ultimately owned by Australian citizen Andrew Hoffman, as the sole shareholder of AZZ Pty Ltd. The Applicant and AZZ Pty Ltd are controlled by a board of directors, comprised of Andrew Hoffman and David Hoffman.
41. As with previous investments in New Zealand, the directors approved the acquisition of the holiday park and make key capital and operating expenditure decisions relating to the investment.
42. The day-to-day management of the holiday park will be coordinated by New Zealand head office staff.

## Relevant overseas person and individuals with control

Explain your rationale for the relevant overseas person and individual with control selection included in your online submission form:

Response

43. As per the previous application<sup>2</sup> and as per the correspondence with the OIO attached as **Appendix 7**, the Applicant submits that the relevant overseas person ("**ROP**") is collectively:
  - Hampshire (NZ) Limited, 100% owner of the SPV, Thornton Beach (NZ) Limited, that will acquire the leasehold interest and operate the Thornton Beach Holiday Park;
  - AZZ Pty Ltd, 100% owner of Hampshire (NZ) Limited; and

<sup>2</sup> OIO Assessment Report for 202300706, paragraph 2.

- Andrew David Hoffman (100% owner of AZZ Pty Ltd).

44. As per the previous application,<sup>3</sup> the individual with control (“**IWC**”) of the relevant overseas person is:

- David George Hoffman, Director of Hampshire (NZ) Limited and AZZ Pty Ltd.

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<sup>3</sup> OIO Assessment Report for 202300706, paragraph 2.

## Individuals with control

Complete for any individuals with control of the relevant overseas person that has **not** been part of a recent overseas investment application (past 5 years). If unsure, please provide information below. Please repeat the table for each individual.

|   |  |
|---|--|
| <b>Full name</b><br>(in English)  |  |
| <b>Is this individual a New Zealand citizen?</b> (if yes then skip to question iv below)  |  |
| <b>i) Has this individual ever applied for a visa to travel to NZ?</b>  |  |
| <b>ii) Is this individual ordinarily resident in NZ?</b><br>see <a href="#">here</a>  |  |
| <b>iii) CV</b><br><b>List jobs held and years held:</b><br><i>This helps us to ensure we have identified the correct individual when undertaking our due diligence.</i><br>eg Director of ABD Limited 1997-2014 |  |
| <b>iv) Has this individual ever held an interest in a non-New Zealand government entity?</b><br>If yes, how?  |  |
| <b>v) Has this individual ever held a position in a non-New Zealand government investor?</b><br>If yes, what?   |  |
| <b>vi) Has this individual ever held a position in an intelligence agency or served in the military</b><br>If yes, what?  |  |

## Attachments

Upload the following using the application submission webform:

- Full structure diagram(s) showing ultimate ownership and control and if the transaction is complex pre & post transaction diagrams. To confirm if the investment involves a 'non-NZ government investor', the structure diagrams should indicate any 'relevant government investors', including their percentage ownership and control interests (undiluted) and jurisdictions.

## Section 3: Investor Test

Have any of the relevant overseas person and/or individuals with control established any factors under [section 18A of the Act](#)?

*If so, please detail who established the factor, how the factor was established and any mitigating steps taken.*

*If you have told us about this factor in a previous application, please note this referencing the relevant case number (you do not need to provide the detail again). See here for guidance on the investor test.*

### Response

45. The Applicant confirms the relevant overseas person and individuals with control have **not** established any factors under section 18A of the Act.

### Attachments

*If an explanation of the factor established requires the provision of documents (such as a copy of an enforceable undertaking) please upload using the application submission webform. Please upload all documentation in English, including copies of any decisions noted above*

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## Section 4: National Interest

A [national interest](#) assessment applies to transactions requiring consent under the Act.

Transactions subject to mandatory national interest assessments involve:

- land or assets used for strategically important business, including [critical direct suppliers](#) and those involved in military or dual-use technology, ports or airports, electricity, water, telecommunications, and financial market infrastructure<sup>4</sup>; or
- certain levels of investment made by or associated with a foreign government.

Ministers also have a discretion to call-in consent applications for a national interest assessment even if they don't trigger the requirement for a mandatory national interest assessment<sup>6</sup>.

Explain whether the transaction involves a [non-NZ government investor](#)<sup>7</sup>.

*Include information about the direct and indirect ownership and control of the Applicant and whether any persons in the upstream ownership structure mean the Applicant is a non-NZ government investor (considering each entity in the ownership structure chart). Please note the full name of the non-NZ government investor, the country of origin and the percentage held.*

*The structure chart provided with the application should highlight any relevant non-NZ government investors, including their percentage ownership interests (undiluted) and jurisdiction. If there's a large number of entities, lists or charts may be used instead, or as supplements to the structure charts.*

*Note that an entity is a non-NZ government investor if relevant government investors have aggregate ownership interests of more than 25% in it. This does not dilute. So, to determine if the investor is a non-NZ government investor, the question is whether the entities immediately above it in the chain include relevant government investors and, if so, whether their ownership or control interests in it aggregate to more than 25%.*

*If there are a large number of non-NZ government investors, lists or charts may be used as supplements to the ownership structure chart.*

### Response

46. The transaction does not involve a non-NZ government investor because no foreign government investor has or will have any interest in the Applicant, or its shareholding company, AZZ Pty Ltd. The Applicant is ultimately owned by an individual, Andrew Hoffman.

<sup>4</sup> Under section 20A(1)(c) to (e) of the Act

<sup>5</sup> See sections 20A(1)(a) and (b) and the definitions of 'non-NZ government investor', 'relevant government investor' and 'relevant government enterprise' in section 6 of the Act

<sup>6</sup> For more information see our [website](#), the [Supplementary Ministerial Directive Letter dated 24 November 2021](#) and [Treasury's Foreign Investment Policy and National Interest Guidance 8 June 2021](#)

<sup>7</sup> Under section 20A(1)(a)-(b) of the Act

Explain whether the transaction involves a [strategically important business](#)<sup>8</sup>.

Response

47. The proposed acquisition of the leasehold interest in the Land does not involve a strategically important business as defined in section 6 of the Act. The transaction will have nothing to do with military technology, critical direct suppliers, dual-use technology or any other activity listed as strategically important business.

Explain whether the transaction engages one of the scenarios outlined in the Annex of the [2021 directive letter from the Minister of Finance](#) and therefore could be a transaction of national interest under [Section 20B of the Act](#)? If the Applicant considers the transaction is not a transaction of national interest under section 20B of the Act, provide submissions on why not:

Response

48. The Applicant submits that the transaction is not of national interest because it does not engage any of the scenarios outlined in the Annex of the 2021 Directive Letter from the Minister of Finance.

*National security/public order*

49. Specifically, the transaction does not pose risks to New Zealand's national security or public order – the Investment merely involves the acquisition of a leasehold interest where an existing holiday park operates.

*Competition effects*

50. The proposed transaction will not give the Applicant any degree of market power. As noted in the OIO's Assessment Report for the previous application relating to the Kaikoura Holiday Park, the Applicant's previous investments account for [REDACTED] market share of the New Zealand registered holiday park sector, as at 5 October 2023.<sup>9</sup>

*Foreign Government ownership*

51. The beneficial ownership of the Applicant does not include any foreign government or agency.

<sup>8</sup> Under section 20A(1)(c)-(e) of the Act

<sup>9</sup> OIO Assessment Report for 202300706, paragraph 20.



*Inconsistent with Government objectives*

52. The Applicant is unaware of any Government objective that is compromised as a result of this acquisition proceeding. By making an application for consent, the Applicant is following the correct procedure.

*Treaty of Waitangi issues*

53. As confirmed in the Sensitive Land Certificate, there is no wahi tapu or wahi tapu areas, Maori reservation or any other features on the land that would likely be of significance to Maori.

*National significance*

54. Furthermore, the Sensitive Land Certificate has not identified any historic heritage sensitivities or archaeological sites recorded against the Land.

Has the Applicant been granted an exemption under [section 20AA of the Act](#)? If yes note the case number.

Response

55. No, the Applicant has not been granted an exemption under section 20AA of the Act.

**Attachments**

*Upload documentation relating to National Interest matters (e.g. structure chart to demonstrate whether or not applicant is a non-NZ government investor).*

## Section 5: Land

### Non-sensitive land

Is any land being acquired that is not sensitive? If yes, please provide a brief description of the non-sensitive land below using addresses and record of title numbers where possible.

*LINZ may request further information (including a [sensitive land certificate](#)) in respect of any non-sensitive land which is described in the application. If there are a large number of non-sensitive titles involved, then a general description of the land may be acceptable (for example "150 hectares of non-sensitive commercial zoned land in Auckland City", or "twenty-five retail stores located in the lower South Island").*

#### Response

56. Not applicable. The relevant Land is classified as "sensitive land" as per the Sensitive Land Certificate attached as **Appendix 6**.

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## Attachment 1: Privacy and information sharing notice

We collect information to decide whether you are eligible, and to monitor your compliance with conditions of consent.

Toitū Te Whenua Land Information New Zealand (**LINZ**) collects information about you on this form to:

- decide whether you are eligible for LINZ consent to invest in sensitive New Zealand assets, and
- monitor that conditions are met if we grant consent.

We are authorised to collect this information under the Overseas Investment Act 2005.

### We can share your information for some purposes

We may share information about you as part of:

- Administering, monitoring and enforcing the Overseas Investment Act 2005.
- Meeting information-sharing agreements we have with some New Zealand government agencies. For example, we share information with the Ministry of Business, Innovation and Employment and the Department of Internal Affairs to verify passport and visa information and travel movements, and to monitor whether a person has become a New Zealand citizen.
- Sharing information to maintain the law, such as volunteering information to Inland Revenue, NZ Police, the Ministry of Business, Innovation and Employment, the Serious Fraud Office, and other law enforcement agencies.
- Consulting with relevant stakeholders as to your benefit claims and features of the investment, including central government organisations such as the Department of Conservation, Ministry of Business, Innovation and Employment, and Ministry of Primary Industries, Crown entities such as Ministry of Arts, Culture and Heritage and the NZ Transport Agency, and Crown agents such as the Walking Access Commission.

Applications for consent that you submit to LINZ are a public record. However, the Official Information Act 1982 and the Privacy Act 2020 have provisions that allow us to withhold information contained in an application. More information about the privacy and confidentiality of the information contained in an application can be found at [Privacy, confidentiality, and sharing of information](#).

### We keep your information secure

All relevant information about you is collected in line with the Overseas Investment Act 2005 and Privacy Act 2020 and is held securely by LINZ. Under the Privacy Act 2020, you may request this personal information and ask for any errors to be corrected.

You do not have to provide all the information requested in this form, but not doing so may make it difficult to process your request under the Overseas Investment Act 2005. Please [contact us](#) if you have any questions or concerns about the information in this form.