

Investment Plan

Benefit to New Zealand Test

Application for consent to acquire Sensitive land, or Sensitive land & Significant business assets

Use this template for all applications for consent under the benefit to New Zealand test, involving sensitive land and significant business assets.

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 Land Information New Zealand (LINZ).

LINZ 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 LINZ can easily identify those updates.
- You must upload the completed investment plan to your online application for consent before you submit the application.

Electronic Filing Requirements

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 appendix to your application (number and describe each attachment as follows: 'Attachment 01 – X')	<input checked="" type="checkbox"/>
3.	All PDF documents are:	<input checked="" type="checkbox"/>
	<ul style="list-style-type: none">'Printed to PDF', or scanned and OCR'd (i.e., all text in the document can be copied)Free from security restrictionsIn colour (if the document contains colour)If scanned, at 300 dpi (where possible)	

Version control

Record the details of each version of the investment plan below.

Applicant Name		Hampshire (NZ) Limited
Version	Date	Description
1.0	23 July 2025	First version submitted to OIO

Applicant signature – Version 1.0

Only version 1.0 and the final version of the investment plan must be signed.
Sign version 1.0 of the application below.

Version 1.0	
[Sign here]	Date [e.g., 01/01/25]
	23 July 2025
Andrew David Hoffman Director of Hampshire (NZ) Limited	Date

Application signature – Final version

Do not sign the final version of the investment plan below until LINZ requests you to.

[Sign here]	Date [e.g., 01/01/25]
Andrew David Hoffman Director of Hampshire (NZ) Limited	Date

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

Released under the Official Information Act 1982



Section 1: Land

Use this section to address criteria relating to farm land, farm land advertising, the farm land benefit test and residential land.

Response

Background to Thornton Beach Holiday Park

1. As explained in the Application Form, the Applicant (via its recently established wholly owned subsidiary, Thornton Beach (NZ) Limited) wishes to acquire a leasehold interest in approximately 7.9950 hectares of land located at the Thornton Beach Holiday Park, 163 Thornton Beach Road, Thornton, Whakatane ("the Land").
2. LINZ accredited supplier Schwarz Consultancy Limited ("SCL") prepared the Sensitive Land Certificate dated 14 April 2025. A copy of the Sensitive Land Certificate is attached as Appendix 6.
3. Included in the Sensitive Land Certificate are the following documents:
 - Landonline spatial map;
 - aerial photographs;
 - locality map;
 - Whakatane District Plan and other relevant documentation; and
 - Records of Title 1010274 (fee simple) and 1170110 (leasehold) (including Historical search copies).
4. SCL has confirmed in the Sensitive Land Certificate that the Land is "sensitive land" as it is "non-urban land" that exceeds the area threshold of 5 hectares. There are no other sensitivities.
5. As explained in the Application Form, the Land is owned by Whakatane District Council (lessor) and is a recreation reserve, subject to the Reserves Act 1997. 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.

No fresh or seawater areas

6. In addition, SCL has confirmed in the covering letter that the Land does not include land deemed "fresh or seawater areas" as defined by section 3 of the Overseas Investment

Regulations 2005, being foreshore, seabed, riverbed or lakebed as defined in section 6(1) of the Overseas Investment Act 2005 ("Act").

No historic heritage or wahi tapu, and no Maori reservation land

7. Furthermore, SCL has confirmed in the covering letter that there is no historic heritage or wahi tapu listed in the New Zealand Heritage List and no Maori reservation land of any area threshold located within the Land.

No archaeological sites

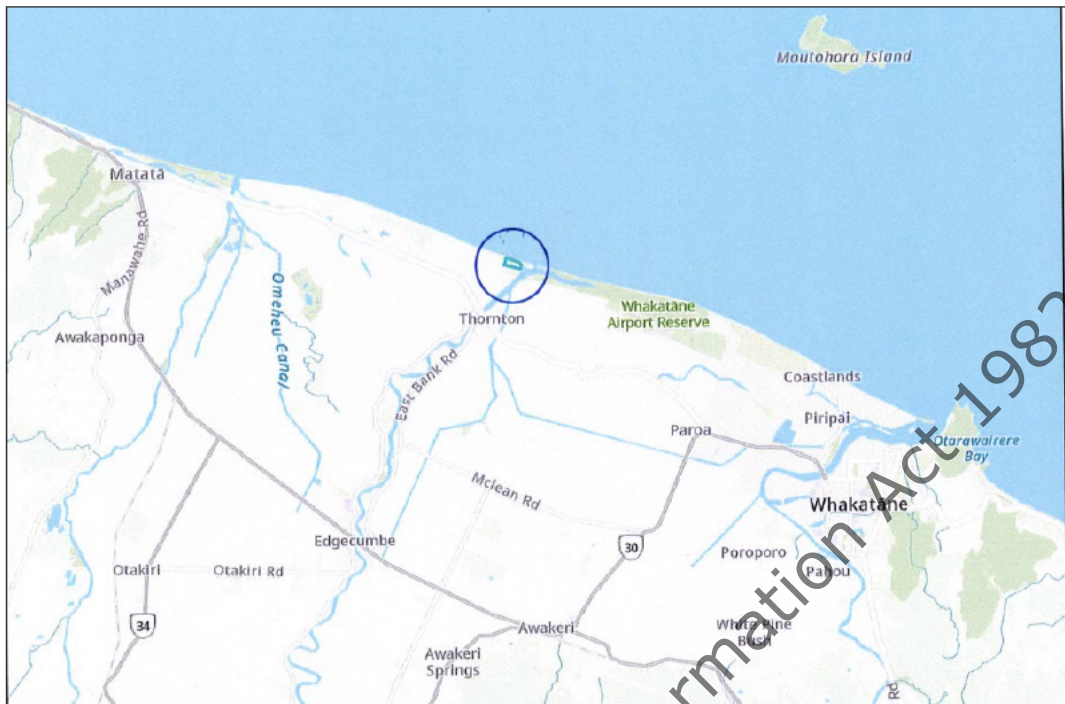
8. SCL has also checked the New Zealand Archaeological website and there is no record of any archaeological sites recorded against the Land.

Legal description

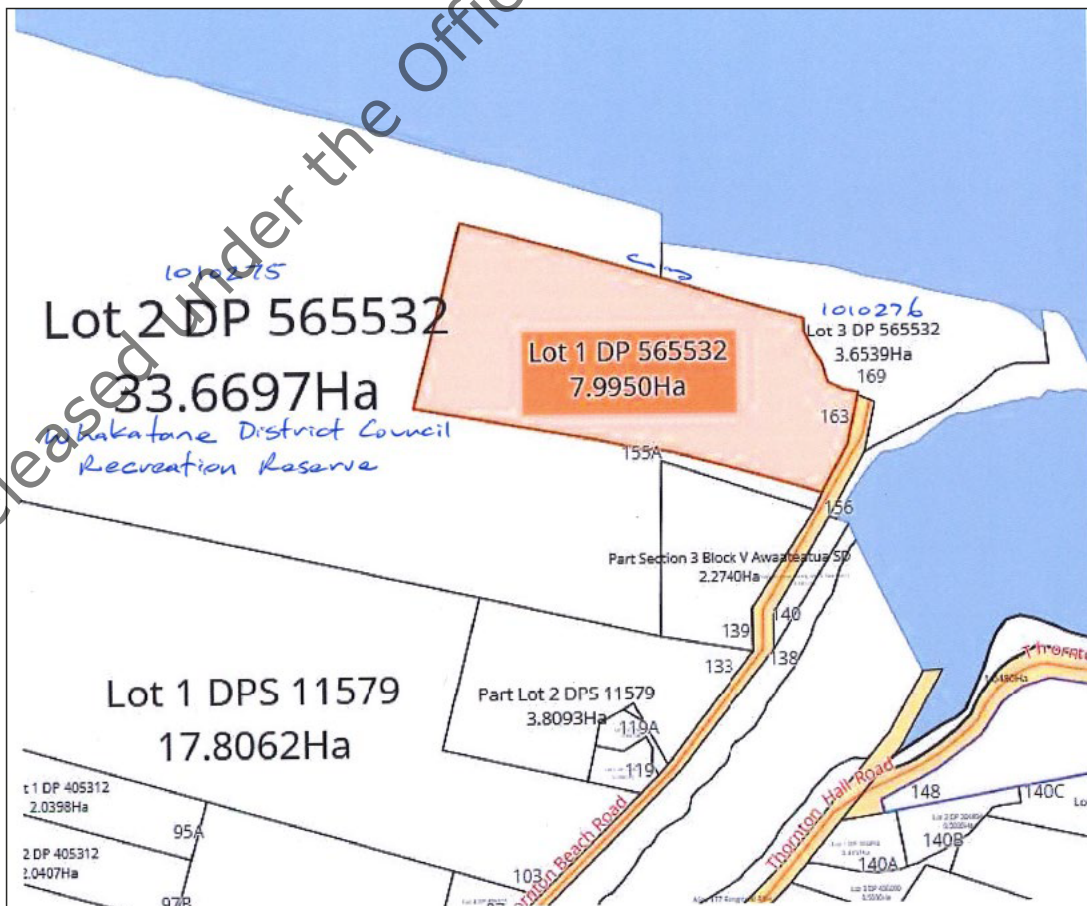
9. The legal description for the Land is shown below.

REF	RT Number	Legal Description	Land District	Non-Urban Land?	District Plan Zoning	Area
(a)	1010274 – fee simple 1170110 – leasehold	Lot 1 DP 565532	South Auckland	Yes	Part Special Purpose Coastal Protection Zone and part Special Rural Coastal Zone in the Whakatane District Plan	7.9950 ha
TOTAL LAND AREA						7.9950 ha

10. The locality map shown below sets out the location of the Land in Thornton, Whakatane, in the Bay of Plenty region.



11. The spatial map shown below highlights the Land in orange. A copy of the spatial map is included in the Sensitive Land Certificate attached as Appendix 6.



12. The aerial photograph shown below outlines the Land in green. A copy of the photograph is included in the Sensitive Land Certificate attached as Appendix 6.



Farm land

Is the relevant land farm land (refer section 6 and LINZ [guidance](#))?

Required content:

Provide reason(s) why the relevant land is or is not farm land.

Response

13. The Applicant confirms that the Land is not classified as "farm land" as it is not used exclusively or principally for agricultural, horticultural or pastoral purposes or for the keeping of bees, poultry or livestock. The relevant land is used solely as a holiday park/camping ground.

Farm land advertising

If yes, has the farm land or interests in farm land been offered for acquisition on the open market to persons who are not overseas persons in accordance with the procedure set out in regulations (refer section 16(1)(f), regs 4-11 and LINZ [guidance](#))?

Required content:

Provide the following:

- Provide evidence of the advertising undertaken and how it met the requirements under the Regulations.
- Only provide further explanation of how the advertising met the Regulations in this document where the evidence provided above does not do so.
- If you have applied for a farm land advertising exemption under section 20(1)(a), please confirm this below and provide the required details in the relevant section of the online Application Submission form.

Note - the advertising period of 30 working days (as set out in regulation 9) is calculated with the date of the advertisement equalling day '0'.

Required attachments to be uploaded:

A copy of, and links to, the advertisements as published, including newspaper or real estate listing. All mediums of advertising must show the listing date and include any price reductions over the course of the advertising.

Response

14. Not applicable. The Land is not farm land.

Farm land benefit test

Does the [farm land benefit test](#) apply to this investment (refer section 16A(1C))?

Required content:

Submissions on why the farm land benefit test does, or does not, apply to this investment.

Please note if the land includes farm land that exceeds five hectares the farm land benefit test will be applied unless the investment clearly meets the criteria in section 16A(1D). If you consider your investment meets one of the criteria in section 16A(1D)(a)-(c), please clearly detail which applies and why.

If applicable, submissions on how the farm land benefit test is met should be included in [Section 4: Farm Land Benefit Test](#).

Response

15. Not applicable, as the Land is not farm land.

Residential land

If the land is, or includes, residential land then the decision-maker must determine which residential land outcome(s) in clause 19 of Schedule 2 of the Act apply to the residential land and be satisfied that the mandatory conditions associated with the relevant outcome(s) will or are likely to be met.

Is the relevant land, or does it include residential land?

Required content:

Confirm whether the land is or includes residential land and, if so, identify the location of the residential land and describe it.

Required attachments to be uploaded:

An aerial photo clearly identifying residential land (or refer to the same if already provided elsewhere).

Response

16. The Land does not include land classified as "residential land" as per the Sensitive Land Certificate attached as **Appendix 6**.

If yes, what residential land outcome(s) do you propose for the residential land?

Required Content:

Provide the following:

- Confirm the residential land outcomes you propose for the residential land. If you propose more than one, clearly identify the land each proposed outcome relates to.
- Explain how you will meet the relevant outcome(s), including information about your plans and timeframes.
- Comments (if any) about the conditions we must impose in relation to the relevant residential land outcomes.

Response

17. Not applicable. As explained above, the Land does not include residential land.

Section 2: Investment plan

Current state

Describe what the current owner has been, and is currently, doing with the relevant assets - this is your understanding of the situation. This information should be set out first as it provides the necessary background and context for your investment story and helps us assess the current state (counterfactual) of the investment as set out in section 16A(1A)(a).

Information in this section should generally include details of the current owner's business operations including the current condition of the relevant assets, productivity information, measures in place to protect the natural environment, historic heritage or public access and relevant background information. Be clear where this information has come from (e.g., discussions with the vendor / lessor, due diligence).

Note: We may request further specific information about the current state for each benefit claim you set out later.

Avoid duplicating information.

Response

Current use and condition of the Land

18. The Land has been operated as a holiday park for over 50 years. The Land is currently leased by Thornton Beach Holiday Park (2015) Limited, a New Zealand company owned by Louise and Roger Dallas, who have operated the holiday park for the past 10 years. A link to the website: <https://www.thorntonbeach.co.nz/> and a photograph is set out below.



19. The holiday park includes the following accommodation as set out in the photographs below.

- two standard cabins that each sleep 4 people;
- five tourists flats that each sleep 6 people;
- two park motel units that each sleep 5 people; and
- 90 powered camping sites and 86 unpowered camping sites.



20. The above cabins, tourist flats and motel units are described by some guests as in poor condition, run down and in desperate need of renovation.¹ No linen is provided in the cabins.

21. The camping facilities include two amenity blocks, a communal kitchen, laundry facilities, children's playground and jumping pillow. The Applicant considers the communal kitchen and laundry are in good condition. The playground requires expansion and modernisation and the jumping pillow is in good condition.

¹ Refer to reviews on booking.com at <https://www.booking.com/reviews/nz/hotel/thornton-beach-holiday-park.en-gb.html>.

22. There is also a manager's three bedroom house that incorporates the reception area and a one bedroom self-contained flat that is not currently used.
23. In addition, the Land contains 32 baches that are tenant owned and occupied via a licence.
24. As explained in the Vendor Information Form ("VIF"), there are currently three employees consisting of 2.5 full time equivalents ("FTEs"):
- Manager (current owner operator) - 1 FTE;
 - Groundsman - 1 FTE;
 - Housekeeping - 0.5 FTE.
25. There are also three casual seasonal employees hired from December until the end of Easter each year for the busier summer holiday period which is equivalent to 0.5 FTEs.
26. As per the VIF, the total sales generated over the past three years at the holiday park are as follows:

Year ending	30 March 2024	30 March 2023	30 March 2022
Total sales	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]

27. In terms of capital developments, as confirmed in the VIF, the Vendor has no planned developments.
28. For completeness, it is noted that there is an existing resource consent to expand the holiday park by a further 235 sites, including allowing 29 relocatable homes, however, the Vendor has no plans to expand the park, as confirmed in the VIF.

Special features

29. There are no fresh or seawater areas as confirmed in the Sensitive Land Certificate attached as **Appendix 6**. There is a Dune Management Area containing dunes and native plants as discussed further below.

30. The Sensitive Land Certificate has also confirmed that there is no historical heritage or wahi tapū listed in the NZ Heritage List, and no Māori reservation land is included in the property. Nor are there any recorded archaeological sites. This information is confirmed by the Vendor.

Vendor's reasons for selling

31. As explained in the VIF, the reason for selling is [s 9(2)(a)]. The leasehold business was advertised for sale as per the advertisement below. Following the advertising, only one offer was received and that was from the Applicant.


Thornton Beach Holiday Park
Leasehold Business

Situated on beautiful Thornton Beach & close to the mouth of the Rangitaiki River on the North Island

- There's potential to develop another 113 sites incl 29 homes
- Provides: 90 pwd camp sites, 9 self contained motel type units, 86 camp sites, 2 ablution blocks, self contained flat
- 32 baches/houses on an occupational licence
- Facilities include playground, camp kitchen, bbq area, recreation room, kiosk, fish cleaning area and more



Price: 4,950,000.00

Phone: Jason Smith 022 1990 264 or Dale Wood 022 0800 566

Dale Wood +61 (0) 22 080 0566 E: info@hpbnz.com
www.hpbnz.com

Investment

Describe what you plan to do with the investment - this is the story of your investment. It should be clear to us what you plan to do with the assets (including key commitments and how long you intend to hold the investment) and why.

Your specific benefit claims are set out later but are expected to flow from this narrative. This will reduce the amount of background information required within each benefit claim.

Avoid duplicating information.

Response

Applicant's plans for the Land

32. As explained in the Application Form, the Applicant's holding company is an experienced holiday park operator with over 80 holiday parks in Australia. In addition, the Applicant's wholly owned subsidiary, Hampshire Holiday Parks Limited, currently operates 7 holiday parks in New Zealand.
33. The Applicant has a proven track record in developing holiday parks in New Zealand to a high standard, as explained in the Application Form. The Applicant has prepared a development plan for the Thornton Beach Holiday Park that will result in more visibility, higher bookings and an improved guest experience. A copy of the Applicant's Capital Development Plan for Thornton Beach Holiday Park is attached as **Appendix 16**.
34. As explained further below, the Applicant's developments include investing over [s 9(2)(b)(ii)] within the first three years in the holiday park's infrastructure as follows:

■ [s 9(2)(b)(ii)]

■ [REDACTED]

■ [REDACTED]

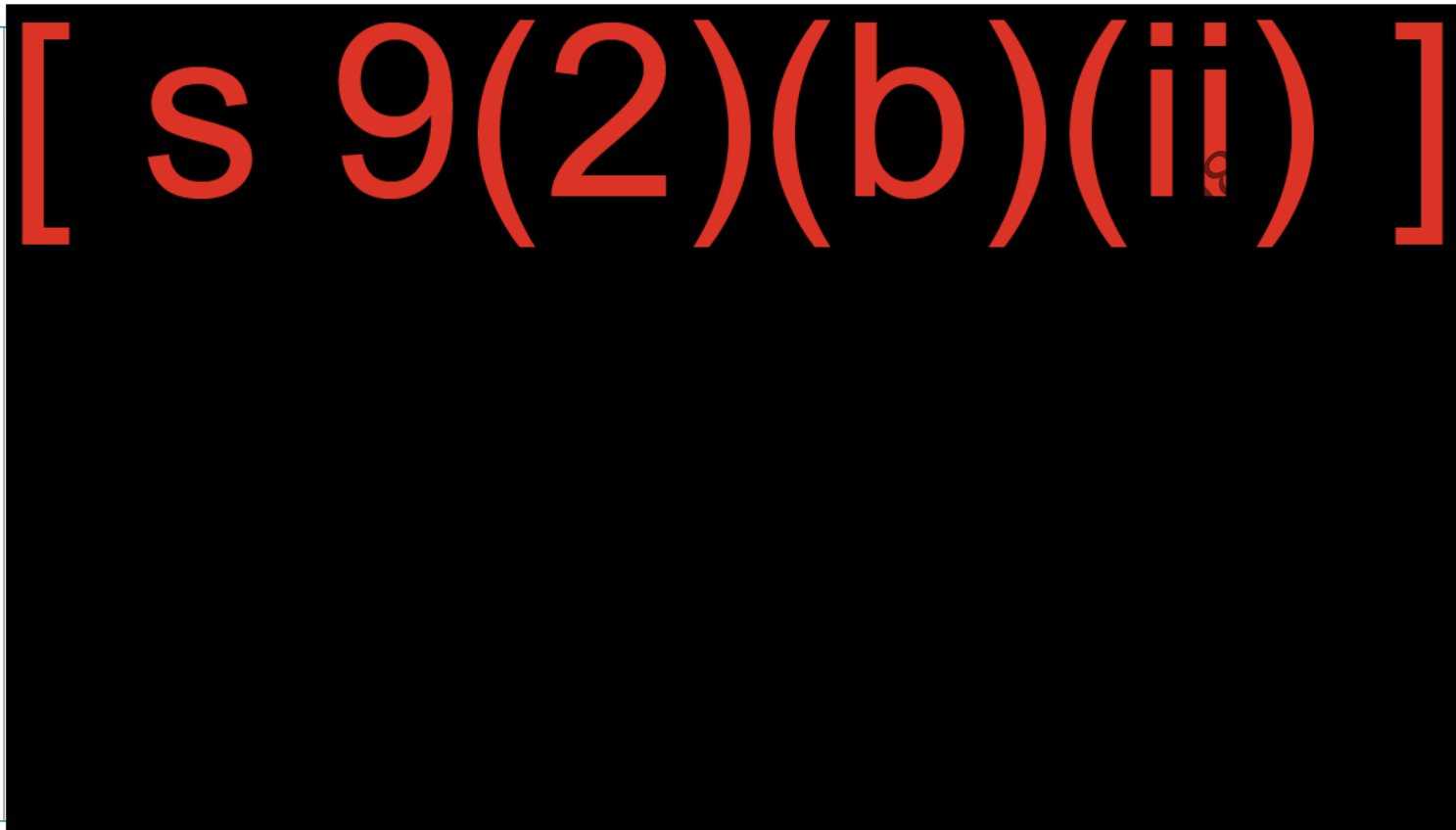
■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

35. A map showing the approximate location of the [s 9(2)(b)(ii)] [s 9(2)(b)(ii)] set out below. A copy of the map below is included in Appendix 16.



36. The Applicant will engage local contractors (builders, architects, engineers etc) to undertake the above developments. In addition, as explained below, the Applicant will create new jobs to support the growth in occupancy and service levels at the holiday park.

37. [s 9(2)(b)(ii)] [s 9(2)(b)(ii)]

[s 9(2)(b)(ii)] the Applicant has focused on the above development plans which will result in increased capacity, a higher standard holiday park, new jobs and increased revenue.

Thornton Beach Holiday Park, 163 Thornton Road, Thornton, Whakatane		
Land use	Current (ha)	Proposed (ha)
Holiday Park (Recreation Reserve)	7.9950	7.9950
Total	7.9950	7.9950

Section 3: Benefit claims

Address the benefits that are likely to flow from the investment. Identify and focus on the key benefits of the investment – not all benefit factors will be relevant or need to be satisfied however if the investment includes farm land, you will need to show a substantial benefit under the economic factor and/or the New Zealand participation factor.

Only make a claim where:

- A factor is relevant to the investment (if the factor isn't, then state 'not relevant');
- You can satisfy the key elements of the factor;
- The applicant is prepared to deliver that benefit (benefit claims will be subject to conditions and post consent monitoring); and
- The benefit is additional to any benefit present under the current state.

Making a claim

When making a claim:

- Clearly explain the initiative, include details such as the size and scale and how it will result in benefit to New Zealand.
- Be specific and where possible quantify the benefit – provide relevant figures and timeframes. Provide well researched claims (use a range if a specific figure cannot be provided and explain why).
- Address each key element of the relevant factor.
- Be concise and write in plain English (use headings and tables where appropriate and explain industry specific terminology).
- Identify whether the plan/benefit is contingent on another event and the timing of that event (e.g., obtaining resource consent).
- Be clear about what you are willing to commit to doing and have as conditions of consent.
- Avoid duplicating information.

Address the extent to which the claimed benefit is additional to any benefit present under the current state and why.

When claiming a benefit, you must also describe any directly comparable negative impacts likely to result from your investment (e.g., if you are claiming an increase in jobs as a benefit, also state if any jobs will be lost in other areas). See [here](#) for more information on the benefit to New Zealand test.

Economic Factor

Will the overseas investment result in, or is it likely to result in, economic benefits to New Zealand (refer section 17(1)(a))?

Examples may include:

- The creation or retention of jobs
- The introduction of technology or business skill
- An increase in productivity or export receipts
- A reduced risk of illiquid assets

Clearly outline the exact economic benefit arising from your claims and clearly set out the claims with defined headings if you wish to address multiple economic benefits.

If the investment includes farm land, this factor is deemed to be of high relative importance (refer section 16A(1C)(a)).

Response

38. The Applicant submits that the Investment will result in the following economic benefits to New Zealand, and therefore, this factor is met:
- a) capital development;
 - b) creation of new jobs and employee benefits; and
 - c) increased revenue from higher occupancy.
39. Each of the above are discussed in further detail below.

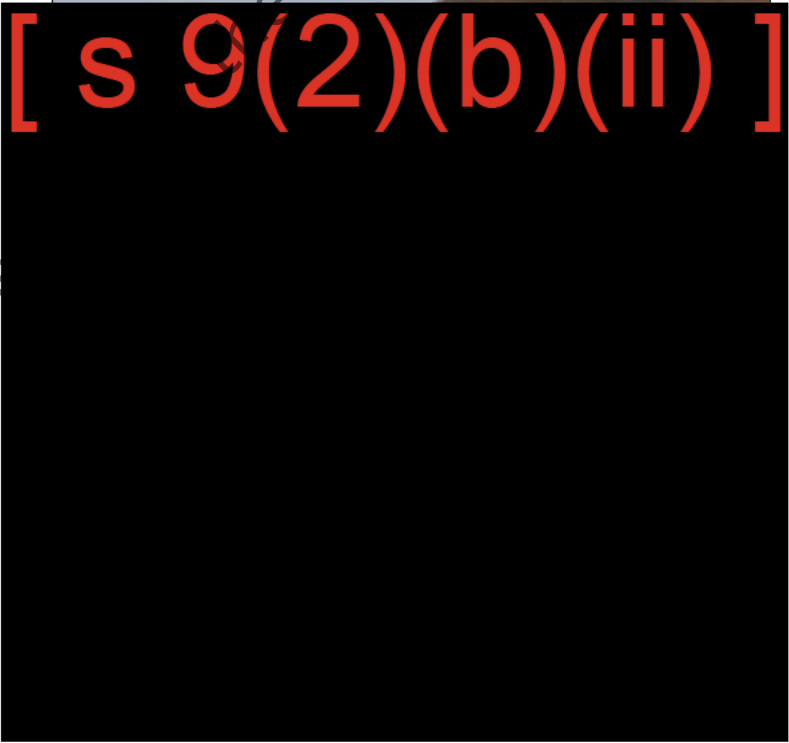
Capital development

40. As explained above, the Applicant will undertake a capital development plan at the Thornton Beach Holiday Park investing over [s 9(2)(b)(ii)] as set out in the table below and included in Appendix 16.

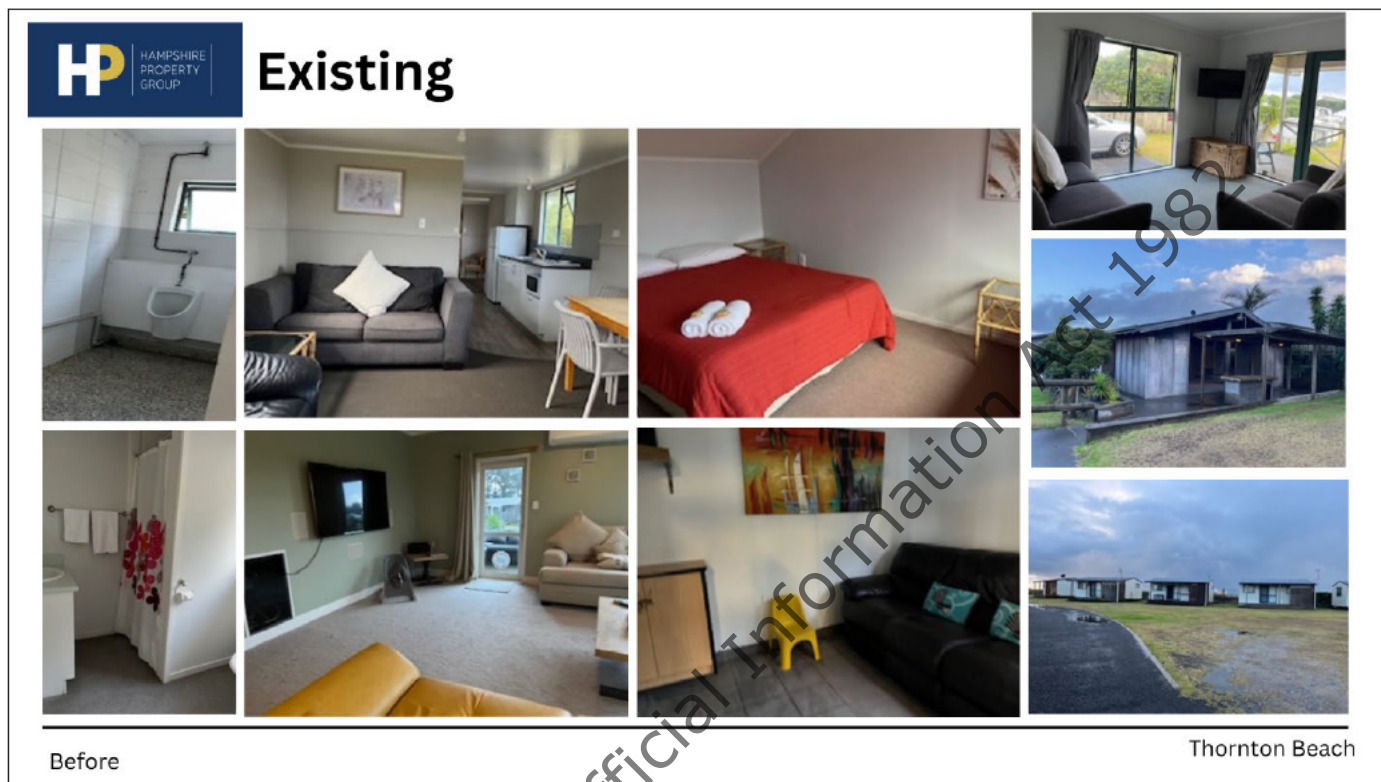
Location	Item	Amount (\$)
Thornton Beach	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]
	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]
	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]
	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]
	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]
	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]
	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]
	[s 9(2)(b)(ii)]	[s 9(2)(b)(ii)]

41. The [s 9(2)(b)(ii)] will be located near [s 9(2)(b)(ii)], as set out in the Masterplan Concept Map above. The development costs for the [s 9(2)(b)(ii)] are approximately [s 9(2)(b)(ii)]. Photograph of the concepts for the new cabins are as follows and included in Appendix 16.

[s 9(2)(b)(ii)]



42. In addition, the existing cabin, tourist flats and motel units will be upgraded. The following photographs show the existing poor condition of the facilities and the future improvements.



[s 9(2)(b)(ii)]

43. As set out on page 9 of the Capital Development Plan attached as **Appendix 16**, the concepts for the [s 9(2)(b)(ii)] are set out as follows.

[s 9(2)(b)(ii)]

44. The Applicant submits that with the additional capacity from the [s 9(2)(b)(ii)] quality of the facilities and guest experience, the holiday park will attract more guests and therefore increase occupancy rates and revenue.

Current state

45. The Vendor has no capital upgrades planned, as confirmed in the VIF. Therefore, the above developments would not occur without the investment. Given the current poor state of the holiday park, the Vendor has not undertaken any capex developments for a long time. Only general repairs and maintenance have been undertaken at a cost of [s 9(2)(b)(ii)] in 2024 and [s 9(2)(b)(ii)] in 2023.

Timeframe

46. The Applicant will commence the above developments within [s 9(2)(b)(i)] of settling the transaction and will be completed within three years, by [s 9(2)(b)(ii)].

Uncertainties

47. The Applicant submits that the OIO can be confident that the above developments will occur given Hampshire Property Group's proven track record of upgrading their existing holiday parks in New Zealand and their track-record in owning and operating caravan parks in Australia, as acknowledged by the OIO in Assessment Report 202200538.²
48. Any resource and building consents for the developments will likely be obtained. Clause 11 of the Lease requires the lessor's (Whakatane District Council) consent to erect any buildings or effect any capital improvements. The Applicant is confident that such consent will be obtained

Conclusion

49. The Applicant submits that the above capital developments of [s 9(2)(b)(ii)] is an economic benefit of a significant size that should receive a **strong** weighting. The funds will be spent domestically and regionally for goods and services that are necessary to undertake the developments.

Creation of new jobs and employee benefits

50. The Applicant will create the following new jobs at Thornton Beach Holiday Park:
- 1 new FTE receptionist/guest services role with an approximate salary of [s 9(2)(b)(ii)]
 - 0.5 new FTE ongoing housekeeping role with a minimum of [s 9(2)(b)(ii)] per week at an hourly rate of approximately [s 9(2)(b)(i)] and
 - additional seasonal housing keeping, receptionist and shop attendant, which will consist of approximately 4 workers at [s 9(2)(b)(ii)] per week during the summer holiday period, which is equivalent to 0.5 FTE and will be paid an hourly rate of [s 9(2)(b)(i)]

² OIO Assessment Report Case 202200538, paragraph 61.

51. The following table compares the current FTEs generated by the Vendor against the Applicant's proposed jobs following the upgrades of the holiday park. As can be seen in the table below, the investment will result in an additional 2 FTEs at the holiday park.

Role	Current (Vendor)	Proposed (Applicant)	Net increase
Manager	1 FTE	1 FTE	0
Receptionist/guest service	0 FTE	1 FTE	1
Grounds and maintenance	1 FTE	1 FTE	0
Housekeeping	0.5 FTE	1 FTE	0.5
Seasonal workers (December to Easter)	0.5 FTE	1 FTE	0.5
Total:	3 FTE	5 FTE	2 FTE

52. In addition, similar to the Applicant's most recent previous application regarding a holiday park in Kaikoura, the Applicant will provide all staff with the following benefits:

- 50% staff discount for accommodation at its other holiday parks across New Zealand;
- flexible working arrangements; and
- access to an Employee Assistance Programme, an independent counselling service.

53. As noted in the OIO's Assessment Report for Case 202300706, the above employee benefits are likely to improve employee value proposition and therefore an economic benefit to New Zealand.³

³ OIO Assessment Report 202300706, paragraph 47.

Timeframe

54. The above new jobs will be created within the [s 9(2)(b)(ii)] of operation. The employee benefits will be available immediately following settlement.

Location

55. The above new direct jobs will be created in the Bay of Plenty region at Thornton Beach.

Uncertainties

56. As mentioned above, the Applicant is confident any resource/building consents will likely be obtained for the proposed capital investments. There are no other uncertainties regarding the new jobs. The Applicant is not aware of any uncertainties regarding the above employee benefits and will implement them immediately following settlement.

Conclusion

57. The Applicant submits that the creation of 2 new FTEs and new employee benefits is a **strong** benefit relative to the small staff size, which is similar to the OIO's weighting in the previous application (OIO Assessment Report 202300706).

Increased revenue

58. The Applicant submits that the investment will result in Thornton Beach Holiday Park generating increased revenue due to additional capacity with the [s 9(2)(b)(ii)], better [s 9(2)(b)(ii)], resulting in higher occupancy rates.
59. In addition, the Applicant and its holding company, AZZ Pty Ltd, has an extensive, established distribution network which markets the group's portfolio of leisure offerings to consumers.
60. The Applicant will undertake a marketing and revenue growth strategy which will result in more visibility and higher bookings. The strategy includes the following:

- [s 9(2)(b)(ii)]
[s 9(2)(b)(ii)]
- [s 9(2)(b)(ii)]

■ [s 9(2)(b)(ii)]

■ [REDACTED]
[REDACTED]

■ [REDACTED]

61. As set out in the VIF and noted above, the Vendor's last three years of total sales from Thornton Beach Holiday Park are set out as follows:

- Year ending 30 March 2024: [s 9(2)(b)(ii)];
- Year ending 30 March 2023: [s 9(2)(b)(ii)]; and
- Year ending 30 March 2022: [s 9(2)(b)(ii)].

62. The Applicant submits that the above marketing and growth strategy will result in at least over [s 9(2)(b)] increase in annual revenue generated at the Thornton Beach Holiday Park as set out in the following table.

	Current (Vendor) Year ending 30 March 2024	Proposed (Applicant) Year ending 30 March 2029	Net difference
Total sales	[s 9(2)(b)(ii)]	[REDACTED]	[REDACTED] [s 9(2)(b)] increase

Timing

63. The Applicant will implement the above marketing strategy within [s 9(2)(b)(ii)] following settlement. The Applicant expects the above increase in revenue will occur within [s 9(2)(b)(ii)] of settlement. This allows time for the developments to be completed and operational.

Current state

64. The Thornton Beach Holiday Park is currently owned and operated by an independent couple that do not own any other campground or holiday park facilities across the country and therefore do not have the Applicant's reach to customers or ability to have cross promotion across Australia or other New Zealand parks. As mentioned above, the Vendor has no development plans.

Uncertainties

65. As mentioned above, the Applicant is confident any resource/building consent will likely be obtained for the proposed capital investments and the Applicant is confident that the above marketing strategy and upgraded facilities will enhance the customer experience, resulting in increased occupancy and revenue.

Conclusion

66. In summary, the Applicant submits that the above net increase in annual revenue of [s 9(2)(b)(ii)] is a conservative assessment of the Applicant's ability and desire to continue to grow the business over the next four year period and beyond. The Applicant submits in the context of the business, a [s 9(2)(b)(ii)] increase in annual revenue should be allocated a **strong** weighting.

Environmental Factor

Will the overseas investment result in, or is it likely to result in, benefits to the natural environment (refer section 17(1)(b))?

Examples may include:

- Protection of indigenous flora and fauna
- Erosion control

For the environmental factor it will normally be insufficient to state 'not relevant' without further explanation. Potentially relevant areas must be identified even if no action is proposed.

Where possible please provide aerial photography of the relevant land. You can prevent further information requests by identifying areas of interest. E.g., if the land contains indigenous vegetation or fauna then identify these areas and explain how they are managed, protected, or identified under the current state.

Response

67. As noted in the Lease, there is a Dune Management Area located within the Land that consists of dune land with native vegetation.⁴
68. By way of background, this area was subject to a Dune Management Area Restoration Agreement signed between the current lessee, Thornton Bach Holiday Park Ltd, and Whakatane District Council dated 14 February 2013, attached as **Appendix 17**.
69. The Whakatane District Council have recently confirmed that all obligations under that agreement have been fulfilled and the time period in the agreement has expired. Following recent correspondence with the Council, they have asked whether the Applicant would be willing to provide the Council with continued access to the site for ongoing restoration and maintenance. The Applicant has confirmed with Council that is agreeable.
70. For completeness, the Applicant will also ensure all other obligations in the Lease are complied with, for example the requirement to keep the Land in a clean and tidy condition and free of gorse, broom, sweetbriar, noxious weeds or plants (clause 6 of the Lease).

⁴ Refer to the area marked "Dune Management Area" on page 16 and clause 28 of the Lease attached as Appendix 4.

Public Access

Will the overseas investment result in, or is it likely to result in, continued or enhanced access by the public, or any section of the public, within or over the sensitive land or features giving rise to the sensitivity (refer section 17(1)(c))?

Examples may include:

- Access for recreational purposes
- Access for undertaking stewardship of, or exercising kaitiakitanga of the natural environment or historic heritage

Please detail any proposed new or existing arrangements in relation to public access on the land and, where possible, provide aerial photos in relation to any proposed benefit.

Please be specific about the access to be provided including the purpose for which it is being provided such as walking, cycling, hunting, vehicle access.

Response

71. The Applicant submits that this factor is not relevant because the Land is already designated as recreational reserve under the Reserves Act. In addition, the Applicant is acquiring a leasehold interest and therefore has insufficient authority to provide further public access.
72. For completeness, as noted above, the Applicant will provide the Whakatane District Council with continued access to the Dune Management Area for any ongoing restoration and maintenance.

Historic Heritage

Will the overseas investment result in, or is it likely to result in, continued or enhanced protection of historic heritage in or on the relevant land (refer section 17(1)(d))?

Examples may include:

- Agreement to execute a heritage covenant (or comply with existing covenants)
- Agreement to support entry to wāhi tūpuna, wāhi tapu
- Agreement to support entry to wāhi tapu areas on the New Zealand Heritage List/Rārangi Kōrero
- Taking other actions under the Heritage New Zealand Pouhere Taonga Act 2014 to recognise or protect heritage values
- Agreement to land being set apart as a Māori reservation

Please detail any areas of historic heritage on the land regardless of whether a benefit is claimed and describe all existing arrangements in place.

Response

73. SCL has confirmed in the covering letter of the Sensitive Land Certificate that there is no historic heritage or wahi tapu listed in the New Zealand Heritage List and no Maori reservation land of any area threshold located within the Land.
74. SCL has also checked the New Zealand Archaeological website and there is no record of any archaeological sites recorded against the Land.

Government Policy

Will the overseas investment, or is it likely to, give effect to or advance a significant Government policy (refer section 17(1)(e))?

Please clearly identify the Government policy being relied on, where possible provide links to the relevant publicly available key documents you are relying on. Claims should give clear examples of how the relevant policy will be given effect to or advanced.

Response

75. The New Zealand–Aotearoa Government Tourism Strategy (“**Government Tourism Strategy**”) is for tourism growth to be productive, sustainable and inclusive. The Government Tourism Strategy recognises that the Covid-19 pandemic severely impeded tourism in New Zealand and the Government Tourism Strategy sets out a more deliberate and action role for government in tourism.
76. The Tourism Strategy focuses on five things. These are:
- Te Ohanga – The Economy;
 - Te Taiao – The Environment;
 - Nga Manuhiri O Te Ao, A Aotearoa Ano Hoki – International and Domestic Visitors;
 - Tatou O Aotearoa Me O Tatou Hapori – New Zealanders and our Communities; and
 - Nga Roha – Regions.

77. A copy of the Government Tourism Strategy can be found at the following link:
<https://www.mbie.govt.nz/immigration-and-tourism/tourism/new-zealand-aotearoa-government-tourism-strategy>
78. The Government Tourism Strategy states "an optimal tourism system will have all regions in New Zealand-Aotearoa able to grow their tourism industries in a way that enhances the overall wellbeing of their communities – economic, social and environmental."
79. The Applicant submits that the Applicant's investment in new capacity, upgrading and enhancing of the guest experience at the Thornton Beach Holiday Park will advance the Government Tourism Strategy through the creation of new jobs and increased occupancy which will benefit not only Thornton Beach Holiday Park but the wider region of Bay of Plenty.

Conclusion

80. The Applicant submits that the advancement of the Government Tourism Strategy should be given a **moderate** benefit weighting, as per the OIO's previous assessment regarding Hampshire Holiday Parks Limited's application for consent to acquire a holiday park in Kaikoura.⁵

⁵ OIO Assessment Report 202300706, paragraph 47.

Oversight and Participation by New Zealanders

Will the overseas investment result in, or is it likely to, involve oversight of, or participation in, the overseas investment or any relevant overseas person by persons who are not overseas persons (refer section 17(1)(f))?

This factor is relevant to all investments and is deemed to be of high relative importance for investments involving farm land (refer s16A(1C)(a)). If New Zealanders are unlikely to have any oversight of or participation in the investment or relevant overseas person, then your conclusion should state this.

Please note that under s16A(1A)(a) and s17(2)(b) of the Act the counterfactual applies to this factor.

Response

81. Not claimed as the Applicant is owned and controlled by Australian citizens. However, New Zealanders will be employed and engaged in managing the Thornton Beach Holiday Park on a day to day basis.

Consequential benefits

Will the overseas investment result in, or is it likely to result in, other consequential benefits to New Zealand (refer section 17(1)(g))?

Any benefits claimed under this factor should not duplicate any information set out above.

Response

82. Not applicable.

Extraction of water for bottling/human consumption

If the overseas investment involves the extraction of water for bottling or other extraction of water in bulk for human consumption; will the overseas investment, or is likely to, result in a negative impact on water quality or sustainability (refer section 17(3)(a))?

This factor will always be relevant if your investment involves the extraction of water for bottling, or other extraction of water in bulk for human consumption.

Where possible, provide expert reports evaluating the likely impacts of the investment on water quality or sustainability.

Response

83. Not applicable.

Section 4: Benefit to NZ

Will the overseas investment, or is it likely to, benefit New Zealand (or any part of it or group of New Zealanders) (refer section 16A(1)(a))?

Discuss the overall benefit to New Zealand and how it is proportionate to:

- a) the sensitivity of the land (for example, the importance to New Zealand of the purpose for which the land is used, the size and value of the land, any sensitive features associated with the land, and the level of interest that the public have in the land); and
- b) the nature of the overseas investment transaction (for example, the estate or interest being acquired, whether the estate or interest is temporary or permanent, and the degree of overseas ownership or control of the land or of the estate or interest in land).

Response

84. The Applicant submits that the overseas investment described in this application will benefit New Zealand in accordance with section 16A(1)(a) of the Act.

Summary of benefits

85. As described in the previous sections, the Applicant is committed to providing the following economic benefits:
- a. investing a significant capital expenditure of [s 9(2)(b)(ii)] to increase the capacity at the holiday park, improve quality of the facilities and guest experience resulting in Thornton Holiday Park being more attractive to guests and therefore increasing occupancy and revenue;
 - b. creating 2 new FTEs, including a new receptionist/guest services role, ongoing housekeeping and additional seasonal workers and providing employee benefits;
 - c. a net increase in annual revenue of [s 9(2)(b)(ii)] being a [s 9(2)(b)(ii)] increase in revenue at the holiday park due to increased occupancy; and
 - d. advancing the New Zealand-Aotearoa Government Tourism Strategy through the additional capacity, upgrading of facilities and increased employment and higher occupancy rates, benefiting the Bay of Plenty region.

Proportionality

86. The Applicant submits that the Land is no more than **low - medium** sensitivity for the following reasons:

- a. the Land is only sensitive because it exceeds 5 hectares of non-urban land;
- b. the Applicant is acquiring a leasehold interest and it will continue to use the land in accordance with the Lease with Whakatane District Council and the Reserves Act 1977;
- c. the holiday park is currently described as run down and in urgent need of an upgrade by guests;
- d. the land does not include any residential land;
- e. there are no archaeological, wahi tapu or historical sites on the land of any area size as confirmed in the covering letter for the Sensitive Land Certificate; and
- f. the land does not include any fresh or seawater areas.

Assessment

87. When taking into account the low-medium sensitivity weighting of the Land and the benefits summarised above, it is submitted that the overseas investment will benefit New Zealand.

Section 5: Farm Land Benefit Test

If applicable, explain how the investment will meet the [farm land benefit test](#) (refer section 16A(1C)). In particular, explain how the investment has demonstrated a benefit, in relation to one or more of the factors of high relative importance, that are of a size or nature that represent a substantial benefit to New Zealand.

Required content:

Submissions on how the investment meets the farm land benefit test.

Response

88. Not applicable.