21 May 2026

Stephanie Frame
Manager - Fast-track Operations
Ministry for the Environment
PO Box 10362
Wellington 6143

Dear Stephanie

Request for further information on the referral application of the Brick Bay Lodge Project under the Fast-track Approvals Act 2024

We refer to your letter dated 14 May 2026 to Richard Didsbury requesting further information in relation to the above application (FTAA-2603-1204).

The applicants are Christine and Richard Didsbury. Peter Hall Planning Limited is authorised to respond on the applicants' behalf as their agent.

We set out below the information you have requested and our response under each request or question. This response is supported by the information provided at **Attachments A to E** to this letter.

You have specified that the further information response is required to be received by 21 May 2026, 11.59PM. We can confirm that this response has been provided within that timeframe.

Project description and scope clarification

1. *Based on the information provided on the project scope (including involved/supporting/subsidiary activities) and project area - it is unclear whether the full scope of the project and the activities it involves have been included in the application. For example, there is reference to 45 accommodation suites/120 rooms as well as visitor accommodation (numbers being subject to change), helicopter activities, subdivision (no scheme plan) and existing development (buildings). Please provide further clarity on the actual scope of the project. This is required because the description/scope will be reflected in any notice of decision if the project is referred, and officials will assess any substantive application against the Minister's notice of decision to confirm alignment between substantive and referral applications in terms of scope and completeness.*

In response to this request, we have provided further information to confirm both the project area and the project scope.

<u>Project Area</u>

The project area is the approximately 62.5ha area of land shown on Figure 4 (section 3.5) of the report prepared by Peter Hall Planning Limited and provided with the referral application **(the Referral Application Report)**[1].

The project area is held in two titles as set out below[2]:

[1] Brick Bay Lodge Referral Application under section 13 of the Fast-track Approval Act 2024, report prepared by Peter Hall Planning Limited, 14 April 2026.

[2] These titles are provided at Appendix 3 to the Referral Application Report

- Title ID 838486 (55.4017ha more or less) legally described as Lot 1, 4 Deposited Plan 524869 and Lot 2 Deposited Plan 105559, owned by Richard Didsbury and Christine Didsbury, each having an equal ½ share; and
- Title ID 894427 (7.1205ha more or less) legally described as Lot 1 Deposited Plan 537534 owned by Brick Bay Trustee Limited. Richard Didsbury and Christine Didsbury are the two directors of Brick Bay Trustee Limited.

We have reproduced below Figure 4 from the Referral Application Report. This shows the boundaries of these two titles which comprise the project area in yellow.

Figure 4: Brick Bay Lodge Title Boundaries (Source: Auckland Council GeoMaps)

Project Scope

We have provided an updated project description at **Attachment A**. This project description provides further clarity and an accurate description of the project and the activities it involves.

As shown on the Master Plan, the lodge facilities will occupy the coastal side of the project area.

We confirm that the project involves a subdivision to provide the lodge with its own titles (both fee simple and unit titles), separate from the balance of the applicants' land with a new residential lot to be created also. We have amended the project description to include a description of this subdivision and confirm that it is one of the activities proposed.

For completeness, we provide at **Attachment B** to this letter a Preliminary Subdivision Scheme Plan showing the project area subdivided into the separate titles (proposed Lots 1, 2 and 3). This subdivision is entirely contained within the project area (ie it will be a subdivision of the two existing titles set out above).

With the proposed subdivision of the land, the Brick Bay Lodge will occupy a future Lot 1 (15.9ha). The Brick Bay Winery, sculpture trail, restaurant and venue, and associated parking and other facilities will occupy a future Lot 2 (45.2ha). A private residence will be constructed on a future Lot 3 (1.4ha). This private residence replaces the existing dwelling on the coastal side of the property which will be converted to lodge facilities.

As described in the updated project description at **Attachment A**, Lot 1 will be further subdivided as part of the project as a unit title subdivision to create principal units, accessory units and future development units around the lodge buildings, with the necessary easements over Lot 2 in favour of Lot 1 and other legal instruments to provide for the construction and operation of the lodge. These will include easements for access and services to both the public road and services, and wastewater disposal to land on Lot 2.

We have also made a minor correction to the Master Plan which was included with the Referral Application Report and submitted with the referral application. The updated Master Plan is provided at **Attachment C** to this letter[3]. Specifically, we have deleted from the Master Plan the red dashed line boundary separating the Brick Bay Lodge site from the balance land in the project area. This is to avoid any confusion in relation to future fee simple title boundaries, with those now more accurately shown on the Preliminary Subdivision Scheme Plan at **Attachment B**. The updated Master Plan provided at **Attachment C** is provided in substitution for the equivalent plan in the drawing set included in Appendix 1 to the Referral Application Report. The remainder of the drawings included in Appendix 1 remain as were lodged.

Project Area

2. *The records of title contain interests (restrictive covenants, easements, consent notices), however, it is not clear in the application information what these are for and whether they will impact timely delivery of the project.*

We include at **Attachment D** a schedule by project lawyers Glaister Keegan setting out all interests on the titles that comprise the Project Area, with a commentary describing each. The schedule confirms that none of these instruments will impact on the timely delivery of the project.

Anticipated and known adverse effects on the environment

3. *Regarding s13(4)(h) - please indicate whether all of the anticipated and known adverse effects on the environment have been included in the application and clarify the significance of those adverse effects (this reflects wording included in the Act by way of the Fast-track Approvals Amendment Act 2025).*

We can confirm that all anticipated and known adverse effects on the environment from the project have been included in the Referral Application Report, with the addition of the following which are described in the additional information set out in **Attachment E**:

- Construction, including earthworks.
- Wastewater Disposal
- Subdivision

We have also provided a description of the significance of those adverse effects at **Attachment E**.

[3] Cheshire Architects Master Plan dated 15-05-26 "Brick Bay Lodge"

4. ***Are there anticipated adverse effects on the identified wetlands? Specifically, is the project anticipated to trigger a prohibited activity status under the National Environmental Standards for Freshwater (NESFW)? Please note that triggering prohibited activity status under the NESFW does not in itself prevent a Fast-track application from progressing.***

The Ecology Memo by Viridis Environmental Consultants provided with the Referral Application Report describes that the site the proposed lodge will occupy contains freshwater features, including streams and a mapped wetland feature.

The Ecology Memo notes that this wetland feature is likely artificial and therefore not a natural inland wetland. Notwithstanding that it is likely an artificial feature, the project will seek however to avoid the reclamation or modification of this wetland.

It is possible also that stormwater from nearby lodge facilities may be discharged into this wetland feature or overland in a way that might enter the wetland. As set out in the Ecology Memo, any adverse effects on freshwater and wetlands will be addressed at the Substantive Application stage, with the effects management hierarchy applied as required.

The Ecology Memo sets out that a detailed wetland delineation has not been undertaken at this stage across the project area. Therefore, although the part of the site occupied by the proposed lodge is mainly sloping, elevated and in pasture, there is the remote possibility that there are further natural inland wetlands there, as they are defined in the Resource Management (National Environmental Standards for Freshwater) Regulations (**NES:F**) and the National Policy Statement for Freshwater Management. If so identified, there is then the possibility that earthworks or the taking, use, damming, or diversion of water associated with the project, may be required and be a prohibited activity under section 53 of the NES:F.

For this reason and out of an abundance of caution, we confirm a prohibited activity status for the project - specifically in respect to the activities set out in section 53 of the NES:F (should that be required).

5. ***Wastewater - based on the statement: Given the size and scale of the proposal Hutchinson recommend the engagement of a specialist firm in large scale onsite wastewater treatment plants to complete the necessary design and provide advice - Please indicate where and how this is intended to be achieved within the project area shown on the proposed masterplan?***

As described in **Attachment E**, project Civil Engineers Hutchinson have sought further advice from specialist wastewater engineering firm Innoflow on preliminary concepts for wastewater treatment and disposal to land within the project area, should that option be required.

Based on an assessment of wastewater demand from the lodge and a review of areas and slope of the land, the majority of the land disposal areas will be able to be accommodated within the proposed future Lot 1 below), with some (including the reserve area) accommodated in the future Lot 2. Easements will be in place with the subdivision for this purpose. In any event however, the full wastewater treatment and disposal system will be able to be accommodated within the project area.

We trust the above and attached provides sufficient information in response to your questions. I am available for any further clarification as required.

Yours sincerely

Peter Hall BPlan, MNZPI
Director | Peter Hall Planning Limited

cc (by email): Stephanie McNicholl, Senior Advisor Fast-track Operations

Max Ganer-Cooper, Principal Advisor Fast-track Operations

PETER HALL
PLANNING LIMITED

Attachment A

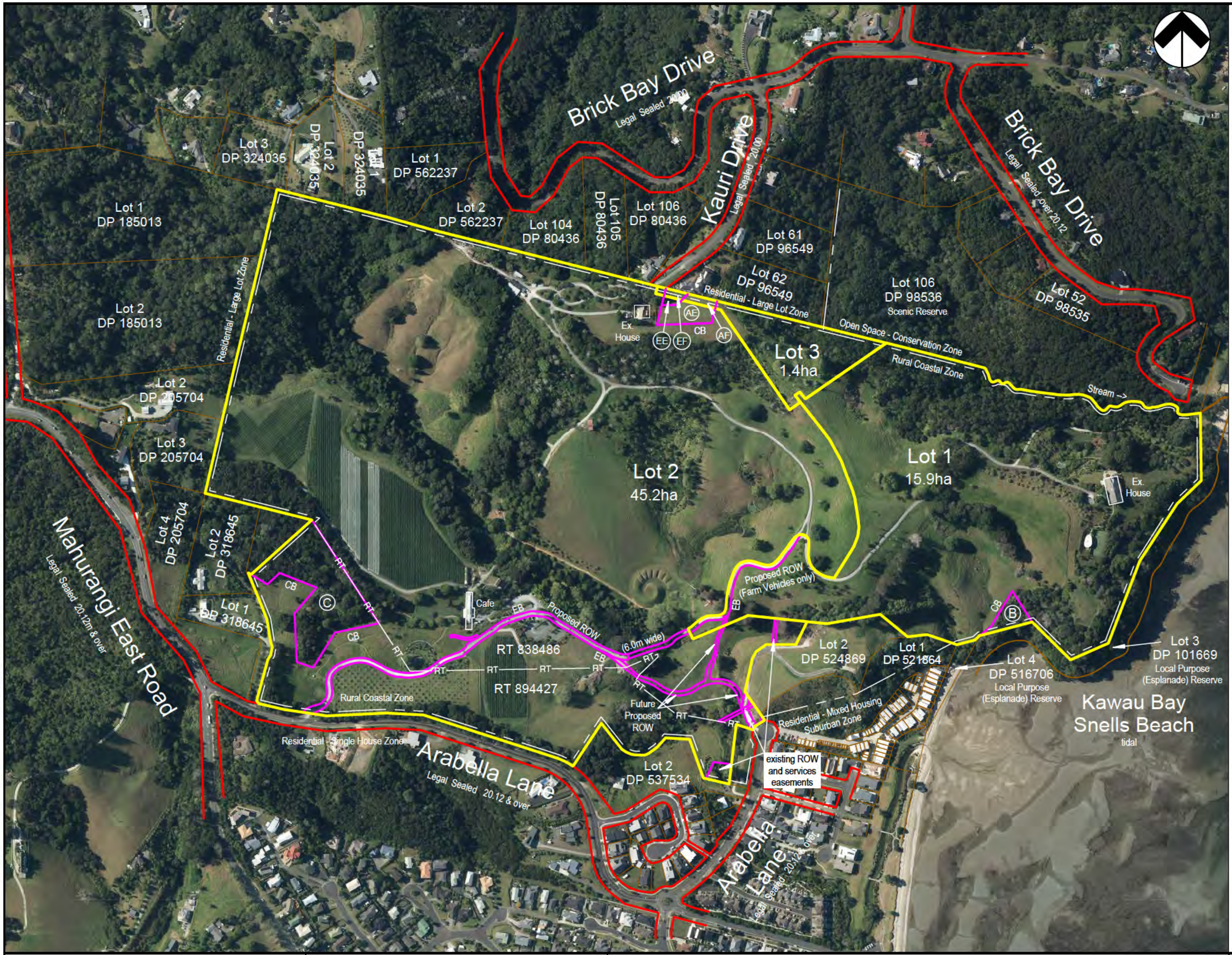
A description of the project and the activities it involves (s13(4)(a)) FTAA

The project is the construction and operation of a luxury visitor accommodation lodge comprising some 45 visitor accommodation suites and associated facilities. The visitor accommodation suites will be a mix of villas, cottages, and tree houses. They will be supported by lodge facilities including reception services, a restaurant, pool house and gym, restoration pavilion and wellness retreat, and a beach house. These will be as generally shown on the Master Plan at **Attachment C**.

The project will include the following additional activities:

- Subdivision generally as shown on the Preliminary Subdivision Scheme Plan at **Attachment B** to establish new titles for the proposed lodge, a new residential dwelling (described below) and for the balance of the site, with the necessary easements including for access and services. The new title for the lodge will also be subject to a unit title subdivision to create principal units, accessory units and future development units around visitor accommodation suites and lodge facilities.
- Earthworks and civil works for building platforms, roading and landscaping, and the installation and operation of services and infrastructure associated with the project.
- Minimal removal and modification of vegetation as required to provide for new lodge buildings and facilities.
- Wastewater disposal either via a new connection to public services at Snells Beach or by of treatment and disposal to land within the project area.
- The taking, using, damming and diversion of water and drilling should that be required for potable or other water supply purposes.
- The diversion and discharge of stormwater runoff from impervious areas.
- The provision of new parking, access and manoeuvring areas.
- Helicopter landings and take-offs within the project area, with controls on the number and timing of movements and flight paths.
- Conversion and alteration of the owners' existing dwelling on the property (numbered as "50" on the Master Plan) and the associated tennis pavilion as new lodge facilities.
- Construction of a new dwelling on the proposed lot 3 shown on the Preliminary Subdivision Scheme Plan to replace the existing owners' dwelling on the property.
- Temporary construction activities associated with the above, including sediment control measures.

Attachment B



Notes:

- Areas and dimensions are approximate only and are subject to survey.
- Zone:
  Auckland Unitary Plan
  - Rural - Rural Coastal Zone.
  - Overlays -High Natural Character Outstanding Natural Landscapes, Historic Heritage Overlay Extent of Place, Significant Ecological Areas & Natural Stream Management Areas
- Proposed Lot 1 will be subject to a subdivision to create principle units, accessory units and future development units associated with the proposed Brick Bay Lodge, and with the necessary easements over Lot 2 in favour of Lot 1, generally as shown on the Preliminary Subdivision Scheme Plan
- Areas labelled B & C are subject to requirements under Consent Notice D541225.5 (native bush protection)
- Areas labelled AE, AF, EE and EF are subject to a Deed of Restrictive Covenant B297036.5 (building restrictions)
- Areas labelled AE and AF are subject to a land covenant in EI 5834923.2 (planting restriction)
- Comprised in RT's : 838486 & 894427
- Total area: 62.5222 ha.
- EB = Easement Boundary
- CB = Covenant Boundary

Scale 1:5000

50 0 50 100 150 200

buckton surveyors and planners

[redacted]

Prepared for

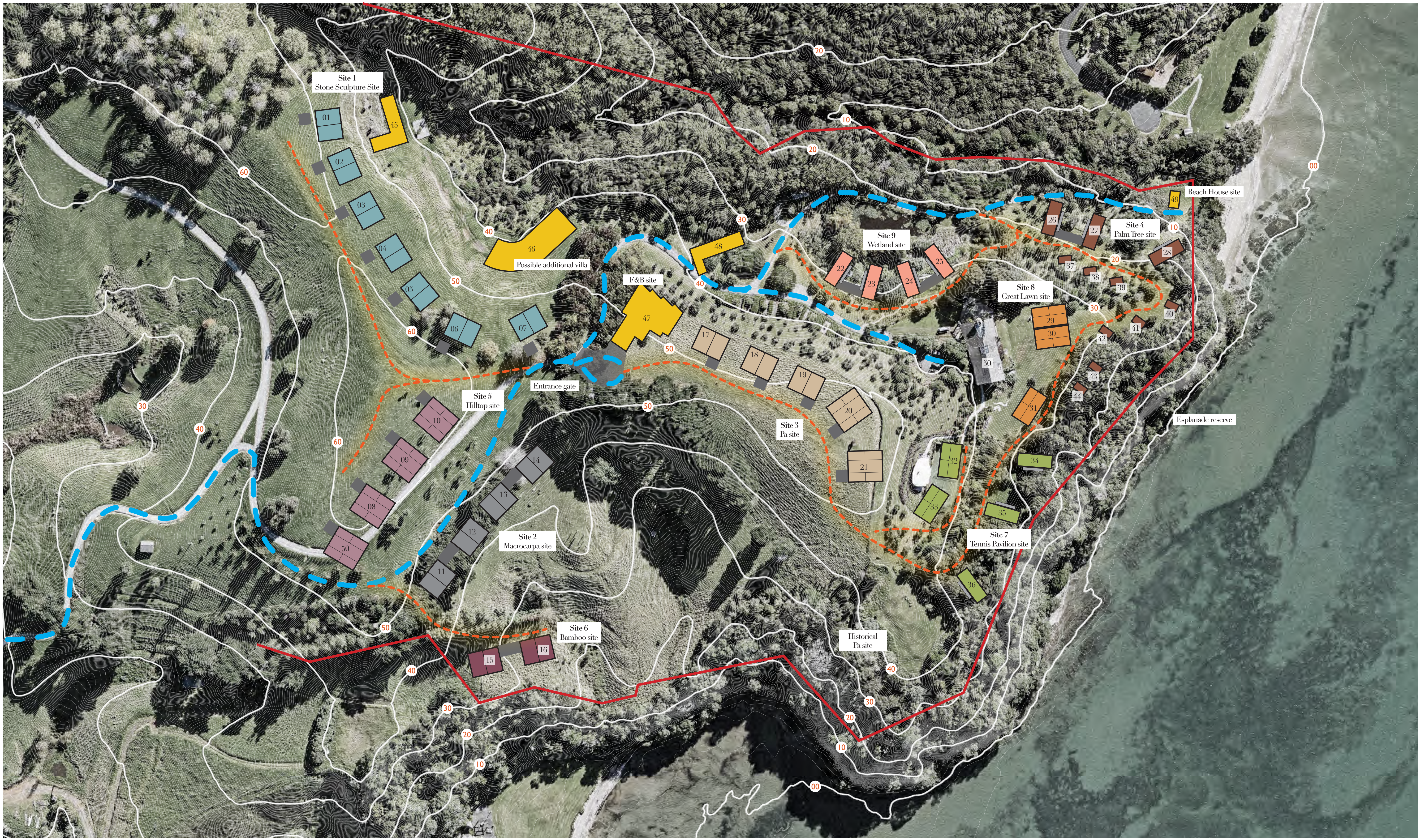
Christine and Richard Didsbury

[redacted]

Preliminary Subdivision Scheme Plan

Address: 52 Kauri Drive, Snells Beach

Scale: 1:5000 (A3)			
Job: 9684	Date: 19/05/2026	Drawn: SMC	Reviewed: RJC
Drawing: MS 01	Rev: -	Sheet: 1 of 1	



Key

Site 1 Stone sculpture site	7 Villas	Site 6 Bamboo site	2 Villas	Primary Vehicle Access road
Site 2 Macrocarpa site	4 Villas	Site 7 Tennis Pavillion site	5 Cottages	Golf Cart road
Site 3 Pā site	5 Villas	Site 8 Great Lawn site	3 Cottages	
Site 4 Palm Tree site	3 Cottages, 8 Treehouses	Site 9 Wetland site	4 Cottages	
Site 5 Hilltop site	4 Villas	Amenity sites		

1:2000 0 20 40 100 200 Meters

4 Bedroom Villas *Two Level* | 4 Bedroom Villas | 2 Bedroom Cottages | 2 Bedroom *Two level* | Treehouse

Proposed Masterplan

Glaister Keegan LAWYERS

TITLE REPORT: BRICK BAY, 52 KAURI DRIVE, SNELLS BEACH

Record of Title Identifier: 838486 (copy enclosed)
Legal Description: Lots 1 & 4 on Deposited Plan 524869 and Lot 2 on Deposited Plan 105559
Land Registration District: North Auckland
Estate: Fee Simple
Area: 55.4017 hectares more or less
Registered Owners: Richard John Didsbury as to a ½ share, Christine Didsbury as to a ½ share

No.	Interest	Comments
1	Deed of Restrictive Covenant B297036.5	Applies in perpetuity (unless agreed surrendered by all affected parties). No building, structure, tree or shrub can be erected on the covenanted area (except for an approved fence). The covenanted area is marked 'E' on Lot 2 DP 105559 (to the north near Kauri Drive) and is identified as areas "EE" and "EF" on the Preliminary Subdivision Scheme Plan (at Attachment B). *NB: This Covenant was later varied (by Variation of Covenant 5834923.1) to remove the restriction against trees or scrubs being erected on the subject area.*
2	Easement Certificate B297036.6	Historic rights of way have fallen down onto Lot 2 DP 105559 (in its favour) over land to the south-west near Mahurangi East Road.
3	Council Notice B617439.1 for the issue of a building permit pursuant to Section 641A(1) of the Local Government Act 1974	An historic building permit was issued for Lot 2 DP 105559 in 1987. Likely relates to an existing structure.
4	Consent Notice D541225.5	A native bush protection covenant affects Lots 1 & 4 DP 524869 as a condition of a prior subdivision. Existing landscape, trees and bush on the covenanted areas are to be preserved; pest and noxious plant control to be carried out; and stock-proof fencing maintained. Council consent is required to any variation of this covenant and additional/alternative conditions may be imposed as part of any such consent. The covenanted areas are identified as areas "B" and "C" on the Preliminary Subdivision Scheme Plan (at Attachment B).
5	Land Covenant in Easement Instrument 5834923.2	Affects Lot 2 DP 105559. All landscaping/planting on the covenanted area must be pre-approved by the owner of the dominant tenement (being the land now having the address of 25 Kauri

		Drive). The covenanted area is located on the northern side of Lot 2 near Kauri Drive and is identified as areas "AE" and "AF" on the Preliminary Subdivision Scheme Plan (at Attachment B).
6	Land Covenants in Easement Instruments 8478221.4, 8486158.3, 8486158.5, 8838016.1, 8902541.1, 8996743.8, 8996743.11, 10751451.12 and 11275267.6	Provides that the owners of certain specified Lots located along Arabella Lane and Boathouse Bay Lane cannot lodge any submission to object or appeal to any resource consent to subdivide, develop or use the land in Lot 2 DP 105559 and includes some land use activities (such as viticulture, helicopter landing pad and private functions). Likely Mr Didsbury were successful in negotiating this no-objection covenant with certain owners of the southern subdivision and has registered these covenants where possible. Note these are not blanket covenants, but apply to certain Lots and also the covenants themselves have differing strengths (with some only applying whilst R&C Didsbury are the registered owners of the land and some not extending to non-residential use).
7	Land Covenants in Easement Instruments 10009162.1, 10009162.2 and 10207620.1	These covenants have now expired and no longer apply.
8	Encumbrance to Auckland Council 8682337.3	Affects Lot 2 DP 105559. Must ensure that the total flood storage volume of not less than 10,300 cubic metres is maintained at all times in the four ponds on Lot 2 DP 105559 to attenuate stormwater runoff from the catchment.
9	Easement Instrument 8969612.1	Vector has a right to convey electricity over that part of Lot 2 DP 105559 marked 'A' on additional DP 447605 (copy enclosed). Vector rights of access and non-obstruction apply to this area.
10	Consent Notice 10998606.1	Affects Lots 1 & 4 DP 524869. Contains various building requirements; height restrictions; landscaping requirements; on-site stormwater and wastewater disposal; covenanted bush areas; and weed/pest control. The covenanted areas are identified as areas "B" and "C" on the Preliminary Subdivision Scheme Plan (at Attachment B).
11	Variation of Covenant 5834923.1	Varies Restrictive Covenant B297036.5 (set out in item 1 above) to remove the restriction against trees or scrubs being erected on the subject area.
12	Subject to Section 241(2) Resource Management Act 1991	Lots 1 & 4 on Deposited Plan 524869 and Lot 2 on Deposited Plan 105559 held in Record of Title 838486 are subject to an amalgamation condition. Council consent is required for separate disposal or separate titling.
13	Easement Instrument 11163154.6	Vector has a right to convey electricity over those parts of Lot 1 DP 524869 marked 'E', 'F', 'G', 'H', 'I', 'K' and 'L'. Vector rights of access and non-obstruction apply to these areas. These are specified easements pursuant to Section 243(a) of the RMA requiring Council consent to surrender or vary.
14	Easement Instrument 11163154.7	The areas marked 'E', 'F' and 'G' on Lot 1 DP 524869 are subject to a right of way, right to convey telecommunications and computer media in favour of neighbouring Lot 2 DP 524869. However,

		these easements are to extinguish upon areas 'E', 'F' and 'G' being vested as public road. These are specified easements pursuant to Section 243(a) of the RMA requiring Council consent to surrender or vary.
15	Mortgage to Kiwibank Limited 12376157.2	
16	Variation of Mortgage to Kiwibank Limited 13222533.1	
Record of Title Identifier: 894427 (copy enclosed) **Legal Description:** Lot 1 on Deposited Plan 537534 **Land Registration District:** North Auckland **Estate:** Fee Simple **Area:** 7.1205 hectares more or less **Registered Owners:** Brick Bay Trustee Limited		
No.	**Interest**	**Comments**
17	Consent Notice D541225.5	A native bush protection covenant affects Lots 1 & 4 DP 524869 as a condition of a prior subdivision. Existing landscape, trees and bush on the covenanted areas are to be preserved; pest and noxious plant control to be carried out; and stock-proof fencing maintained. Council consent is required to any variation of this covenant and additional/alternative conditions may be imposed as part of any such consent. The covenanted areas are identified as areas "B" and "C" on the Preliminary Subdivision Scheme Plan (at Attachment B).
18	Easement Instrument 5808888.5	A right of way and an electricity, telecommunication and computer media easement in favour of Lot 1 DP 537534 over land hugging the western boundary of this Lot (marked 'D' on DP 318645 – copy enclosed), allowing access for this Lot to and from Arabella Lane and the laying, installation and maintenance of electricity lines, telecommunications and computer media.
19	Land Covenants in Easement Instruments 8478221.3, 8486158.4, 8486158.8, 8838016.1, 8902541.1, 8996743.11, and 10751451.12	Provides that the owners of certain specified Lots located along Arabella Lane, Koru Place, Ahi Kaa Lane, Hampton Mews, and Mahurangi East Road cannot lodge any submission to object or appeal to any resource consent to subdivide, develop or use the land in Lot 1 DP 537534 (among others). Some of the instruments include pre-approval of any planning proposal for the use of the land. Note these are not blanket covenants, but apply to certain Lots and also the covenants themselves have differing strengths (with some only applying whilst R & C Didsbury or Whisper Cove Heights Ltd are the registered owners of the land and some not extending to non-residential use).
20	Easement Instrument 9676072.2	Auckland Council has a right to drain water over that part of Lot 1 DP 537534 marked 'Y' on DP 537534. Auckland Council has additional rights to access and maintain the drainage channels and structures that allow water to drain from the duck pond on the eastern end of this Lot.

21	Consent Notice 11584065.2	Affects Lots 1 & 2 DP 537534. Contains various building requirements; geomechanical engineering report required for each building not erected on the designated building platform due to soil stability issues; on-site stormwater management and wastewater disposal; and provision of telecommunication services.

Summary of impact interests may have on the timely delivery of the project:

In our view, the above interests will not impact on the timely delivery of the project. The covenants that restrict or control building works and landscaping/planting apply to the northern part of proposed Lot 2 on the Preliminary Subdivision Scheme Plan (at Attachment B), more particularly identified as areas “AE”, “AF”, “EE” and “EF” on that Plan. These areas sit outside of proposed Lot 1 where the lodge facilities are to be located. Furthermore, the lodge facilities do not require any rights of way or servicing to or from these areas. The covenants that protect and preserve native bush apply to the southern part of proposed Lot 1 and the south-western part of proposed Lot 2 on the Preliminary Subdivision Scheme Plan, more particularly identified as areas “B” and “C” on that Plan. Once again, these areas fall outside of where the lodge facilities will be located and, in any event, these native bush areas are intended to be preserved/maintained.

Enclosures:

1. Record of Title 838486
2. Deposited Plan 447605
3. Record of Title 894427
4. Deposited Plan 318645

RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD

Guaranteed Search Copy issued under Section 60 of the Land Transfer Act 2017

R.W. Muir
Registrar-General
of Land

Identifier **838486**
Land Registration District **North Auckland**
Date Issued 01 August 2018

Prior References
805956 NA58A/1147

Estate Fee Simple
Area 55.4017 hectares more or less
Legal Description Lot 1, 4 Deposited Plan 524869 and Lot 2 Deposited Plan 105559

Registered Owners
Richard John Didsbury as to a 1/2 share
Christine Didsbury as to a 1/2 share

Interests

B297036.5 Deed of Restrictive covenant - 8.6.1984 at 11.19 am (Affects Lot 2 DP 105559)

Appurtenant to Lot 2 DP 105559 are rights of way specified in Easement Certificate B297036.6 - 8.6.1984 at 11.19 am

B617439.1 Notice that the Council has issued a building permit pursuant to Section 641A(1) of the Local Government Act 1974 in respect of a building on the within land - 12.1.1987 at 2.15 pm (Affects Lot 2 DP 105559)

D541225.5 Consent Notice pursuant to Section 221(1) Resource Management Act 1991 - produced 14.9.2000 at 2.39 pm and entered 26.9.2000 at 9.00 am (affects Lots 1 and 4 DP 524869)

5834923.1 Variation of the conditions of the Covenant created by B297036.5 - 11.12.2003 at 9:00 am

Land Covenant in Easement Instrument 5834923.2 - 11.12.2003 at 9:00 am (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 8478221.4 - 28.4.2010 at 3:34 pm (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 8486158.3 - 13.5.2010 at 9:38 am (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 8486158.5 - 13.5.2010 at 9:38 am (Affects Lot 2 DP 105559)

8682337.3 Encumbrance to Auckland Council - 11.2.2011 at 5:01 pm (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 8838016.1 - 13.10.2011 at 9:55 am (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 8902541.1 - 7.11.2011 at 1:37 pm (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 8996743.8 - 1.3.2012 at 3:49 pm (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 8996743.11 - 1.3.2012 at 3:49 (Affects Lot 2 DP 105559)

Subject to a right (in gross) to convey electricity over part Lot 2 DP 105559 marked A on DP 447605 in favour of Vector Limited created by Easement Instrument 8969612.1 - 18.5.2012 at 9:13 am

Land Covenant in Easement Instrument 10009162.1 - 16.4.2015 at 1:56 pm (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 10009162.2 - 16.4.2015 at 1:56 pm (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 10207620.1 - 16.11.2015 at 4:07 pm (Limited as to duration) (Affects Lot 2 DP 105559)

Land Covenant in Easement Instrument 10751451.12 - 12.6.2017 at 9:03 am (Affects Lot 2 DP 105559)

10998606.1 Consent Notice pursuant to Section 221 Resource Management Act 1991 - 18.5.2018 at 1:58 pm (Affects Lots 1 and 4 DP 524869)

Subject to Section 241(2) Resource Management Act 1991 (affects DP 524869)

Subject to a right (in gross) to convey electricity over part Lot 1 DP 524869 marked E, F, G, H, I, K and L on DP 524869 in favour of Vector Limited created by Easement Instrument 11163154.6 - 1.8.2018 at 8:51 am

The easements created by Easement Instrument 11163154.6 are subject to Section 243 (a) Resource Management Act 1991

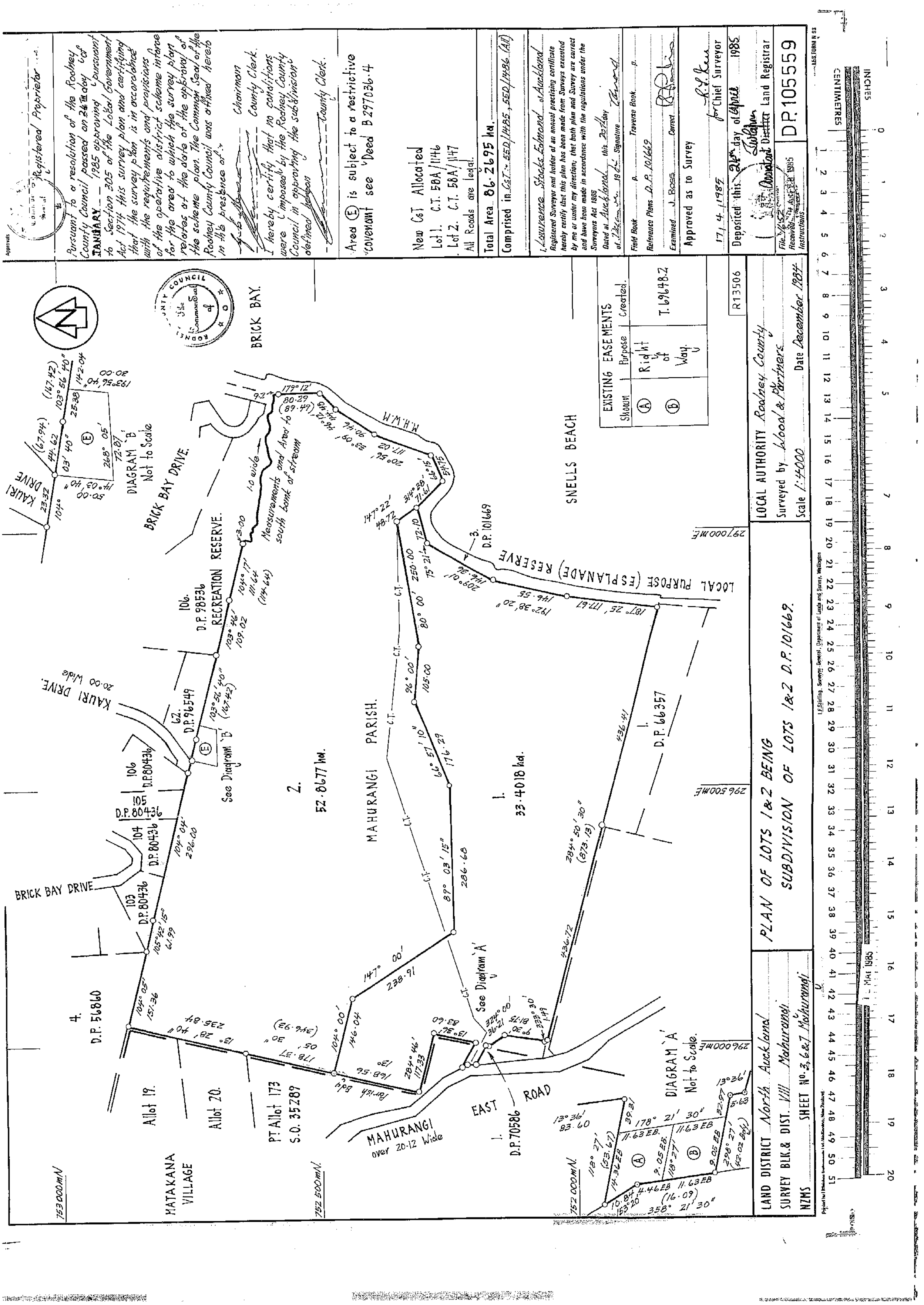
Subject to a right of way, right to convey telecommunications and computer media over part Lot 1 DP 524869 marked E, F and G on DP 524869 created by Easement Instrument 11163154.7 - 1.8.2018 at 8:51 am

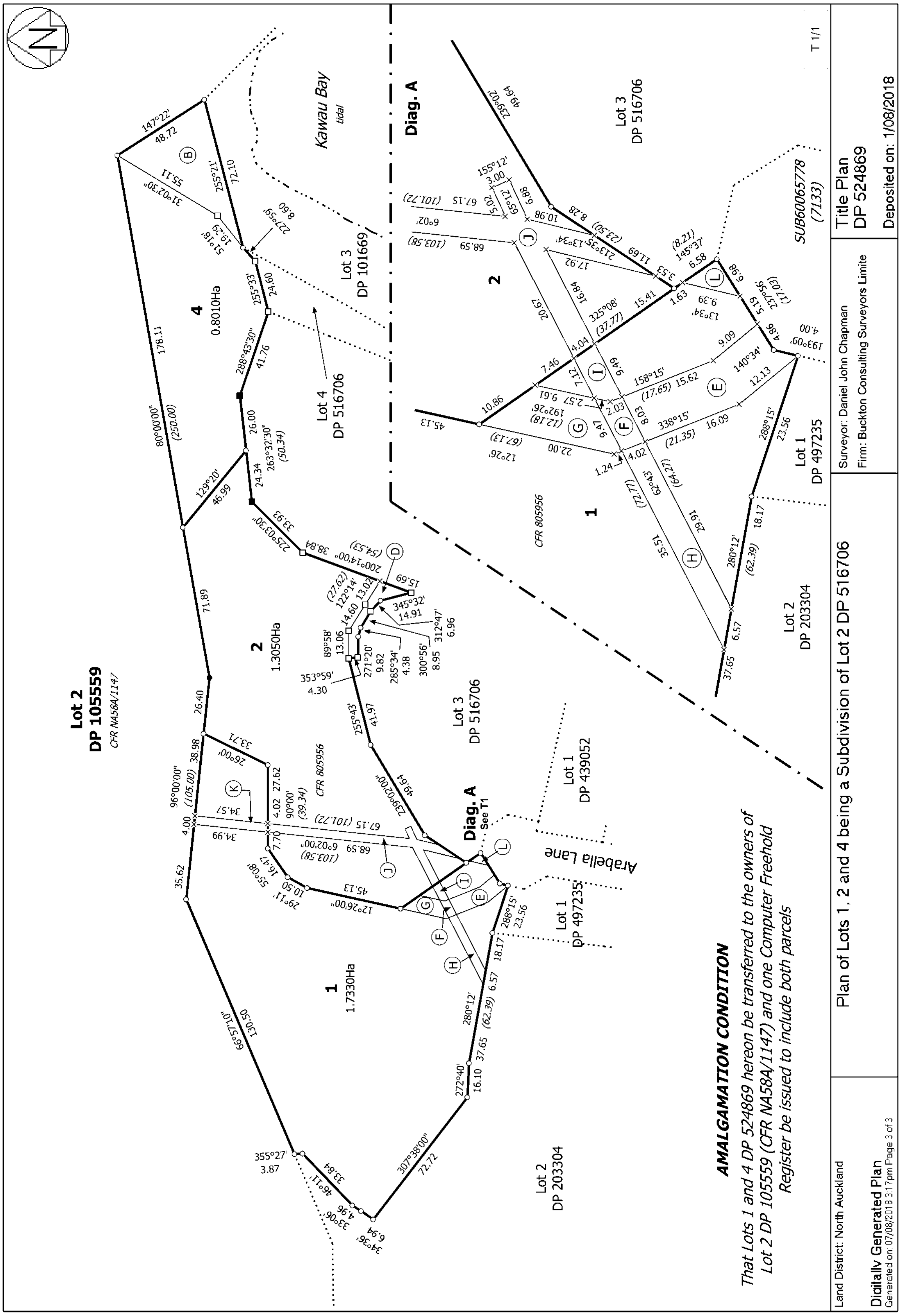
The easements created by Easement Instrument 11163154.7 are subject to Section 243 (a) Resource Management Act 1991

Land Covenant in Easement Instrument 11275267.6 - 6.11.2018 at 12:03 pm

12376157.2 Mortgage to Kiwibank Limited - 18.2.2022 at 5:01 pm

13222533.1 Variation of Mortgage 12376157.2 - 11.2.2025 at 1:30 pm


PLAN OF LOTS 1&2 BEING SUBDIVISION OF LOTS 1&2 D.P.101669.
DP 105559
LOCAL AUTHORITY Rodney County
Surveyed by Wood & Partners
Scale 1:4000
Date December 1984
LAND DISTRICT North Auckland
SURVEY BLK.& DIST. VIII Mahurangi
NZMS SHEET No 3,6&7 Mahurangi
EXISTING EASEMENTS
Shown
Purpose
Created
Right of Way.
T.69648.2
R13506
New C&T Allocated
Lot 1. C.T. 58A/1146
Lot 2. C.T. 58A/1147
All Roads are legal.
Total Area 86.2695 ha.
SNELLS BEACH
BRICK BAY.
BRICK BAY DRIVE.
KAURI DRIVE.
DIAGRAM 'B' Not to Scale
DIAGRAM 'A' Not to Scale.
LOCAL PURPOSE (ESPLANADE) RESERVE
RECREATION RESERVE.
MAHURANGI PARISH.
MAHURANGI EAST ROAD
MATAKANA VILLAGE
M.H.W.M.
2.
52.8677 ha.
1.
33.4018 ha.
D.P. 66357
D.P. 101669
D.P. 70586
D.P. 56860
D.P. 98536
D.P. 96549
Pt Allot 173 S.O. 35289
Allot 19.
Allot 20.


Title Plan
DP 524869
Deposited on: 1/08/2018
T 1/1
Plan of Lots 1, 2 and 4 being a Subdivision of Lot 2 DP 516706
AMALGAMATION CONDITION
That Lots 1 and 4 DP 524869 hereon be transferred to the owners of Lot 2 DP 105559 (CFR NA58A/1147) and one Computer Freehold Register be issued to include both parcels
Land District: North Auckland
Surveyor: Daniel John Chapman
Firm: Buckton Consulting Surveyors Limite
Digitally Generated Plan
Generated on 07/08/2018 3:17pm Page 3 of 3
Diag. A
Kawau Bay
tidal
Lot 2
DP 105559
Lot 3
DP 101669
Lot 4
DP 516706
Lot 3
DP 516706
Lot 1
DP 439052
Lot 1
DP 497235
Lot 2
DP 203304
Arabella Lane
SUB60065778
4
0.8010Ha
2
1.3050Ha
1
1.7330Ha
CFR 805956

Title Plan - DP 447605

Survey Number	DP 447605
Surveyor Reference	11031
Surveyor	Mark Louis Hatten
Survey Firm	Thurlow Consulting Engineers & Surveyors Limited
Surveyor Declaration	I Mark Louis Hatten, being a licensed cadastral surveyor, certify that: (a) this dataset provided by me and its related survey are accurate, correct and in accordance with the Cadastral Survey Act 2002 and the Rules for Cadastral Survey 2010, and (b)the survey was undertaken by me or under my personal direction. Declared on 22 Dec 2011 03:31 PM

Survey Details

Dataset Description	Easement Over Lot 2 DP 105559		
Status	Deposited		
Land District	North Auckland	**Survey Class**	Class A
Submitted Date	22/12/2011	**Survey Approval Date**	20/01/2012
		Deposit Date	18/05/2012

Territorial Authorities

Auckland

Created Parcels

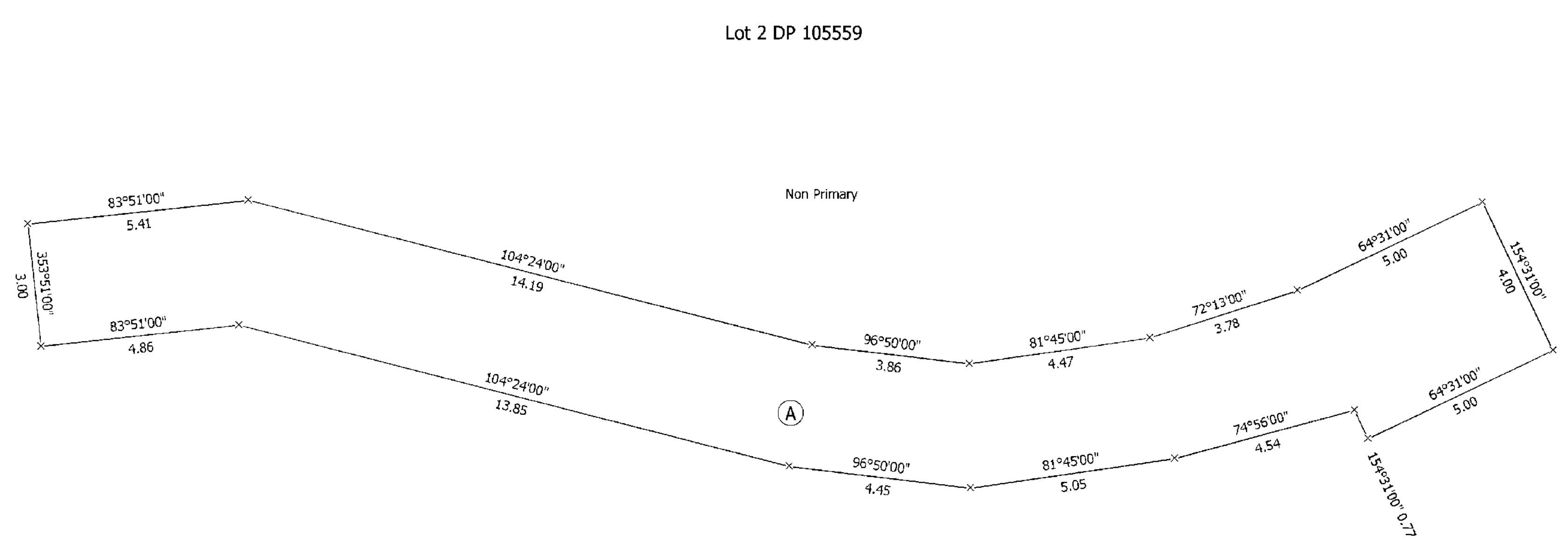
Parcels	Parcel Intent	Area	CT Reference
Area A Deposited Plan 447605	Easement		
Total Area		0.0000 Ha	

Schedule / Memorandum

Land District	Plan Number
North Auckland	**DP 447605**

Territorial Authority
Auckland Council

PROPOSED EASEMENTS IN GROSS			
Purpose	**Shown**	**Servient Tenement**	**Grantee**
RIGHT TO CONVEY ELECTRICITY	A	LOT 2 DP 105559	VECTOR LIMITED (IN GROSS)



TCES REF: 11031

T 1/1

Land District: North Auckland Dataset Type: Parcels without Survey Information Digitally Generated Plan Generated on: 31/05/2012 3:57pm Page 3 of 3	Easement Over Lot 2 DP 105559	Surveyor: Mark Louis Hatten Firm: Thurlow Consulting Engineers & Surv	Title Plan **DP 447605** Deposited on: 18/05/2012

RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD

Guaranteed Search Copy issued under Section 60 of the Land Transfer Act 2017

R.W. Muir
Registrar-General
of Land

Identifier **894427**
Land Registration District **North Auckland**
Date Issued 18 October 2019

Prior References
771763

Estate Fee Simple
Area 7.1205 hectares more or less
Legal Description Lot 1 Deposited Plan 537534
Registered Owners
Brick Bay Trustee Limited

Interests

D541225.5 Consent Notice pursuant to Section 221 Resource Management Act 1991 - 14.9.2000 at 2.39 pm and entered 26.9.2000 at 9.00 am (Affects part formerly Lot 3 DP 318645)

Appurtenant hereto is a right of way and a electricity, telecommunication and computer media easement created by Easement Instrument 5808888.5 - 21.11.2003 at 9:00 am

Some of the easements created by Easement Instrument 5808888.5 are subject to Section 243 (a) Resource Management Act 1991 (See DP 318645)

Land Covenant in Easement Instrument 8478221.3 - 28.4.2010 at 3:34 pm

Land Covenant in Easement Instrument 8486158.4 - 13.5.2010 at 9:38 am

Land Covenant in Easement Instrument 8486158.8 - 13.5.2010 at 9:38 am

Land Covenant in Easement Instrument 8838016.1 - 13.10.2011 at 9:55 am

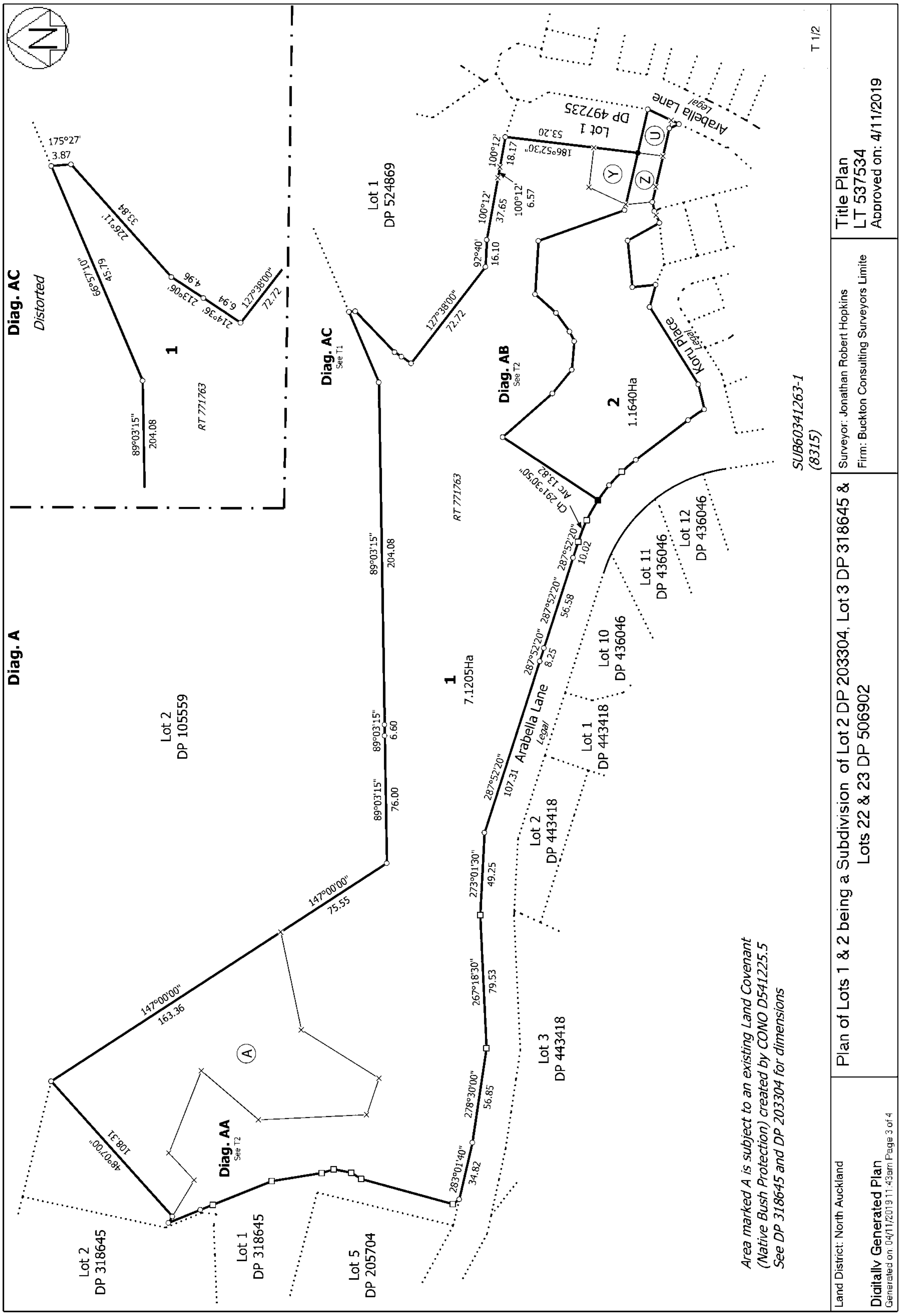
Land Covenant in Easement Instrument 8902541.1 - 7.11.2011 at 1:37 pm

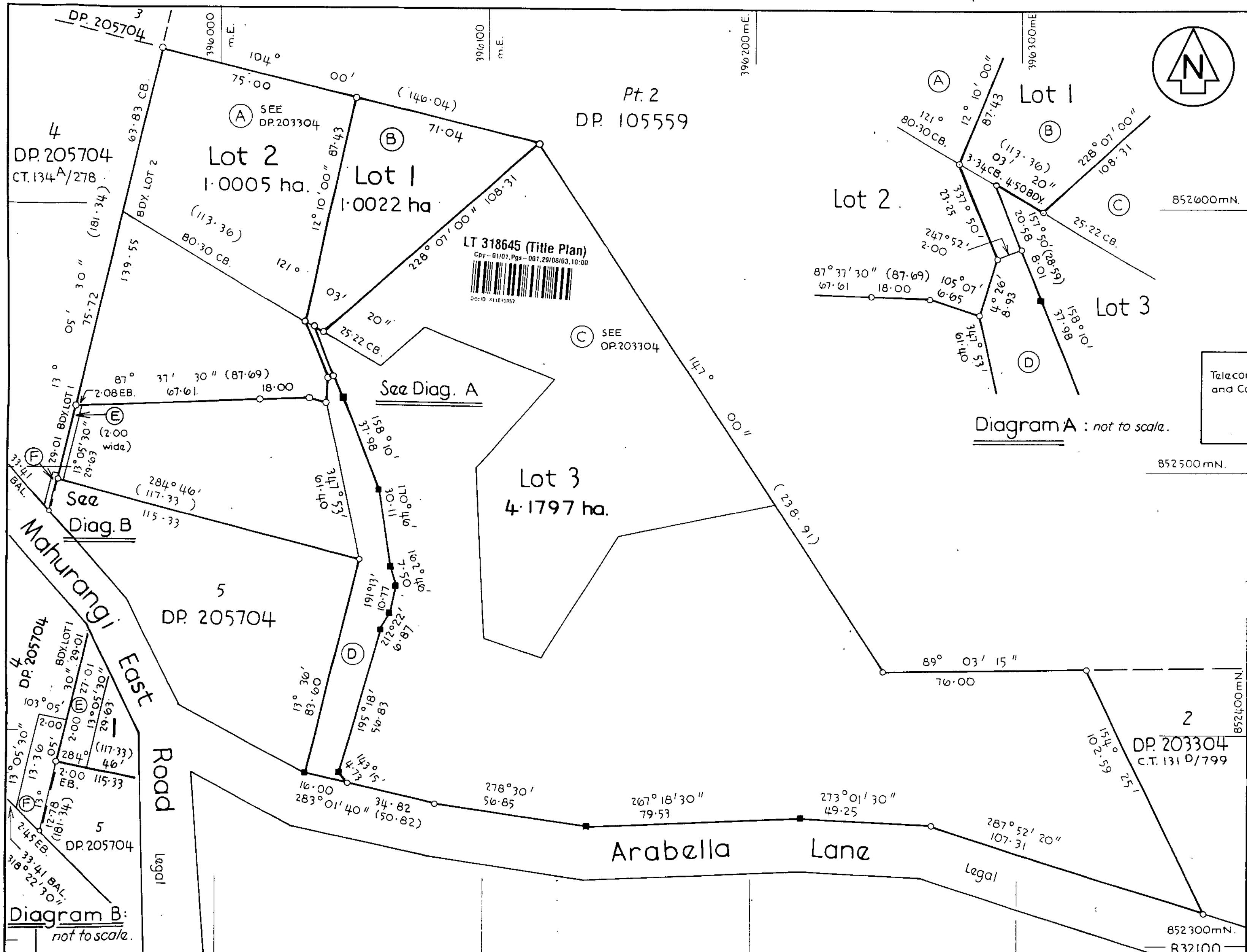
Land Covenant in Easement Instrument 8996743.11 - 1.3.2012 at 3:49 pm

Subject to a right to drain water (in gross) over part marked Y on DP 537534 in favour of the Auckland Council created by Easement Instrument 9676072.2 - 16.5.2014 at 1:12 pm

Land Covenant in Easement Instrument 10751451.12 - 12.6.2017 at 9:03 am

11584065.2 Consent Notice pursuant to Section 221 Resource Management Act 1991 - 18.10.2019 at 3:24 pm


Title Plan
LT 537534
Approved on: 4/11/2019
Surveyor: Jonathan Robert Hopkins
Firm: Buckton Consulting Surveyors Limite
Plan of Lots 1 & 2 being a Subdivision of Lot 2 DP 203304, Lot 3 DP 318645 & Lots 22 & 23 DP 506902
Land District: North Auckland
Digitally Generated Plan
Generated on 04/11/2019 11:43am Page 3 of 4
SUB60341263-1
(8315)
T 1/2
Area marked A is subject to an existing Land Covenant (Native Bush Protection) created by CONO D541225.5
See DP 318645 and DP 203304 for dimensions
Diag. A
Diag. AC
Distorted
Diag. AB
See T2
Diag. AA
See T2
Diag. AC
See T1
1
7.1205Ha
2
1.1640Ha
RT 771763
Lot 2
DP 105559
Lot 1
DP 524869
Lot 1
DP 497235
Arabella Lane
Legal
Koru Place
Legal
Lot 12
DP 436046
Lot 11
DP 436046
Lot 10
DP 436046
Lot 1
DP 443418
Lot 2
DP 443418
Lot 3
DP 443418
Lot 2
DP 318645
Lot 1
DP 318645
Lot 5
DP 205704



Approvals

I hereby certify that this plan was approved by the Rodney District Council pursuant to Section 223 of the Resource Management Act 1991 on the 26th day of February 2003 subject to the granting or reserving of the easement set out in the Memorandum hereon and subject to the amalgamation set out hereon.

Authorised Officer

MEMORANDUM OF EASEMENT

purpose	shown	servient tenement	dominant tenement
R.O.W.	D	LOT 1	LOTS 2 & 3

PROPOSED EASEMENTS

purpose	shown	servient tenement	dominant tenement
Electricity, Telecommunication and Computer Media.	D,	LOT 1	LOTS 2 & 3
	E	LOT 1	LOT 2
	F	LOT 4 DP. 205704 CT. 134A/278	LOTS 1 & 2 hereon

AMALGAMATION CONDITION

That Lot 3 hereon and Lot 2, DP. 203304, (C.T. NA 131D/799) be held in one certificate of title. See file A 174922

Areas marked A, B & C are subject to existing Land Covenants, see DP. 203304.

New C.s.T. allocated

Lot 1 73041
Lot 2 73042
Lot 3 73043

CLASS I SURVEY

Total Area 6·1824 ha.

Comprised in C.T. 131D/798
(C.T. 134A/278 easmt only), (C.T. 131D/799 amalg)

I Anthony Russell Hayman of Warkworth
being a person entitled to practise as a registered surveyor certify that:
(a) The surveys to which this dataset relates are accurate, and were undertaken by me or under my direction in accordance with the Survey Act 1986 and the Survey Regulations 1998.
(b) This dataset is accurate and has been created in accordance with that Act and those Regulations.

Signed ______ Date 15/08/03

Field Book ____ p. ____ Traverse Book ____ p. ____
Reference Plans ______

Examined ______ Correct ______

Approved as to Survey by Land Information NZ on
16/9/2003 ~~Approving Surveyor~~

Deposited by Land Information NZ on
21/11/2003 ~~Registrar General of Land~~

File
Received 29 AUG 2003
Instructions

D.P. 318645

LAND DISTRICT North Auckland
Survey Blk. & Dist. VIII Mahurangi
NZMS 261 Sheet ______ Record Map No. ______

Lots 1, 2 and 3 being a subdivision of Lot 1, D.P. 203304 and easement over Lot 4, D.P. 205704.

TERRITORIAL AUTHORITY Rodney District
Surveyed by Buckton Consultants (4700)
Scale 1:1000 Date December 2002

Attachment E

A description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects (s13(4)(h)) FTAA

1. Anticipated and known adverse effects of the project

Section 3.9 of the Referral Application Report provides a description of the anticipated and known adverse effects of the project on the environment.

In addition to the effects described in section 3.9, we set out below a description of the following additional anticipated and known effects:

- Construction, including earthworks.
- Wastewater Disposal
- Subdivision

Construction, including earthworks

The project will involve construction activities including earthworks. Construction activities are anticipated to span an estimated 4-5 year period, across the two main tranches of development.

Earthworks for the formation of building platforms, accessways and installation of services will be required. In general terms, buildings will be designed and sited to minimise cut and fill. Existing internal roads and tracks will be widened with new formation and gradients, and the need for new roads to service accommodation minimised, including through the use of golf cart tracks as shown on the Master Plan at **Attachment C**. The extent and volume of earthworks will be determined at the next design stage and will be set out in the substantive application. It is anticipated that a cut/fill balance will generally be achieved with the project however, thereby minimising or avoiding the need for the export and disposal of material or the importation of bulk fill.

The effects of earthworks will be managed by way of an Erosion and Sediment Control Management Plan, prepared in accordance with Auckland Council Guideline Document 2016/005[4], as part of a Construction Management Plan. These documents will set out the extent and volumes of earthworks, staging and timing, erosion and sediment control measures and their operation, any temporary diversion and discharge of water, controls on the management of dust and the deposit of any materials to public roads, and details of the contractors. Conditions will be proposed with the substantive application requiring a Construction Management Plan (**CMP**) and an Erosion and Sediment Control Management Plan (**ESCMP**) to be submitted to Auckland Council for certification prior to the commencement of works and then adhered to for the duration of the works, unless amended by prior approval of the Council.

Construction access will be provided from the Arabella Lane cul de sac end, which the project area has frontage to. In the alternative, construction access could be provided from the existing access to the Brick Bay Wines & Sculpture Trail further westward on Arabella Lane; however, that would likely only be as a secondary alternative, to minimise the effects of construction traffic on that operation.

Construction laydown, temporary site offices and parking will be accommodated within the project area.

[4] Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region June 2016, Guideline Document 2016/005 Incorporating Amendment 3, Reprinted August 2023

The effects of construction traffic will be managed by way of a Construction Traffic Management Plan **(CTMP)** which will include limits on hours of delivery to and from the site of construction materials to minimise impacts on residential dwellings on Arabella Lane, measures to ensure any deposition of material on public roads are cleaned up, wheel wash requirements and methods to manage site access.

Noise and vibration from construction is anticipated to be able to comply with the relevant standards of the Auckland Unitary Plan as received by noise sensitive activities on adjoining sites (including dwellings). Of note here is the considerable separation between the intended location of earthworks and building works relative to noise sensitive activities on adjoining sites. Measures to manage the effects of noise and vibration on nearby properties will be set out in the CMP.

Wastewater

As noted in Section 3.9.7 of the Referral Application Report, the site offers the opportunity of either connecting to the existing public services at Snells Beach or disposing wastewater to land after treatment. The preferred option is to connect to the public services, with that to be determined following the conclusion of currently ongoing discussions with Watercare.

Project civil engineers Hutchinson have sought further advice from specialist wastewater engineering firm Innoflow on preliminary concepts for wastewater treatment and disposal to land should that option be required. Innoflow recommend a system involving pre and primary wastewater treatment with pumped septic tanks, advanced secondary and tertiary wastewater treatment and disposal to land via dipper lines across multiple disposal bed locations contained within the project area.

Based on an assessment of wastewater demand from the proposed lodge and facilities, there will be approximately 20,000m^2 (ie 2ha) of land area needed for dripper lines, plus an additional 10,000m^2 of reserve area (assuming a 50% reserve area as required under TP58[5]).

A review of areas and slope indicates that the majority of the dripper line areas will be able to be accommodated within the proposed future Lot 1, with some (including the reserve area) accommodated in the future Lot 2. Easements will be in place with the subdivision for this purpose. In any event, the advice provided is that wastewater is able to be treated and disposed if to land within the project area, should that option be required.

Subdivision

The substantive application will be lodged as a land use and subdivision consent resource consent (plus 'regional consents' as required and as summarised in section 3.19 of the Referral Application report), thereby allowing comprehensive assessment of the effects of land use and subdivision.

A Preliminary Subdivision Scheme Plan is provide at **Attachment B** showing the project area subdivided into three separate titles (proposed Lots 1, 2 and 3).

A schedule of easements will be included with the substantive application to provide the appropriate mechanisms on the title for matters such as legal access and easements for services.

Subdivision conditions will also be provided with the substantive applications setting out matters required to be satisfied in relation to the titles created prior to s223 and s224 approvals being issued by the Council.

To ensure that the subdivision does not enable unanticipated effects, consent notice conditions will be also offered to be imposed on the lodge title (proposed Lot 1) to ensure that the activities thereon

[5] Auckland Regional Council Technical Publication No. 58 (TP 58), On-site Wastewater Systems: Design and Management Manual Third Edition ARC Technical Publication 2004

remain as visitor accommodation and associated activities, with restrictions against future residential construction or conversions.

2. The significance of the adverse effects

The anticipated and known adverse effects of the project on the environment will be of low significance for the following reasons:

- The adverse effects of the project will be localised and not at a regional or national scale. In this regard, given the nature and location of the project and surrounding landform, adverse effects will either be confined to the project area or to the immediate locality, with a limited receiving environment at coastal locations (the coastal marine area), the adjoining Snells Beach residential area and a relatively few adjoining rural-residential sites. Only a limited number of properties adjoin the project area, with the majority of known and anticipated effects on these properties buffered by land within the project area, intervening landform and/or vegetation.
- No physical resources of regional or national significance will be adversely affected, such as the state highway network or regionally significant infrastructure. The site will be able to be serviced using either existing capacity in the adjoining Snells Beach public water supply and wastewater network (subject to confirmation from Watercare), or alternatively through on-site provision and readily accessed using the capacity of existing public roads.
- No natural resources of regional or national significance will be adversely affected in a more than minor way, such as rare or threatened species or habitats of regional or national significance. As set out in section 3.9.5 of the Referral Application Report, any adverse effects of the proposed development within Significant Ecological Areas (SEAs) identified within the project area are limited in extent, able to be refined through design and manageable through established ecological and arboricultural practices. Similarly, the limited effects on identified areas of Outstanding Natural Landscape and High Natural Character will be able to be either avoided or mitigated through careful design, placement and operation of the lodge buildings and associated works.
- No major adverse economic effects are identified that would negate the significant regional and national benefits of the project as summarised in section 3.3.1 of the Referral Application Report.
- There will be no adverse effects on limited public resources such as public open space or the coastal marine area.
- Construction effects will be for the main confined to the site and will be temporary in duration, spanning an estimated 4-5 year period.

PETER HALL PLANNING LIMITED

30 June 2026

Stephanie Frame
Manager - Fast Track Operations
Ministry for the Environment
referral@fasttrack.govt.nz

Dear Stephanie

Response to request #2 for further information on the referral application of the Brick Bay Lodge project under the Fast-track Approvals Act 2024- FTAA-2603-1204

We refer to your letter of 9 June 2026 sent on behalf of the Minister of Infrastructure, requesting further information on the predicted economic benefits from the operation of the proposed Brick Bay lodge. We refer also and thank her for the email dated 23 June 2026 from Stephanie McNicholl, Senior Advisor, Fast Track Operations, responding to our request for further clarification in relation to your letter.

Your letter of 9 June 2026 made the following request:

> *Based on the information provided - there is limited information regarding the economic benefits in a national and/or regional context of the ongoing operation aspects of the project within the application documentation. Please provide further information and supporting evidence to substantiate and quantify the national and/or regional economic benefits of the proposed ongoing operation of the project beyond the construction phase. This should include, but not be limited to, the underlying metrics, assumptions and methodology used, as well as the anticipated scale, geographic extent, and duration of those benefits.*

The information is required to be received by 30 June 2026, 11.59PM.

In response to this request, economic consultants to the project Market Economics have updated their Economic Assessment Report **(the Market Economics Report)** that was submitted with the referral application. The updated Market Economics Report (version dated 26 June 2026) is attached to this letter[1].

A new Economic Impacts Summary section 5.9 has been added to the Market Economics Report, which includes the economic benefits in a national and/or regional context of the ongoing operational aspects of the project.

The operating phase impacts are addressed further also in section 5.4, where it is noted that lodge operating costs are forecast to begin at $11.9m per year (2026 prices) when the lodge opens in 2029 and rise to $18.8m (2026 prices) once the construction of all accommodation is complete and the lodge is fully open in 2032. Operations are estimated to sustain 3,576 direct job year equivalents over the operational period to 2055, all in Auckland. This is equivalent to 138 direct jobs per year. Including indirect and induced effects, total employment is 6,311 job-year equivalents – 242 per year on the same basis.

[1] Personal information has been redacted from the report as attached as per the referral application requirements.

To assist further, and in response to the type and form of information set out in the email of Stephanie McNicholl, a new Appendix 8 Table has been added to the Market Economics Report, which summarises the key values from the report which we understand may be useful to the Minister in determining the referral application (for example, additional visitor nights per annum, retained annual operational expenditure, total jobs per year of operation etc). Cross references to corresponding sections of the Market Economics Report where this information is summarised from is included in the Appendix 8 Table, with those sections providing further information in relation to the data.

The Market Economics Report maintains the conclusions at its section 7 that the project will deliver significant and sustained economic benefits to the Auckland region and to New Zealand, commencing during construction and extending across the 30-year appraisal period to 2055. That conclusion holds even on the conservative occupancy and spending assumptions adopted throughout the Market Economics Report.

Of particular note for this project is the conclusion that the economic rationale is reinforced by the nature of the investment. Brick Bay Lodge involves approximately $390m in greenfield equity FDI (including $25m land costs) at a time when New Zealand's FDI stock is 15 percentage points below the OECD median. This investment is additional relative to the counterfactual under which the capital will not enter New Zealand. Accordingly, the resulting activity, employment and export earnings are closer to net additions rather than displaced activity.

Finally, we can confirm that a more detailed economic assessment will be undertaken at the substantive applications stage, however we are confident that the information contained in the updated Market Economics Report confirms in respect to s22(2)(a)(iv) of the FTAA, that the project will deliver significant economic benefits, at both construction and operating phases.

Yours sincerely

Peter Hall BPlan, MNZPI
Director | Peter Hall Planning Limited

Brick Bay Lodge Development

FTAA Referral Economic Assessment

26 June 2026

Brick Bay Lodge Development

FTAA Referral Economic Assessment

Prepared for

Christine and Richard Didsbury

Document reference:	BBL 001.25
Date of this version:	26 June 2026
Report author(s):	Tom Harris
	[redacted]
	Greg Akehurst
	[redacted]
Director approval:	Greg Akehurst
	[redacted]

[redacted]

Contents

Figures and Tables

Executive Summary

Brick Bay Lodge is a proposed luxury visitor accommodation development at 17 Arabella Lane, Snells Beach, on the Matakana Coast north of Auckland. The project comprises approximately 45 accommodation suites together with resort amenities including reception and restaurant facilities, a wellness retreat, pool house and beach house. It will be situated on the coastal side of a property that has been developed over 40 years as the home of Brick Bay Wines and the Brick Bay Sculpture Trail. The project represents a greenfield equity foreign direct investment of approximately $390m (including $25m land), funded by international capital and designed to attract high-spending international visitors to New Zealand.

This report assesses the economic benefits of the project in support of a referral application under the Fast-Track Approvals Act 2024 (FTAA). It evaluates whether the project will deliver significant economic benefits at a regional or national level, consistent with the referral criteria at s22(2)(a)(iv) of the FTAA. The economic case is constructed to demonstrate that the significance threshold is met even on the most conservative assumptions.

The economic case is underpinned by four main categories of benefits:

- the scale of capital investment and associated construction activity;
- sustained operational expenditure and employment; the capture of international visitor spending as tourism export revenue;
- and a range of qualitative spillover benefits that are not easily quantified but are economically significant.

We appraise benefits over a 30-year horizon to 2055, and all figures are presented as Present Values (PV) [1] in 2026 prices using an 8% discount rate – in line with Treasury guidance.

The counterfactual for this project is that without the FTAA pathway, the development will not proceed, meaning the Foreign Direct Investment (FDI) will not enter New Zealand. Domestic visitor spending is excluded throughout on the basis that it would, in large part, be redistributed within New Zealand rather than created, and so is a transfer rather than a net impact. The gross value-added estimates are presented as a contribution measure rather than as net national welfare.

Construction-phase activity is substantial. Depending on cost scenario, construction is estimated to generate $317m – $376m in value added (GDP contribution). Construction will sustain 1,110–1,150 direct job-year equivalents, an average of 185–190 direct jobs per year over the build period, and 3,760 – 4,130 total job-year equivalents when indirect and induced employment effects are included.

Operational-phase activity will recur in each year after the lodge opens and is also reported as gross value added. Once fully operational, the lodge will incur annual operating expenditure of approximately $19m,

[1] Present Value (PV) shows the current value of future sums of money, calculated by applying a discount rate that reflects the time value of money.

substantially retained within the New Zealand economy. This sustains gross value added of $177m. Operations will contribute approximately 140 direct jobs per year, equivalent to more than 3 full-time roles per accommodation unit. These represent high-quality positions in a sector characterised by higher skill requirements and wage premiums relative to the hospitality average.

International visitor expenditure is an export earning which improves New Zealand's trade balance with the rest of the world[2]. Under conservative occupancy assumptions, annual revenue from international guests is estimated to be $17m – $27m at full capacity. This will generate GST of $3m – $4m per year, equivalent to $22m – $34m in PV terms. Ancillary spending by those visitors in the wider New Zealand economy is estimated to contribute a further $12m – $44m per year, equivalent to $104m – $364m in PV terms.

Beyond these quantified impacts, the project will generate economically significant spillover effects. Greenfield equity investment of this character produces the most favourable outcomes for host economies when it integrates with domestic supply chains, transfers knowledge and quality standards, and operates in a country with strong institutional and human capital conditions. New Zealand satisfies all of these conditions. The lodge will create sustained procurement demand across a wide range of domestic sectors, train staff to international standards and expose local suppliers to high quality protocols. Its high-profile positioning will generate destination branding benefits for the Auckland region and Matakana Coast, and the familiarity effect may facilitate future inward investment, which is particularly relevant given New Zealand's FDI stock sits 15 percentage points below the OECD median.

The project is directly aligned with multiple Government economic priorities. It advances the Going for Growth agenda's target of doubling New Zealand's exports within a decade. It supports Tourism New Zealand's objective of growing the value of tourism exports and is consistent with the Government Tourism Strategy's emphasis on increasing the unit value of tourism (growing value faster than volume). It also addresses an identified supply gap in luxury accommodation, particularly in proximity to Auckland, with an estimated addition of up to 20,560 visitor night per annum of high spending, high net worth international visitors.

No material adverse economic effects have been identified. The opportunity cost of the land is likely to be far below the value generated by development. Infrastructure demands are modest given the property already accommodates 35,000 – 40,000 visitors annually through the existing winery and sculpture trail operations.

On the basis of this assessment, the evidence supports a finding that Brick Bay Lodge will deliver significant economic benefits to New Zealand at both a regional and national level. The benefits are significant on multiple independent measures, most notably the scale of regional value added and the quantum of additional export earnings. Because the case is established even on the conservative occupancy assumptions adopted throughout, the standard that the project "will deliver" those benefits does not depend on the project achieving optimistic performance.

[2] The sums involved are not significant enough to affect exchange rates.

1 Introduction

1.1 Project Overview

The owners of 17 Arabella Lane, Snells Beach, propose to establish Brick Bay Lodge on the coastal side of their property. The lodge will provide luxury visitor accommodation comprising c45 accommodation suites and associated amenities. Accommodation will include a mix of villas, cottages and treehouses, supported by shared amenities which include a reception and restaurant building, pool house and gym, restoration pavilion, wellness retreat and a beach house.

The lodge will draw on the unique experience of the existing Brick Bay Wines and Sculpture trail, which has been developed on the inland side of the property over the past 40 years. The property is located 50 minutes' drive from downtown Auckland and approximately 1 hour 10 minutes from Auckland Airport.

1.2 Purpose and Scope

This report has been prepared to support a referral application under the Fast-Track Approvals Act 2024 (FTAA) by providing robust economic evidence on the project's benefits, costs and economic rationale. The assessment evaluates whether the project will deliver significant economic benefits at a regional or national level, consistent with the referral criteria under s22(2)(a)(iv) of the FTAA. The report adopts an economic impact assessment approach to quantify the effects of the development and matches that to the requirements of the FTAA framework, incorporating the latest project parameters, a literature review on foreign direct investment and tourism, and an explicit statutory assessment. Consistent with best practice, the report distinguishes between three categories of effect – gross value added (a contribution measure), net additional benefit (welfare relative to the counterfactual), and transfers (redistribution, excluded from net totals) – and defines the counterfactual against which additionality is assessed (Section 5.1). This avoids the conflation of gross activity with net benefit.

Because the project is under ongoing development, some parameters are subject to change. This report represents our analysis of the project using the most up-to-date information , as of 3 March 2026.

1.3 Approach

The assessment involves five stages of analysis.

1. We establish the statutory context under the FTAA and identify the relevant referral criteria.
2. We review academic and policy literature on Foreign Direct Investment (FDI) in tourism, considering domestic and international evidence to frame the mechanisms through which a project of this character generates economic benefits.
3. We examine the New Zealand tourism market context, the luxury accommodation segment and the FDI position within this.
4. We define the counterfactual against which the project's effects are assessed, and set out the basis on which each benefit stream is treated as additional, gross or a transfer.

5. We quantify the project's economic effects in three ways
    a. Input-Output analysis of construction and operational expenditure;
    b. Visitor expenditure analysis, estimating international guest ancillary spending; and
    c. A fiscal impact assessment of GST and local government rates.

   We also analyse qualitative effects where quantification is not viable, including supply chain spillovers, skills transfer and destination branding.

The report concludes with a statutory assessment and an overall evaluation of the project against the FTAA criteria.

1.4 Data Sources

The analysis draws on the following main sources:

- Project description and master plan (January 2026).
- Construction cost estimates from the developer's financial model and an independent Quantity Surveyor (QS) assessment.
- Operational and financial projections from the developer.
- Supply-use tables describing the inter-industry structure of the New Zealand economy.
- Tourism statistics published by Stats NZ.
- Tourism and MBIE data and publications.
- OECD data on FDI stocks.
- Academic literature on FDI, tourism and economic development.
- Industry sources and publications associated with the luxury accommodation sector.

1.5 Caveats and Limitations

The project is still at pre-construction feasibility stage. Construction cost estimates reflect typical planning-phase uncertainty. Quantitative findings are presented as indicative, with sensitivity analysis conducted where feasible. A conservative position is maintained throughout, with benefit estimates representing pessimistic outcomes. Caveats are discussed throughout the report alongside the analysis where they apply. Key limitations are listed below.

- Operational parameters by the developer have not been independently estimated or verified by Market Economics – they are taken as given and assumed to be reliable.
- The exclusion of corporate income tax due to uncertainty regarding business structures and future operating agreements.
- The exclusion of domestic visitor spending from benefit calculations on the basis that it might represent a transfer rather than net additionality.
- Residual uncertainty around visitor profiles, occupancy rates and trip characteristics.
- Input-Output analysis measures gross activity, not net welfare, and is subject to well-documented limitations which are acknowledged in section 5. We report the impacts accordingly.

1.6 Code of Conduct

The author of this report is **Tom Harris (BSc/MSc Economics)**, Senior Consultant at Market Economics. Tom has three years' experience at Market Economics, during which time he has carried out a number of economic assessments in support of FTAA applications. Prior to joining M.E, Tom worked in the UK Civil Service as an economist across a challenging portfolio of projects and sectors. During the Covid-19 pandemic he was the principal analyst in the Department for Education modelling the pandemic's impacts on Children's Social Care. His other roles included leading on graduate outcomes analysis, supporting high-profile national policy implementation, being embedded in the permanent secretary's office, and working closely with external academics and stakeholders. Tom has taught undergraduate economics at the University of Exeter and runs Good with Data, a New Zealand-based charity doing pro bono, data-led projects for charities.

Director approval and quality assurance has been provided by **Greg Akehurst (BA Geography/BCom. Economics)**, Director Market Economics, member of RMLA, and NZ Association of Economists. Greg has 30 years' experience in economic consulting, including 25 years as a Director of Market Economics Ltd. During this time, he has carried out numerous assessments of economic benefits and effects of developments and projects under the RMA, the COVID-19 Fast Track Act and the Fast Track Approvals Act 2024. With respect to aggregate, Greg has carried out economic studies including Kings Quarry Stage 2, Drury Quarry, Waihi North Mine, Waingaro Quarry and Belmont Quarry in Wellington. Greg has also acted as a peer reviewer for Councils and others on economic matters.

While this assessment and application is not before the Environment Court, this report has been prepared and reviewed in accordance with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023. Other than where it is stated that reliance is placed on the advice of another person, the author(s) confirm that the issues addressed in this report are within their area of expertise. The author(s) have not omitted consideration of any material facts known to them that might alter or detract from the opinions expressed.

2 Statutory Context

2.1 The Fast-Track Approvals Act 2024

The Brick Bay Lodge application is being advanced under the FTAA. The referral criteria under s22(2)(a) of the FTAA most directly applicable to this economic assessment are whether the project will deliver significant economic benefits at a regional or national level (s22(2)(a)(iv)).

2.1.1 Significance of Economic Benefits

The FTAA does not prescribe quantitative thresholds for "significant economic benefits". Significance is inherently contextual. The Waihi North panel confirmed that significance is an indication of scale and is not determined solely by whether regional or national GDP will change appreciably[3].

The Minister must be satisfied that the project *will deliver* significant economic benefits. This has two implications for the analysis. First, the evidence must support a finding at the level of confidence whereby the word *will* implies. We meet this by demonstrating that the significance threshold is met even under the most conservative assumptions. Second, the benefits must be characterised correctly, making clear what constitutes additionality. The analysis in Section 5 is structured to distinguish between each category.

In the context of Brick Bay Lodge, the significance of economic benefits is assessed with reference to the quantum of benefits, the project's alignment with national economic priorities, the quality and durability of the economic contributions and the extent of spillover effects that are not readily quantifiable. As demonstrated in the analysis, the economic benefits are significant on all of these dimensions.

2.2 Other Policy Alignment

2.2.1 Going for Growth

The Government's Going for Growth agenda (2025) targets a doubling of New Zealand's exports within ten years.[4] Tourism is explicitly identified as a sector with the capacity and potential to contribute to this objective. Brick Bay Lodge, designed to attract high-spending international visitors, is directly aligned with this ambition. The concentration of high-value visitors at a single facility generates not only direct export revenue but also ancillary economic activity that would not otherwise occur in the New Zealand economy.

2.2.2 Tourism New Zealand Strategic Priorities

In recognition of the sector's potential, Tourism New Zealand's Statement of Intent 2024 – 2028[5] explicitly targets export growth. Similarly, the Government Tourism Strategy (2019) has the objective of growing

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[3] Record of Decisions of the Expert Panel for Waihi North (18/12/2025)

[4] Going for Growth (Promoting global trade and investment) – MBIE

[5] Tourism-New-Zealand-Statement-of-Intent-2024-2028.pdf, Tourism New Zealand, page 4.

tourism value faster than volume[6]. This is essential for improving sector productivity and can help reduce the environmental intensity of tourism activity per dollar of economic benefit. The strategy also recognises that the tourism sector's productivity – measured by value added per employee – lags behind other sectors. Brick Bay Lodge is well aligned with this strategic direction: it is low-volume, high-yield accommodation which will generate substantial economic activity per worker and per guest night.

[6] New Zealand-Aotearoa Government Tourism Strategy (2019) – MBIE

3 Foreign Direct Investment and Tourism

This section reviews the academic and policy literature on the economic effects of Foreign Direct Investment (FDI), with particular focus on FDI in the tourism and hospitality sectors. The purpose is to establish the theoretical and empirical basis for how a project such as Brick Bay Lodge – which is funded by international capital and targeted at international visitors – can generate economic benefits for New Zealand.

3.1 FDI and Economic Growth

The theoretical case for countries to encourage inward FDI is well established. FDI can contribute to host-country economic performance through capital accumulation, technology and knowledge transfer, technical spillovers, supply chain development and competitive pressures on domestic firms. However, the academic literature suggests that outcomes can be mixed and are dependent on the nature of FDI and conditions in the host country. This section focuses primarily on research from the World Bank into this link, particularly a 2023 Working Paper from Bénétrix et al. (2023), which scrutinised the relationships between FDI and growth[7].

In summary, there tends to be a positive and statistically significant correlation between FDI and growth for countries with sufficiently well-developed financial sectors or high levels of human capital, but no correlation for less developed countries. New Zealand's institutions mean it is in the category of economies where the complementary conditions are satisfied, suggesting FDI should facilitate growth.

Numerous studies have demonstrated productivity spillovers in host countries, particularly through backward linkages in the supply chain. When FDI involves sourcing intermediate goods and services from domestic suppliers, it can provide a GDP boost and expose the suppliers to higher standards of quality, reliability and operational practice[8]. These effects can diffuse through the local supply network.

The OECD's FDI Qualities Policy Toolkit (2022)[9] highlights that foreign firms are more likely to offer formal training opportunities, invest in R&D, and incorporate environmental issues in their strategic objectives. It also finds that foreign firms' operations also have spillover effects on domestic businesses arising from value chain relationships between foreign and domestic firms, market interactions through competition and imitation effects, and labour mobility of workers. Greenfield projects in OECD countries generate 3 direct jobs per USD $1 million invested, with labour-intensive sectors generating significantly more.

[7] The Elusive Link Between FDI and Economic Growth – Bénétrix et al. (2023). World Bank Policy Research Working Paper.
[8] Does Foreign Direct Investment Increase the Productivity of Domestic Firms? In Search of Spillovers Through Backward Linkages – Beata Smarzynska Javorcik (2004). American Economic Review, 94(3), 605–627.
[9] FDI Qualities Policy Toolkit – OECD (2022)

3.2 Tourism FDI

Tourism FDI is structurally distinct from FDI in other sectors. It can encompass a range of activities, such as accommodation and transport infrastructure, tour operation and food and beverage services. Whereas FDI in extractive industries or advanced manufacturing typically concentrates capital and employment within a single facility or supply chain, tourism is more likely to disperse activity across sectors. The OECD estimates that every $1 of tourism exports generates 89 cents of domestic value added, with 56 cents coming directly and 34 cents from indirect impacts – i.e., due to supply chain linkages[10].

Accommodation accounts for the majority (59%) of greenfield tourism FDI projects globally, making hotel and resort construction the primary way foreign capital enters host countries[11]. These arrangements involve significant commitments, including construction programmes, and embed investors in the local supply chain. Non-equity arrangements (management contracts and franchise agreements etc.) involve much less.

Multinational hotel chains have overwhelmingly preferred non-equity modes of FDI[12]. The visible presence of hotel chains can therefore significantly overstate the foreign capital actually committed to host countries[13]. Committing equity capital, as is the case with Brick Bay Lodge, represents a deeper economic engagement than typical tourism FDI.

In addition to being a source of FDI, tourism also facilitates the attraction of future FDI flows[14]. Tourism is a location-specific determinant of FDI, which can create a positive feedback loop, and means that projects are not static[15]. International visitors who experience a country's environment, market conditions and quality of life might subsequently invest in the economy. This means that high-value tourism not only captures visitor spending but also acts as an advert for the host country's investment potential to potential future investors. This means that increasing New Zealand's Luxury Tourism appeal generates disproportionate benefits to the economy.

3.2.1 Luxury Tourism

The luxury tourism market exhibits many of the best features of tourism FDI for host countries identified above. Despite luxury tourists constituting a small share of total arrivals, their per-visitor and per-night economic contribution is disproportionately large. High-end tourists in Europe spend 8 times more per day than the average[16]. Comparing accommodation structures of equivalent scale, high-end accommodation also has 2 times as many employees[17].

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[10] Tourism Trends and Policies 2020 – OECD

[11] Tourism Investment Report – UN Tourism (2022)

[12] Foreign Direct Investment in Tourism: Flows and Volumes – Endo (2006)

[13] FDI in Tourism: The Development Dimension – United Nations Conference on Trade and Development (2007)

[14] Investment in familiar territory: Tourism and new foreign direct investment – Sandford (2000)

[15] The Relationship between Foreign Direct Investment and Tourism: Empirical Evidence from China – Tang et al. (2007)

[16] High-end Tourism: a strong driver for Europe – European Cultural and Creative Industries Alliance (2022, report by Bain & Company)

[17] Ibid

Fortune Business Insights, a market research provider, projects the global luxury travel market to grow at 8.7% per year in the decade to 2034[18]. This reflects an expanding global affluent class and sustained post-pandemic preference for luxury travel. Capturing some of this demand offers potential for high economic rewards.

Luxury tourism should also yield good knowledge transfer benefits. Staff are trained to international standards, suppliers are held to explicit quality protocols, and many other advantages are transferred to staff or suppliers who might then apply those standards across New Zealand.

3.3 Application to Brick Bay Lodge

The literature establishes that tourism FDI generates the strongest positive outcomes when it involves greenfield equity investment, integrates with domestic supply chains, transfers knowledge and quality standards to local firms, and operates in a host country with the institutional and human-capital conditions to absorb those benefits. Brick Bay satisfies all of these conditions. In addition to being an addition to New Zealand's accommodation stock, it will boost the country's export base and productive capacity within the tourism sector. The project is an example of greenfield equity FDI, and involves a large capital commitment to New Zealand. Given New Zealand's meagre FDI stock as a proportion of GDP – which is examined in detail in Section 4 – investment of this scale is significant. The Lodge will generate procurement demand across a wide range of domestic sectors and integrate well into established supply chains.

[18] Luxury Travel Market Size – Fortune Business Insights (accessed 04/03/2026)

4 Market Context

4.1 New Zealand Tourism

As detailed in Section 2.2, the Government has a target to double the value of New Zealand's exports in 10 years (by 2034).[19] Tourism is New Zealand's second largest export sector[20]. In the year to March 2024, the sector contributed 7.5% of total GDP through direct tourism-related activity and supply chain effects.[21] International tourism accounted for 17.2% of New Zealand's total exports, second only to dairy products by value.

The sector employs 183,000 people directly and a further 121,000 indirectly, which makes up 11% of total employment[22]. However, value added per employee lags behind other sectors, and a focus of the most recent Government tourism strategy was to grow value faster than volume[23].

4.2 The Luxury Accommodation Market

New Zealand's luxury lodge sector is small by international standards. Established properties include Huka Lodge (Taupō), Blanket Bay Lodge (Queenstown), The Lindis Lodge (Omarama) and a limited number of others. The sector is concentrated in the South Island, with limited luxury lodge capacity proximate to Auckland, despite Auckland being the entry point for a large share of international tourists.

Analysis by Horwath HTL suggests that luxury room supply in New Zealand remains constrained, particularly relative to the global growth trajectory of high-end tourism accommodation[24]. Brick Bay Lodge would partially address this supply gap. Its proximity to Auckland provides direct access to ancillary spending opportunities not available to more remote luxury properties, which has the added potential of increasing benefits to other parts of the economy beyond the lodge.

4.3 Foreign Direct Investment in New Zealand

New Zealand's FDI stock stands at 35% of GDP (2024), ranking 10th lowest among 36 OECD countries and 15 percentage points below the OECD median (50%).[25] This is a significant shortfall. New Zealand is in the bottom third of advanced economies for attracting international investment, constraining the productivity gains that flow from FDI. This increases the relative importance of proposals of Brick Bay's scale.

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[19] Going for growth, February 2025 (Promoting global trade and investment) – MBIE

[20] Tourism satellite account: Year end March 2024 – Stats NZ (Table 2). *Based on selected primary export product groupings.

[21] Tourism satellite account: Year end March 2024 – Stats NZ (Table 1)

[22] Tourism satellite account: Year end March 2024 – Stats NZ (Table 6) and Total employment from Market Economics BD deluxe (2,817,000)

[23] New Zealand-Aotearoa Government Tourism Strategy (2019) – MBIE

[24] New Zealand Hotels and Chains Report – Horwath HTL (Hotel, Tourism, Leisure). 2023

[25] Foreign Direct Investment Stocks – Direct principle inward. OECD (2024)

5 Economic Effects

5.1 The Counterfactual and Treatment of Effects

5.1.1 Gross, net and transfer effects

The economic effects of a project can be measured on several different bases, and these are not always interchangeable. Adding them together can overstate net contributions and cause misunderstandings. This assessment classifies every quantified effect into one of three categories and reports each on its own basis. The three categories are summarised below.

- Gross value added and employment impacts. This measures the scale of economic activity – direct, indirect and induced – supported by the project's expenditure, modelled through an Input-Output framework. It demonstrates how large the activity is, not how much better of New Zealand is as a result. This is because a share of capital, labour and materials is likely to be displaced from elsewhere. Gross value added is directly relevant to the FTAA significance test. It is not, however, a measure of net welfare, so is not summed with net or transfer measures.

- Net additional impacts. This is the gain to New Zealand relative to the counterfactual: what would happen without the project. These impacts are divided between benefits, which are unambiguous welfare gains and impacts, which are contributions to other measures and objectives, such as the Government's tourism-export goals.

- Transfers. A redistribution of resources between New Zealanders. For example, spending by domestic visitors, GST on domestic visitor sales and rates payments move resources between parties but are not a net creation of new resources. Including them double counts the underlying activity that is already measured in the value added analysis. Transfers are reported separately and excluded from net totals.

5.1.2 The Counterfactual

Net effects can only be assessed against a counterfactual – what would happen if the project does not proceed. We adopt the following counterfactual: absent the FTAA referral and the approvals it enables, the development does not proceed in its proposed form within a timeframe relevant to this assessment, and the associated foreign direct investment is not committed to New Zealand. The capital is understood to be project-specific (Section 3); the site is a single owner-controlled holding with no comparable consented alternative use of similar value; and the luxury lodge sector proximate to Auckland is supply-constrained (Section 4.2), such that equivalent and substitutable capacity is not otherwise being delivered by the market.

Spending on land acquisition, consenting and pre-construction costs are considered foregone and hence excluded from any effects modelling.

5.1.3 Effect Classification

Table 1 shows the classification of different effects considered in the analysis. The inward FDI and export earnings that the lodge generates are net additional, whereas domestic visitor expenditure is a transfer (displacement) of activity that would otherwise have occurred elsewhere in New Zealand. Treating all domestic visitor expenditure as a transfer is deliberately conservative.

Table 1 - Classification of Effects and Additionality Basis

Effect	Measure	Treatment	Additionality basis
Construction activity	Gross value added	Scale and contribution indicator	Partially additional; opportunity cost of resources acknowledged
Operational activity	Gross value added	Scale and contribution indicator	Recurring scale indicator
International visitor on-site expenditure	Export earnings (gross receipts)	Net additional impact	Additional export income not accruing in the counterfactual; not additive with operational VA
GST on international on-site expenditure	Fiscal receipt	Net additional benefit	Accrues to the Crown; would not arise in the counterfactual
International visitor ancillary expenditure	Export earnings	Net additional benefit	Additional export income not accruing in the counterfactual
Domestic visitor expenditure (on-site and ancillary)	Non-export expenditure	Transfer	Mostly redistributed within New Zealand in the counterfactual
GST on domestic sales; local government rates	Fiscal receipts	Transfer	Redistribution within New Zealand; excluded from net totals to avoid double counting or conflation with value added
Spillovers (skills, supply chain, branding)	Qualitative	Net additional (unquantified)	Conservatively omitted from quantified totals

The assessment uses a mixture of analytical techniques to quantify impacts across the construction and operational phases. Three approaches are employed, with omissions and other considerations such as spillovers discussed qualitatively. Each is mapped to the classification above.

- **Input-Output analysis**: This quantifies the value added and employment effects attributable to the construction and operational spending by Brick Bay Lodge. The outputs are gross value added, not a net benefit to New Zealand. Although the inward FDI and hence project would not occur in the counterfactual, the build and ongoing activities use capital and labour that aren't lying idle, they have an opportunity cost. Additionality is partial.
- **Visitor expenditure analysis**: We estimate the on-site and ancillary spending by visitors. Three estimation methods are used to test sensitivity and in recognition of the residual uncertainty around visitor profiles or trip outcomes. International visitor expenditure is included as a net

additional benefit. Domestic visitor spending is quantified but excluded because it constitutes a transfer within New Zealand.

- **Fiscal impact assessment**: as well as the taxes paid on Brick Bay expenditure quantified through the Input-Output analysis, we calculate GST on the goods sold plus local government rates on the property's capital value. Corporate income tax is excluded due to uncertainty regarding margins and operating practices. There will also be rental payments to the villa owners, which will incur income tax (or equivalent) in New Zealand. Again, because of uncertainties, these are not quantified for this report and are discussed qualitatively instead. Tax income is a transfer not a net benefit. GST on goods sold and the portion of international visitor income used to pay rates are already captured in the visitor expenditure analysis.

Within the Input-Output analysis, effects are classified as:

- **Direct:** on site activity generated by construction expenditure and lodge operations;
- **Indirect:** supply chain effects arising from the purchase of intermediate goods and services by direct suppliers; and
- **Induced:** household spending effects from employee incomes.

All costs and values are presented as real values in 2026 prices, in line with New Zealand Treasury guidance. The appraisal period used is 30 years from 2026 – 2055. Timings align with those assumed in the developer's financial models, with construction commencing in 2027, the lodge opening in 2029 and the final units being finished by 2031. Effects are discounted using an 8% discount rate, consistent with Treasury guidance for commercial projects. A 2% discount rate is also used for sensitivity analysis.

5.1.4 Feasibility of Alternative (Cost Benefit) Analysis

This assessment quantifies and characterises the project's economic benefits to New Zealand – it does not attempt a full Cost Benefit Analysis (CBA). A CBA would assess whether a project improves national welfare by weighing all benefits to New Zealand against all costs to New Zealand, reduced to a single net figure or benefit-cost ratio. Section 22(2)(a)(iv) asks whether the project will deliver significant economic benefits at a regional or national level. This has been confirmed by panel findings, stating that significance is an indication of scale rather than a test of whether national GDP changes appreciably.

Constructing a proper CBA would require quantifying, disaggregating and monetising the full set of costs and benefits, much of which falls to other technical experts. As defined in the FTAA, these are weighed against the project's benefits through the proportionality assessment under s85(3) at the substantive application stage, by the Panel appointed by the EPA. It would also require monetising effects that cannot be reliably estimated (corporate tax, rental distributions and margins depend on an ownership structure not yet settled) and others that are real but not monetisable (skills transfer, supply-chain capability, destination branding along with the environmental, social and cultural impacts).

The approach adopted is designed to address the purpose of the FTAA. Each effect is classified into one of three categories: gross value added (a contribution to GDP); net additional impacts (relative to the counterfactual); and transfers (redistribution, excluded from net totals). These are reported on their own basis against the counterfactual defined above. This is conservative and transparent, enabling a conclusion that the benefits to New Zealand are significant and will be delivered.

5.2 Project parameters

Table 2 shows the proposed components of the facility and indicative specifications.

Table 2 - Buildings and Facilities Summary

Component	Units	Floor Area (approx. sqm)	Key Features
Large Villas	22	300	Private pools, ocean views, concierge service, four bedrooms
Cottages	15	175 - 200	Garden setting, two bedrooms
Treehouses	8	100	Minimalist eco-design for wellness retreats
Central and Resort Facilities	—	4,158	Wellness Retreat; Restoration Pool; Reception, Food and Beverage; Pool House; Beach House

5.3 Construction-Phase Impacts

As the project is still in pre-construction feasibility stage, construction cost estimates reflect typical planning phase uncertainty. We model two scenarios based on independent preliminary cost assessments:

1. Financial Model (FM) assessment: The developer's internal projections of the total project costs; and
2. Quantity Surveyor (QS) assessment: Cost estimates by an independent QS, adjusted to reflect updated project parameters.

These scenarios determine the inputs used to "shock" the Input-Output (I-O) model as they represent spending by the lodge on construction activities. Table 3 summarises the high-level differences between the two estimates. Part of the divergence is due to how costs are recorded between spend items. Land acquisition costs are not modelled through the I-O framework in either scenario. The effects in this section are reported as gross value added, a measure of activity supported, rather than as net national benefits. Only value added and employment retained in New Zealand is counted. Imports and other leakages are excluded from the model.

Table 3 – Construction Cost Estimates

Item	QS	FM
Accommodation	$151m	$218m
Amenities and Site Works	$80m	$70m
Professional Fees and Contingency	$85m	$55m
Consent and Planning	$2m	$7m
Land Purchase	$25m	$25m
Total less Land Costs	$318m	$350m

The cost estimates are mapped to individual economic sectors based on the description of activities so that they can be run through an I-O model. All spending is assumed to occur in Auckland, and the staging of works is aligned with the FM scenario. Construction is assumed to commence in 2027 and conclude by the end of 2031[26].

The model estimates gross value added from construction of between $317m and $376m when discounted at 8%, rising to $380m - $422m when discounted at 2%. All of this value added is retained within New Zealand. The direct value added ($81m - $88m) accrues entirely to Auckland, as does between 77% and 88% of indirect and induced value added, with the remaining shares mostly captured within the North Island. The divergence between the QS and FM scenario estimates is largely due to the different sectors in which spending is allocated. This highlights the sensitivity within IO models to how inputs are assigned. Because construction expenditure is concentrated in a short window (2026 – 2031), the choice of discount rate has a negligible impact on the results. Table 4 shows the estimated gross value added impacts, as well as sensitivity analysis using a 2% discount rate.

Table 4 - Construction Phase Value Added Estimates

		Value Added (NZ$ million)							
		8% Discount Rate				2% Discount Rate (Sensitivity Test)			
Scenario	Region	Direct	Indirect	Induced	Total	Direct	Indirect	Induced	Total
QS	Auckland Region	81	117	79	277	97	140	95	332
	Rest of North Island	0	12	17	29	0	15	20	35
	Rest of New Zealand	0	4	7	11	0	5	8	13
	Total	81	133	103	317	97	160	123	380
FM	Auckland Region	88	146	92	326	98	164	104	366
	Rest of North Island	0	16	20	36	0	18	23	41
	Rest of New Zealand	0	6	8	14	0	6	9	15
	Total	88	168	120	376	98	188	136	422

[26] Some costs associated with construction are allocated to 2026, such as spending on scientific and professional services, though physical work is not expected to take place until 2027

Employment estimates are expressed in job year equivalents using a Modified Employment Count (MEC), which captures employees, self-employed people and working proprietors. Construction is estimated to sustain 1,110 – 1,150 direct job year equivalents, all based in Auckland, averaging 185 – 191 jobs per year over the six-year construction period. Including indirect and induced effects, total employment rises to 3,760 – 4,130 job year equivalents, which averages to 610 – 623 jobs per year over the construction period. All jobs will occur within New Zealand, and of these, all direct jobs will be in Auckland. Between 75% and 90% of indirect and induced employment will be based in Auckland, with 7% – 16% in the rest of the North Island, and just 1% – 3% in the South Island.

Table 5 - Construction Phase Employment Estimates

		Employment (Years)			
Scenario	Region	Direct	Indirect	Induced	Total
QS	Auckland Region	1,110	1,466	764	3,340
	Rest of North Island	0	118	164	282
	Rest of New Zealand	0	51	84	135
	Total	1,110	1,635	1,012	3,757
FM	Auckland Region	1,148	1,698	816	3,662
	Rest of North Island	0	140	179	319
	Rest of New Zealand	0	58	91	149
	Total	1,148	1,896	1,086	4,130

5.4 Operating-Phase Impacts

Lodge operations will generate ongoing economic activity through procurement of goods and services, marketing, maintenance, professional services and an array of other costs as they host international visitors. Expenditure is incurred predominately within New Zealand. Only value added and employment retained in New Zealand is counted. Imports and other leakages are excluded from the model.

Lodge operating costs are forecast to begin at $11.9m per year (2026 prices) when the lodge opens in 2029 and rise to $18.8m (2026 prices) once the construction of all accommodation is complete and the lodge is fully open in 2032.

The operational spending impacts are modelled to recur in each year until 2055, the final year of the appraisal period. This extended horizon amplifies the effect of discount rate selection relative to the construction phase impacts. The model estimates gross value added from the lodge's operations of $177m at an 8% discount rate, rising to $397m at 2%. As with construction, all reported value added is retained within New Zealand. Direct value added accrues entirely to Auckland. Of the indirect and induced value added, between 76% and 79% is captured in Auckland, 15% – 17% in the rest of the North Island, and 5% – 6% in the South Island.

Table 6 - Operational Expenditure Value Added Estimates

	Value Added (NZ$ million)							
	8% Discount Rate				2% Discount Rate			
Region	Direct	Indirect	Induced	Total	Direct	Indirect	Induced	Total
Auckland Region	67	41	44	152	152	92	99	343
Rest of North Island	0	8	10	18	0	18	22	40
Rest of New Zealand	0	3	4	7	0	6	8	14
Total	67	52	58	177	152	116	129	397

Operations are estimated to sustain 3,576 direct job year equivalents over the operational period to 2055, all in Auckland. This is equivalent to 138 direct jobs per year. Including indirect and induced effects, total employment is 6,311 job-year equivalents – 242 per year on the same basis.

Table 7 - Operational Expenditure Employment Estimates

	Employment (Years)			
Region	Direct	Indirect	Induced	Total
Auckland Region	3,576	1,103	1,036	5,715
Rest of North Island	0	180	225	405
Rest of New Zealand	0	76	115	191
Total	3,576	1,359	1,376	6,311

5.5 International Visitor Spending

International visitor expenditure is a net export benefit to New Zealand. Domestic spending is excluded from the benefit calculations because, in the absence of Brick Bay Lodge, it is likely that guests would spend equivalently on goods and services within New Zealand, perhaps by staying at luxury accommodation elsewhere or increasing discretionary spending.[27] Under these assumptions, spending at Brick Bay Lodge would be a transfer. If instead they would opt for an international trip, our analysis omits the benefits from domestic visitors. However, it is equivalently true that international guests might travel elsewhere in New Zealand in the absence of Brick Bay, though the unique offering at the lodge make this eventuality less likely. We cannot elicit potential travellers' exact preferences at this stage. Therefore, domestic visitors' spending is omitted from consideration of benefits to be conservative, representing true additionality rather than redistribution.

Two scenarios test the sensitivity of outputs to occupancy rates and international visitor composition.

[27] Domestic guests will contribute to sustaining the business and therefore generating the operating costs which we have calculated above.

- **Scenario 1 (Conservative)** applies downside occupancy projections from the developer's financial modelling. International visitors are assumed to comprise 62% of total guests, which is imputed from the trend observed 1999 – 2009 for luxury accommodation in New Zealand.[28]
- **Scenario 2 (Industry Benchmarks)** applies average occupancy rates for luxury accommodation and boutique lodges in Auckland (48%) to the c50 hotel rooms in the nightly rental pool.[29] Due to nuances with the villa rental subset, this occupancy is assumed to remain at half of that level. International visitors comprise 80% of total guests based on industry intelligence from comparable facilities.

Table 8 summarises key assumption values and modelling parameters. Occupancy rates and revenue proportions change over time as the development scales up to full capacity. Guests per room are based on New Zealand averages, however these tend to be higher for luxury lodges, meaning the total guests might be an underestimate. This suppresses our estimates of downstream benefits such as ancillary spending per guest.[30]

Table 8 - Visitor Spending Modelling Assumptions

Assumption Input	2029	2032
General Assumptions		
Guests per Room	1.70	
Accommodation Revenue Share	35%	67%
Shorter Stay Villas Nightly Rate per Room (2026 prices)	$1,885	
Longer Stay Villas Nightly Rate per Room (2026 prices)	$942	
Scenario 1 - Conservative		
Occupancy - Shorter Stay Villas	25%	43%
Occupancy - Longer Stay Villas	15%	15%
International Guest Share	62%	
Scenario 2 - Industry Benchmark		
Occupancy - Shorter Stay Villas	25%	48%
Occupancy - Longer Stay Villas	15%	24%
International Guest Share	80%	

Table 9 contains annual guest volumes and revenue estimates. International guest numbers are calculated by applying the international visitor share to total guests (based on the scenario occupancy assumptions and available rooms). Revenue from international guests is proportional to their guest share.

[28] "If you build it they will come" or will they? A review of travel motivation theory - Brocx & Harkinson (2009) via Reflecting on moving forward: luxury hospitality in New Zealand post-COVID-19 – Tracy Harkinson (2023)

[29] Tourism New Zealand Dashboard. Value for YE 2025

[30] South Wairarapa District Council Strategy Working Committee.

Table 9 – Brick Bay Revenue Estimates

Value	2029	2030	2031	2032
Scenario 1 - Conservative				
Average Nightly Total Guest Count	18	30	45	55
Average Nightly International Guest Count	11	19	28	34
Brick Bay Revenue	$15.5m	$18.8m	$22.7m	$27.4m
Revenue from International Guests	$9.6m	$11.6m	$14.1m	$17.0m
Scenario 2 - Industry Benchmark				
Average Nightly Total Guest Count	18	33	53	70
Average Nightly International Guest Count	14	26	43	56
Brick Bay Revenue	$15.5m	$20.2m	$26.0m	$33.4m
Revenue from International Guests	$12.4m	$16.1m	$20.8m	$26.7m

Revenue from international guests is a tourism export and is net additional to New Zealand. This earning is reported separately from, and is not additional to, the value added by the lodge's operations. The two activities are overlapping. Value added measures the domestic production supported by the lodge's operations, while the export revenue earned will fund part of those operations.

The GST component of this revenue is a net additional benefit to New Zealand. There is no offsetting cost of supply for the Government. Table 10 shows the PV of International Guest Revenue over the appraisal period. We estimate that international revenue of $148m – $227m will enter New Zealand. Much of this will subsequently circulate in the New Zealand economy through the operational spending measured above. There will also be rental distributions to villa owners and/or the operating entity. This will be taxed, representing another additional fiscal channel. However, due to uncertainty around how that will be configured, we have not estimated those impacts here.

Table 10 - Revenue from International Guests (Present Value)

Value	Treatment	8% Discount Rate	2% Discount Rate (Sensitivity Test)
Scenario 1 - Conservative			
Revenue from International Guests	Net additional impact	$147.7m	$331.0m
GST component of International Guest Revenue	Net additional benefit	$22.2m	$49.6m
Scenario 2 - Industry Benchmark			
Revenue from International Guests	Net additional impact	$227.4m	$503.3m
GST component of International Guest Revenue	Net additional benefit	$34.1m	$75.5m

International visitors will generate economic benefits beyond their spending at the Lodge. We define their ancillary spending as anything not recorded as revenue by Brick Bay. This includes the cost of transport, activities, attractions, food and beverage services and retail. The extent of benefit to New Zealand businesses is determined by the volume and composition of this expenditure. Three methods are used to estimate this quantum.

- **Method 1 – Average Daily Spend of Airbnb guests**. A study by Oxford Economics found that non-accommodation spending by Airbnb guests was $380 per day in 2024.[31]
- **Method 2 – Highest Decile Trip Residual**. A 2019 release from the International Visitor Survey lists average trip spend and average trip duration for high-spending visitors, classified by the researchers as those in the top 10% of daily spend.[32] Accommodation costs at Brick Bay subtracted from this value gives an estimate of potential per visitor spending. This captures the spending propensity of wealthy visitors but may not fully reflect Brick Bay's specific guest profile.
- **Method 3 – Non-accommodation spend share.** Tourism New Zealand releases market insights for visitors from different countries. The latest insights reveal that UK visitors spend 25% on accommodation and 5% on food and beverage services, on average.[33] Visitors from the USA spend 20% on accommodation and 10% on food and beverage services.[34] Using 30% as an assumed share of spend that will take place at Brick Bay, additional spending can be calculated from the accommodation spend estimates.

All of the approaches are uncertain and imperfect proxies. Brick Bay guests will have much more spending power than average Airbnb guests, but on-site amenities may retain guests and therefore constrain further spending. Proximity to Auckland may increase spending opportunities relative to other remote lodges, though transport costs might be lower. Trip duration and unique itineraries introduce further potential for variability. Estimates from Method 3 are distorted by visitors camping or freedom camping, causing accommodation to comprise a small share of total costs. Propensity to spend outside accommodation also varies significantly by location (and proximity to spending opportunities), guest type and the accommodation itself. Method 2 is considered the most robust, though is considered very conservative because Brick Bay's guests will have deeper pockets than the cohort analysed in the IVS. We therefore also analyse the non-accommodation spend share for the industry benchmark input assumptions, too.

Table 11 presents the annual ancillary spending estimates using the three methods under both occupancy scenarios. Method 1 results in the lowest estimates: $4.7m - $7.8m from 2031 based on occupancy scenario. Method 2 suggests $12.4m - $20.5m annually and Method 3 suggests $26.7m - $44.2m, highlighting the differences between inputs.

[31] Airbnb's impact in New Zealand – Oxford Economics (2025) via Airbnb
[32] Higher-spending visitors in the IVS – MBIE (2019)
[33] United Kingdom Visitors and Market Insights – Tourism New Zealand (2025)
[34] USA Visitors and Market Insights – Tourism New Zealand (2025)

Table 11 – International Visitor Ancillary Spending (Spending in the Economy Outside of Brick Bay)

Method Used for Calculation	2029	2030	2031	2032
Scenario 1 - Conservative				
Average daily spend of Airbnb guests	$1.5m	$2.6m	$3.9m	$4.7m
Highest spend decile trip residual	$4.0m	$6.8m	$10.1m	$12.4m
Non-accommodation spend share	$8.5m	$14.7m	$21.8m	$26.7m
Scenario 2 - Industry Benchmark				
Average daily spend of Airbnb guests	$1.9m	$3.7m	$5.9m	$7.8m
Highest spend decile trip residual	$5.1m	$9.6m	$15.5m	$20.5m
Non-accommodation spend share	$11.0m	$20.7m	$33.5m	$44.2m

Table 12 shows the present value of net additional benefits from international visitor ancillary spending over the appraisal period. Using the conservative occupancy and international share inputs with the highest spend decile's trip residual method gives a spending estimate of $104m. Using the industry benchmark occupancy inputs with the trip residual and non-accommodation spend share assumptions gives $169m – $364m. The large range is partially reflective of how unique this market segment and its guest are. It also highlights the differences in triangulation methods. Even the upper estimate does not represent a theoretical upper bound. The industry benchmark occupancy assumptions could easily be exceeded and guests could spend more than proxy averages do elsewhere in New Zealand.

Table 12 - International Visitor Ancillary Spending (Present Value)

Ancillary Spending Method	8% Discount Rate	2% Discount Rate (Sensitivity Test)
Scenario 1 - Conservative		
Highest spend decile trip residual	$104.0m	$231.8m
Scenario 2 - Industry Benchmark		
Highest spend decile trip residual	$168.8m	$379.5m
Non-accommodation spend share	$363.6m	$817.3m

5.6 Fiscal Impacts

This section sets out the fiscal impacts of the proposed development. GST on international visitor spending – both on-site at Brick Bay and through ancillary spending in the wider economy – is already reported in Section 5.5 as a net additional benefit. It is not repeated here to avoid double counting.

GST on spending by domestic visitors is a transfer between New Zealanders and is excluded from our analysis.

The site will pay local government rates, estimated at $980,000 per year once fully operational, based on an estimated capital value of $338m (derived from the land purchases and a proportional return on construction expenditure). Rates are a transfer between Brick Bay and Auckland Council, so are not treated as additional.

Two further fiscal flows are additional but have not been quantified at this stage. Their omission is deliberately conservative. Corporate income tax on the operating entity will accrue to New Zealand and is expected to be a significant fiscal benefit. It has been excluded for now given uncertainty over how the operating and ownership structures will be set up. Importantly, not all post-rental income will be repatriated out of the country.

5.7 Qualitative Effects and Spillovers

Beyond the quantified impacts, Brick Bay Lodge will generate a range of economically significant effects that are not easily quantified or expressed in monetary terms.

5.7.1 Skills Transfer and Labour Market Effects

There are possible positive distributional effects. 45% of hospitality workers' highest qualifications was a high school certificate or below[35]. The lodge will require a workforce trained to international luxury standards, enabling workers to upskill. This is consistent with the FDI literature findings that FDI in tourism pays higher wages and invests more in development than domestically owned equivalents.

There is also high job satisfaction in the sector (72% of workers report enjoying their work), so work is likely to be rewarding for those employed relative to alternatives.

5.7.2 Destination Branding and Familiarity Effects

High-profile developments such as Brick Bay Lodge will generate media coverage, travel industry recognition and hype among a key demographic targeted by New Zealand tourism. This effect is not limited to the lodge. Matakana and Auckland region will benefit from visibility from visitors who might otherwise skip the area.

The familiarity effect is self-reinforcing: international visitors gain knowledge of New Zealand's investment environment and commercial opportunities. Given New Zealand's low FDI stock, converting tourism into subsequent investment could be significant.

5.7.3 Supply Chain Effects

The lodge has operational requirements that will create sustained demand for premium goods and services such as wine, high-end food, specialist landscaping etc. This boosts upstream economic activity and incentivises local producers or contractors to develop products to a higher standard. These effects would not be captured by the IO model because they represent improvements in supplier capability rather than being additional output.

[35] Hospitality and Tourism Report 2024 – MBIE

5.7.4 Cultural and Community Benefits

The collaboration with Ngāti Manuhiri allows cultural heritage at Brick Bay to be celebrated, including a notable Pā site on the property. The Brick Bay Wines and Sculpture Trail already plays an important role in fostering the next generation of New Zealand fine artists. The lodge will extend this cultural contribution by providing an international audience for exhibitions. These cultural dimensions are not easily quantified but are an important aspect of the project's contribution.

5.8 Costs and Trade Offs

This assessment has considered a range of other effects including:

- **Opportunity costs.** The alternative uses of capital are not considered. In the absence of Brick Bay, investor capital would not enter New Zealand. However, there are opportunity costs for the land, though the economic value of the Brick Bay Lodge proposal is likely to be an order of magnitude higher than realistic alternatives at this stage.
- **Infrastructure and Service Demand.** Increased visitor volumes will have costs on local infrastructure and public services. Despite the number of visitors being lower than other accommodation types, there is still an effect. Notably however, Brick Bay already admits 35,000 – 40,000 people to the winery, sculpture path and other on-site attractions. This is equivalent to 96 – 110 people per day. Using the occupancy assumptions above, the lodge would increase daily visitors by 50% - 73% (depending on occupancy assumptions and whether visitor numbers are closer to 35k or 40k).[36]
- **Environmental and Amenity Costs.** Development impacts landscapes, ecology, traffic and local amenity. These are considered by other technical experts.

5.9 Economic Impacts Summary

The economic effects covered in this assessment are consolidated in Table 13. All dollar values are presented in 2026 prices. Each effect is reported on its own basis and, for the reasons set out in Section 5.1, the categories are not summed into a single headline figure. They are measured on different, non-additive bases.

The gross economic activity (Panel A) measures the scale of economic activity supported by the project's construction and operational expenditure. We estimate that the construction stage will generate value added of $317m – $376m at an 8% discount rate ($380m – $422m at 2%), and operations a further $177m ($397m at 2%), giving a combined impact of $494m – $553m at 8% ($777m – $819m at 2%). This is a contribution measure, directly relevant to the significance test under the FTAA. It is not a measure of net

[36] Visitors are not uniformly spread throughout the week. At weekends, the site receives many more visitors, meaning that guests at the lodge will comprise a smaller share. During the week, guests will bring the total levels closer to the current weekend attendance.

welfare – the capital, labour and materials mobilised carry opportunity costs – and is reported as a gross impact rather than as a net gain.

Employment (Panel B) is sustained by the spending on both construction and operations. We estimate that the construction will support 3,757 – 4,130 job-year equivalents over the build, of which 1,110 – 1,148 are direct. Total jobs supported will average out to 626 – 688 jobs per year over this period. Operations sustain 6,311 job-year equivalents over the appraisal period – approximately 243 jobs per year, 138 of them direct – for the life of the facility.

The net additional benefit to New Zealand is driven by international visitor spending (Panel C). At full capacity, Brick Bay Lodge is estimated to earn \$17m – \$27m per year in revenue directly from international guests, with a present value of \$148m – \$227m at 8% (\$331m – \$503m at 2%). Because this demand is foreign-sourced, this money would not enter New Zealand in the counterfactual. It is a genuine addition to the national export base, but it is a gross receipt, and its domestic welfare effect is already captured in the operational value added estimates. The GST levied on international guest revenue is a net additional fiscal benefit with a present value of \$22m – \$34m at 8%. Ancillary spending in the wider economy – on transport, activities, food and beverage and retail – is separate from the lodge's own revenue and is unambiguously additive to New Zealand’s economy. The present value of international visitor ancillary spending ranges from \$104m to \$364m at 8% (\$232m – \$817m at 2%) across the estimation methods. Even the highest estimate could be below the true level due to reliance on New Zealand averages for occupancy benchmarks and spending decisions. The lodge is a unique offering within New Zealand, with the profile of guest exhibiting much greater spending power than most tourists.

Several further effects are additional but have not been quantified (Panel D), and their omission is deliberately conservative. Corporate income tax on the operating entity and tax on rental distributions to villa owners will accrue to the Crown but depend on how the lodge ownership is structured. That has not been confirmed at the time of writing. The qualitative spillovers of skills transfer, supply-chain development, destination branding and cultural contribution are also relevant but unable to be monetised at this stage. The quantified figures therefore understate the project's full economic contribution.

Table 13 – Economic Impacts Summary

Effect	Basis	Treatment	Detail	PV at 8%	PV at 2%
A. Gross Economic Activity					
(scale/contribution measure - relevant to significance test, not net welfare gain)					
Construction Value added	Gross VA	Scale measure	one off (2026 - 2031)	\$317m - \$376m	\$380m - \$422m
→of which direct				\$81m - \$88m	\$97m - \$98m
Operational Value added	Gross VA	Scale measure	2029 Opex=\$11m; 2032 Opex=\$16m	\$177m	\$397m
→of which direct				\$67m	\$152m
Construction + Operational VA	Gross VA	Scale measure	–	\$494m - \$553m	\$777m - \$819m
B. Employment					
(Job year equivalents, measured in MECs, not discounted)					
Construction Employment	Employment	Scale measure	626 - 688 jobs p.a. during construction	3,757 - 4,130	
→of which direct			185 - 191 jobs p.a. during construction	1,110 - 1,148	
Operational Employment	Employment	Scale measure	243 p.a. during operations	6,311	
→of which direct			138 p.a. during operations	3,576	
C. Net additional export earnings					
(gross receipts; on-site revenue overlaps with operational VA and is not additive with row A)					
International visitor on-site expenditure	Export earnings	Net additional impact	\$17m - \$27m p.a. from 2032	\$148m - \$227m	\$331m - \$503m
→of which captured by GST	Fiscal receipt	Net additional benefit	\$3m - \$4m p.a. from 2032	\$22m - \$34m	\$50m - \$75m
International visitor ancillary expenditure	Export earnings	Net additional benefit	\$12m - \$44m p.a. from 2032	\$104m - \$364m	\$232m - \$817m
D. Additional but unquantified					
(Conservative omissions)					
Corporate income tax	Fiscal receipt	Net additional benefit		–	–
Tax on rental distributions				–	–
Qualitative spillovers (skills, supply chain, branding, cultural)	Qualitative			–	–

In addition to the impacts summarised above, Table 14 draws together several other operational and investment metrics for the project. These figures summarise outputs already reported or included in calculations throughout Section 5. Not all of the greenfield equity FDI is modelled through the I-O analysis as the land and consenting costs are considered foregone[37].

[37] Inputs to the I-O model are also in real terms

Based on our analysis of the likely occupation data as applied to Brick Bay Lodge, we estimate that total visitor nights will range from just over 20,000 to 25,700 annually. Of this, high spending international visitor nights range from 12,400 to over 20,500 annually. The key dependency for visitor nights are the occupancy and international guest share assumptions in Table 8. Even the industry benchmark scenario applies a hotel room occupancy of 48% (c50 rooms) and a 24% occupancy on the balance of villas (c70 rooms); the conservative scenario applies 43% and 15% respectively. Those rates sit at the very lowest end of what accommodation of this type would be expected to achieve. These assumptions therefore lead to conservative estimates of additional effects.

Table 14 - Contextual Metrics Summary

Metric	Detail	Low	High
Visitor nights	Annually from 2032	20,042	25,700
→of which international		12,426	20,560
On-site employment per accommodation unit		3.4	
Additional greenfield equity FDI		$390m	

Table 15 has been added to the Appendix in response to a request for further information made on behalf of the Minister (9 June 2026). That table contains a summary of metrics reported throughout this section. Caution should be exercised if interpreting Table 15 without the context from Section 5.

6 Statutory Assessment

The referral criterion in s22(2)(a)(iv) of the FTAA is that the project will deliver significant economic benefits at a regional or national level. Our assessment addresses that requirement in three steps:

1. How the benefits are characterised;
2. Why they are significant; and
3. The basis for confidence that they will be delivered.

The economic case can draw on a combination of substantial economic impacts, export earnings, the structural characteristics of the investment, alignment with Government priorities and the sustained nature of benefits.

Characterisation of benefits

The benefits are summarised on three distinct bases. The FTAA prescribes no quantitative threshold for significance: it is contextual, and the Waihi North panel confirmed it is an indication of scale rather than a test of whether national GDP changes appreciably[38]. The gross economic activity analysis measures the scale of activity the project supports in the economy. We estimate that value added through the construction phase will be \$317m – \$422m and value added sustained through the operational phase will be \$177m, with a combined present value of \$494m – \$553m. This is a contribution to GDP, not a net welfare gain. The unambiguous net additional benefit to New Zealand is driven by international visitor demand. Ancillary expenditure is estimated at \$104m – \$364m and the GST receipts from on-site expenditure at \$22m – \$34m. Absent FTAA approval, this project will not proceed, meaning the investment will not enter New Zealand. The activity, employment and export earnings are nearly entirely additions, rather than a redistribution of activity that would have happened regardless.

Significance

The benefits are significant at both a regional and national level, despite the use of conservative assumptions throughout. Even at an 8% discount rate, value added is approximately half a billion dollars. The project will create an estimated 140 on-site jobs per year of operation and 190 direct jobs per year of the construction phase (2026 – 2031). New Zealand's FDI stock is 15 percentage points below the OECD median, highlighting the struggles that the country has attracting investment. Significance is reinforced by the duration of impacts and that the jobs will involve higher skills and wages than the hospitality average. The activity is concentrated in Auckland, where the majority of construction and operational value added is assumed to accrue.

The basis for confidence

The investment is committed, rather than speculative. A large share of benefits will be delivered through the construction phase and are not sensitive to demand assumptions. The development addresses a demonstrated and under-supplied segment of the luxury accommodation market proximate to Auckland,

[38] Record of Decisions of the Expert Panel for Waihi North (18/12/2025)

and the benefits accrue across a long operational horizon rather than depending on any single event. The primary delivery risk is commercial – based on the occupancy and yield. For this reason, conservative occupancy scenarios are used, with benefits significant even with very pessimistic inputs.

On this basis, the Minister can be satisfied that the project will deliver significant economic benefits.

Adverse effects

The economic analysis has not identified any adverse effects that would offset the benefits. The foreign investment would not enter New Zealand in the counterfactual; the opportunity cost of the land is modest relative to the value generated by the development; and the incremental infrastructure and service demand is small relative to the site's existing operations. The full balancing of benefits against adverse effects will be undertaken at the substantive application stage. For the purpose of meeting the referral threshold, the economic evidence supports the conclusion that the project will deliver significant economic benefits at both a regional and national level.

7 Conclusion

The economic case for Brick Bay Lodge is strong in the context of the Fast-track Approvals Act. The project will deliver significant and sustained economic benefits to the Auckland region and to New Zealand, commencing during construction and extending across the 30-year appraisal period to 2055.

The quantified benefits are reported on three distinct bases and, as explained in Section 5.1, are not summed into a single figure. Construction and operational expenditure are estimated to support a gross value added of \$494m – \$553m (PV, 8% discount rate). This measures the scale of activity supported, not a net welfare gain. Separately, international visitors generate net additional export earnings through ancillary spending in the wider economy and GST from on-site spending. The PV of ancillary spending is \$104m – \$364m and the PV of spending on-site captured as GST is \$22m – \$34m. These categories are measured on different bases and are reported separately to avoid double counting. All estimates are conservative: they exclude corporate income tax, income tax on rental distributions, domestic visitor spending and other revenue streams that have not been quantified for this report.

The project will sustain approximately 140 direct operational jobs per year alongside a construction workforce averaging 185 – 190 direct positions per year during the six-year build stage. These represent high-quality employment in a sector where New Zealand has both a strategic opportunity and a productivity deficit.

Beyond the quantified outputs, the economic rationale is reinforced by the nature of the investment. Brick Bay Lodge involves approximately \$390m in greenfield equity FDI (including \$25m land costs) at a time when New Zealand's FDI stock is 15 percentage points below the OECD median. This investment is additional relative to the counterfactual under which the capital will not enter New Zealand. Accordingly, the resulting activity, employment and export earnings are closer to net additions rather than displaced activity.

Designed explicitly for the high-yield international visitor segment, the project directly supports the Government's Going for Growth agenda, Tourism New Zealand's export growth targets and the broader objective of increasing the unit value of tourism. It addresses an identified gap in luxury accommodation supply, particularly in proximity to Auckland.

The economic evidence supports the conclusion that Brick Bay Lodge will deliver significant economic benefits at both a regional and national level, to the standard required by s22(2)(a)(iv) of the FTAA, and that conclusion holds even on the conservative occupancy and spending assumptions adopted throughout. The proportionality assessment under s85(3) will be undertaken at the substantive application stage, supported by a more detailed economic assessment.

8 Appendix

8.1 Response to 9 June 2026 Request for Further Information

The following table consolidates the economic information requested in the 9 June 2026 request for further information, with the corresponding estimate and a cross-reference to where each figure is set out in the report. All dollar values are in 2026 prices. As explained in Section 5.1, the effects are measured on different, non-additive bases and are not summed.

Table 15 contains extracts of key information. It is strongly recommended that this information is extracted from the tables in the relevant section of the report. Those sections include crucial explanations, such as the conservative nature of occupancy assumptions, how to treat impacts in terms of additionality, reasons for ranges or point estimates etc.

Table 15 - Information Request Values

Metric	Estimate	Reference	Notes
Additional visitor nights per annum	20,042 - 25,700	Table 14	From 2032. See the muster profile in Table 9
→of which international	12,426 - 20,560	Table 14	
Retained annual operational expenditure	$19m	Section 5.4	2026 prices; not discounted. Starting at $12m in 2029
Value added from operational expenditure	$177m	Table 6	PV@8% (2029 - 2055)
→of which direct	$67m	Table 6	PV@8% (2029 - 2055)
On-site international visitor expenditure	$148m - $227m	Section 5.5	PV@8% (2029 - 2055). Indirect and induced effects not calculated
Ancillary spending by international visitors	$104m - $364m	Section 5.6	PV@8% (2029 - 2055). Indirect and induced effects not calculated
Total jobs per year of operation	243	Table 7	
Direct jobs on-site per year of operation	138	Table 7	
On-site employment per accommodation unit	3.4	Table 14	
Local capture in Auckland	90% of construction jobs in construction phase; 91% of jobs in operational phase; practically all ancillary spending	Table 4,6	
Greenfield foreign direct investment	$390m		2026 prices; not discounted