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Memo

To Ministry for the Environment
CC Nathan Sanderson
From Kathryn Drew
Date 22 January 2026
Job No. 145570.14
Job name Matakana Country Club
Subject **Further information Request Response**

1. Overview

On 11 November 2025, Sanderson Partners Ltd applied for their Matakana Country Club (MCC) development project to become a referred project under the Fast-track Approvals Act 2024 (FTAA). This memo responds to the Minister's request dated 19 December 2025 for further information under section 20 of the FTAA. The request seeks metrics and supporting evidence for the statement that the proposed 208 independent living units and 30-bed care facility are regionally significant.

The purpose of this memo is to:

- Provide the further evidence requested; and
- Support the case for Ministerial referral for the MCC project under the FTAA

2. Summary of work undertaken

Following receipt of the request, we reviewed the matters raised and collated information from the applicant's technical experts. Two documents are provided in response:

- **WEBSTER Research Ltd – Regional Significance Memo (15 January 2026)**: This memo draws on analysis already completed for Sanderson Partners Ltd. It interprets existing demographic and demand evidence through the FTAA regional-significance framework, summarising indicators such as regional latent demand for retirement village units and care beds, expected resident origin patterns (~85% non-local), and the absence of comparable care-integrated retirement village supply in the Matakana–Omaha–Leigh corridor.
- **Property Economics – Economic RFI Response (19 January 2026)**: This memo provides further economic context, including Auckland-wide demographic ageing trends, likely price point and market positioning of the proposed development, and the scale of economic activity associated with the project. It also references relevant FTAA panel decisions regarding interpretation of “regional significance”.

Both documents rely on previously completed assessments (refer to Appendix I and J of the Referral application); no new modelling has been undertaken.



3. Key conclusion of expert reporting

The expert reporting (WEBSTER Research Ltd, Property Economics, and the technical appendices to the Referral Application) demonstrates that the project is regionally significant because of its specialist function and the regional-scale demand it serves, not simply its physical scale. The key conclusions are:

- a. **Retirement village development is not standard residential development.** The reporting makes clear that regional significance for this project does not derive from the number of dwellings alone. Retirement villages provide specialist housing and care infrastructure that responds to demographic drivers distinct from general housing. The application acknowledges that while “the scale of the project is not at the level that many would consider to be nationally or regionally significant,” the project is not standard housing and instead responds to “a critical demographic trend, the rapid ageing of Auckland’s northern population.”¹ This point is reinforced by the attached RFI memos, which treat retirement village and care facilities as region-serving infrastructure, not local residential supply²³.
- b. **There is a quantified regional shortfall in retirement-village and care capacity.** WEBSTER’s Net Latent Demand modelling identifies a region-wide shortfall of 15,499 retirement village units by 2048⁴ and a care-bed shortfall of approximately 6,396 beds in Auckland’s high-net-worth catchment areas⁵. These deficits persist even after accounting for all existing and pipeline developments. The MCC proposal provides a material contribution to these regional-scale deficits.
- c. **The demographic driver (rapid ageing) is regionally scaled and accelerating.** Auckland’s 70+ population is forecast to increase by 83%, and the 85+ population by 204%, by 2048 in the high-net-worth catchments that form the project’s core market⁶. These increases far exceed general population growth and create a structural regional demand for age-appropriate housing and care accommodation that cannot be met through conventional residential development.
- d. **The proposed development serves a predominantly regional, not local, catchment.** Approximately 85% of residents are expected to originate from outside the Matakana locality, primarily from Auckland’s high-net-worth suburbs and coastal second-home markets, indicating that the facility functions as region-serving infrastructure⁷. Standard residential subdivisions do not function in this way.
- e. **There is no comparable modern, care-integrated retirement village in the subregion.** The Matakana–Omaha–Leigh corridor has no existing full-continuum retirement villages and no modern integrated care suites⁸. The nearest pipeline capacity is urban and materially different in typology

¹ Sanderson Partners Ltd, *Matakana Country Club – Referral Application*, November 2025 — see s22(2)(a)(i)

² WEBSTER Research Ltd, *Further Information Memo – Regional Significance of Proposed Matakana Retirement Village & Care Facility*, 15 January 2026 — see section 7.1.

³ Property Economics, *Matakana Retirement Village Fast-Track Economic Impact Assessment – RFI Response*, 19 January 2026 — see Introduction + Significance Discussion.

⁴ WEBSTER Research Ltd, *Further Information Memo – Regional Significance of Proposed Matakana Retirement Village & Care Facility*, 15 January 2026 — see section 5.0

⁵ WEBSTER Research Ltd, *Further Information Memo – Regional Significance of Proposed Matakana Retirement Village & Care Facility*, 15 January 2026 — see section 6.2.

⁶ WEBSTER Research Ltd, *Further Information Memo – Regional Significance of Proposed Matakana Retirement Village & Care Facility*, 15 January 2026 — see section 4.1 and Table 11.

⁷ WEBSTER Research Ltd, *Further Information Memo – Regional Significance of Proposed Matakana Retirement Village & Care Facility*, 15 January 2026 — see section 7.1.

⁸ WEBSTER Research Ltd, *Further Information Memo – Regional Significance of Proposed Matakana Retirement Village & Care Facility*, 15 January 2026 — see section 8.1 and 9.



(e.g., Huapai, Riverhead, Milldale). This absence of substitute supply means incremental additions have regional functional significance, even at modest scale.

- f. **The specialist nature of retirement living means “scale” cannot be measured by typical housing thresholds.** Property Economics⁹ identify that precedent decisions cited (Waihi North; Rangitooopuni) confirm that regional significance in the FTAA context is about meeting region-wide needs and the scale of benefits in context, not the raw number of dwellings or GDP contribution. Retirement villages are delivered in discrete projects, constrained by land, consenting and capital, and must be assessed differently from general housing supply.
- g. **The project provides significant regional economic benefits.** The EIA estimates a regional economic injection of \$425–\$509 million and approximately 3,500 FTE-years over the development period¹⁰ – figures consistent with regionally significant activity when considered within the context of specialist, service-intensive retirement infrastructure.

4. Conclusion

To conclude, the evidence is that the MCC development delivers regionally significant benefits by addressing verified regional demand for retirement-village units and care beds, serving a predominantly regional catchment, and providing specialist infrastructure not available elsewhere in the subregion. This satisfies, in our opinion, the regional-significance threshold under the FTAA.

Yours sincerely

Bloxam Burnett & Olliver



Kathryn Drew
Planning Manager

s 9(2)(a)

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⁹ Property Economics, *Matakana Retirement Village Fast-Track Economic Impact Assessment – RFI Response*, 19 January 2026 — Significance Perspective, Waihi North and Rangitooopuni.

¹⁰ Property Economics, *Matakana Retirement Village Fast-Track Economic Impact Assessment – RFI Response*, 19 January 2026 — p 1-2 and EIA Appendix I



Attachment A – WEBSTER Research



MATAKANA COUNTRY CLUB FAST-TRACK REFERRAL APPLICATION

MEMORANDUM: REGIONAL SIGNIFICANCE OF PROPOSED RETIREMENT VILLAGE AND CARE FACILITY

Prepared for: Ministry for the Environment – Fast-track Approvals Team

Prepared by: WEBSTER Research Ltd

Author: Angela Webster

Date: 15th January 2026

Status: DRAFT THREE – Provided in response to a section 20 request under the Fast-track Approvals Act 2024

MEMORANDUM

To: Ministry for the Environment – Fast-track Approvals Team
From: WEBSTER Research Ltd – Angela Webster
Subject: Regional Significance of the Proposed Sanderson Group Retirement Village & Care Facility – Matakana
Date: 15th January 2026

1.0 PURPOSE AND CONTEXT

This memorandum responds to Item 1 of the Minister's request for further information (FTAA-2511-1132) under section 20 of the Fast-track Approvals Act 2024, seeking metrics and supporting evidence to substantiate the statement that the proposed 208 independent living units and 30-bed care facility at Matakana are regionally significant.

This memo draws exclusively on analysis and findings already presented in:

- Sanderson Group's Matakana Site – Economic Report (WEBSTER, August 2025)
- Appendix B: Competition & Price Point Analysis (WEBSTER, 2025)

No new modelling has been undertaken. The purpose of this memo is to interpret existing evidence through the lens of regional significance under the Fast-track framework.

A consolidated snapshot of the key indicators relevant to the assessment of regional significance is provided in Appendix A for ease of reference.

2.0 INTERPRETING "REGIONAL SIGNIFICANCE"

Within the Fast-track Approvals Act 2024 framework, the Minister may find that a project has significant regional benefits if it will increase housing supply, address housing needs, contribute to a well-functioning environment, or deliver significant regional benefits. This assessment focuses on the extent to which a project responds to documented and ongoing regional shortfalls in housing and infrastructure.

In the context of retirement villages and residential care, regional significance is demonstrated where a development:

- responds to quantified region-wide demand pressures,
- serves a catchment extending materially beyond the immediate locality,
- delivers infrastructure types that are scarce or absent at a subregional level, and
- provides capacity that contributes incrementally to closing an identified regional net latent demand.

3.0 EXECUTIVE SUMMARY

The proposed Sanderson Group retirement village and care facility at Matakana has regionally significant benefits because it responds to clearly documented regional demand pressures in retirement living and residential care across the Auckland Region, while serving a predominantly regional (non-local) catchment.

Key points are:

- Across the Auckland Region, WEBSTER's modelling identifies a net latent demand of approximately 15,500 retirement village units by 2048, after accounting for existing supply and the currently identified development pipeline.
- Auckland's high-net-worth local board areas, which form the core catchment for this premium retirement village, are forecast to experience a net latent demand of approximately 2,700 retirement village units by 2048, alongside a requirement for more than 6,000 additional care beds or suites over the same period to meet demand from local residents.
- The proposed development is expected to draw approximately 85% of residents from outside the immediate Matakana locality, primarily from Auckland's high-net-worth suburbs and coastal second-home markets, confirming its function as regional infrastructure rather than local housing.
- There is no modern, care-integrated retirement village provision in the Matakana–Omaha–Leigh corridor, and existing residential care infrastructure in the northern Auckland subregion is both limited and ageing.
- The project delivers a premium, care-integrated retirement village model in an underserved subregion, contributing incremental modern capacity toward meeting identified regional-scale retirement living and residential care demand.

Taken together, these factors demonstrate that the project makes a material contribution to meeting regionally scaled needs, consistent with the intent and application of the Fast-track Approvals Act 2024.

4.0 DEMOGRAPHIC DRIVERS

4.1 Auckland High-Net-Worth (HNW) Local Board Areas

The Auckland high-net-worth local board areas¹ of Hibiscus and Bays, Devonport-Takapuna, Albert-Eden, Waitematā and Ōrākei are the primary catchment for this premium, destination-style retirement village. As documented in the August 2025 report:

- The population aged 70+ in these areas is projected to increase from approximately 49,350 in 2023 to 90,130 by 2048, an increase of 40,780 residents and 83%. (Table 11)
- The population aged 85+ is projected to increase from approximately 8,720 to 26,540 over the same period, an increase of 17,820 and 204%.
- In 2023, an estimated 11.5% of the total population was aged 70+, and this is forecast to increase to 17.9% in 2048.

These are strong ageing trends and underpin sustained regional demand for both retirement village accommodation and residential care.

4.2 Local Area - Warkworth, Snells Beach, Matakana, and Surrounding Rural Areas

Ageing trends are also pronounced in the local area (see map 3a):

- Across the local area, the population aged 70+ is forecast to increase from approximately 4,660 in 2023 to 7,815 in 2048, an increase of 3,155 residents (68%).
- While the population aged 85+ is forecast to increase from 695 in 2023 to 2,045 in 2048, an increase of 1,350 residents and 194%.

5.0 RETIREMENT VILLAGE DEMAND

5.1 Auckland Region

WEBSTER's Net Latent Demand modelling indicates that demand for retirement village accommodation across the Auckland Region is substantial and sustained over the long term.

By 2048, total retirement village unit demand is estimated at approximately 37,477 units, representing an increase of around 22,981 units from 2025 levels. After accounting for all identified existing supply and the currently identified development pipeline, a regional net latent demand of approximately 15,499 retirement village units remains over the period to 2048.

While the proposed development represents a modest proportion of total forecast retirement village demand to 2048 when expressed as a single percentage, this does not diminish its regional significance. Retirement village supply is delivered incrementally through discrete projects, each subject to land availability, planning processes, capital constraints, and long lead times. No single development can, or is intended to, meet a large share of long-run regional demand in isolation. Instead, region-wide demand is met through the cumulative delivery of multiple projects over time.

Within this context, the proposed 208 independent living units represent a material increment of new supply within the northern Auckland subregion. The project contributes to addressing a structural regional shortfall that persists even after accounting for the full currently identified development pipeline, rather than displacing or duplicating existing or consented capacity.

Importantly, regional significance under the Fast-track Approvals Act 2024 does not require a project to resolve regional demand in full. It requires that the project deliver significant regional benefits. In this case, the project adds modern, care-integrated retirement living capacity in a subregion where supply is limited, serves a predominantly regional catchment, and contributes incrementally to meeting a demonstrable and ongoing regional net latent demand through to 2048.

On current assumptions, the identified development pipeline (excluding the proposed Matakana Country Club development), if absorbed solely by demand generated from residents within the Auckland Region, would be fully taken up by around 2032. This absorption point reflects the exhaustion of the current, time-specific pipeline of projects, rather than the satisfaction of underlying demand, which continues to grow materially beyond this point due to ongoing demographic ageing.

¹ Auckland high-net-worth (HNW) local board areas refers to the Hibiscus and Bays, Devonport-Takapuna, Albert-Eden, Waitematā and Ōrākei Local Board areas, which together contain some of Auckland's highest dwelling values and concentrations of affluent older households.

5.2 Auckland High-Net-Worth Areas

Within the Auckland high-net-worth local board areas of Hibiscus and Bays, Devonport-Takapuna, Albert-Eden, Waitemata, and Orakei, demand pressures are similarly pronounced.

Retirement village unit demand in these areas is estimated to reach approximately 9,981 units by 2048, an increase of around 5,635 units from 2025 levels. After accounting for existing supply and the currently identified pipeline, a net latent demand of approximately 2,686 retirement village units remains over the forecast period.

Under the same modelling framework, the identified pipeline in the area would be fully absorbed by demand from residents in these high-net-worth LBAs by around 2036, after which demand would continue to outpace supply.

5.3 Pipeline Absorption and Ongoing Demand Dynamics

The development pipeline should be understood as a rolling, time-bound response to demand rather than a fixed endpoint at which demand is met. Retirement village supply is delivered in discrete waves, shaped by land availability, planning processes, financing, and construction timeframes, while demographic demand grows continuously.

Although additional retirement village developments will continue to be identified and added to the pipeline over time, these future projects are themselves a response to the same underlying demographic drivers reflected in the current modelling. Their emergence does not negate the structural shortfall; it reflects the need for ongoing supply to keep pace with population ageing.

Given typical lead times for site acquisition, consenting, funding, and construction, new capacity is delivered with a multi-year lag relative to demand growth. As a result, successive pipelines tend to be absorbed over time, even as new projects come forward.

Taken together, the modelling demonstrates that full delivery of the currently identified pipeline would meet only part of forecast demand, with demand continuing to outstrip supply beyond the early-to-mid 2030s. This confirms that additional retirement village developments will be required over time to address ongoing, region-wide demand growth, rather than indicating any prospect of market saturation.

6.0 SHORTFALL IN RESIDENTIAL CARE CAPACITY

6.1 Condition and Age of Existing Facilities

Analysis in the August 2025 report shows that (*Table 18 and Section 8.3.1*):

- Approximately 40–45% of existing care beds and suites in the Rodney LBA and in Auckland's high-net-worth areas of Hibiscus & Bays, Devonport-Takapuna, Albert-Eden, Waitemata and Orakei are located in facilities constructed before 1980.
- Many of these facilities are poorly aligned with modern clinical standards and resident expectations.
- The Matakana–Omaha corridor has no modern care suites and only limited legacy rest home or hospital-level provision.

This indicates both a quantitative and qualitative deficit in care infrastructure.

6.2 Forecast Residential Care Demand

Forecast residential care demand by 2048 (*Table 20*):

- The Auckland high-net-worth area is forecast to require approximately 6,396 additional care beds or suites between 2025 and 2048. The currently identified development pipeline meets only an average of 2.9 years of this forecast demand growth.
- The Auckland Region as a whole is forecast to need an additional 21,260 care beds and suites by 2048. The currently identified development pipeline meets only an average of 2.5 years of this forecast demand growth.

The proposed 30-bed/suite care facility at Matakana Country Club provides additional modern care capacity within a region facing a substantial and growing shortfall.

7.0 REGIONAL CATCHMENT DEPENDENCY

7.1 Resident Origin

The Matakana proposal follows a destination-village model rather than a conventional proximity-based catchment. Based on the report analysis:

- Approximately 65% of residents are expected to originate from Auckland's high-net-worth local board areas of Hibiscus & Bays, Devonport-Takapuna, Albert-Eden, Waitemata and Ōrākei.
- Approximately 15% are expected to originate from second-home owners in Omaha, Point Wells, and surrounding coastal settlements.
- Approximately 15% are expected to be local downsizers (Warkworth-Rodney).
- Approximately 5% are expected to be lifestyle relocators or returning New Zealanders.

Accordingly, around 85% of residents are projected to originate from outside the Matakana locality, indicating that the development functions as region-serving infrastructure and contributes to meeting region-wide retirement living and care demand, rather than addressing solely local housing needs.

7.2 Accessibility

Completion of the Pūhoi–Warkworth motorway has materially improved accessibility between Auckland and Matakana, supporting a regional catchment and reinforcing the project's role as regional infrastructure rather than local housing.

8.0 ABSENCE OF COMPARABLE SUPPLY

8.1 Eastern Rodney and Matakana–Omaha–Leigh Corridor

Appendix B indicates that there is currently:

- No full-continuum retirement village east of Warkworth.
- No premium, low-density, landscape-led retirement village with co-located care in the Matakana–Omaha–Leigh corridor.
- Limited existing supply, which is generally older, smaller in scale, and lacks integrated care.

8.2 Pipeline Projects

Pipeline developments at Huapai, Riverhead, and Milldale contribute to overall regional capacity but are predominantly urban or higher-density in form and are located well south of Matakana. Their design, location, and typology do not substitute for the type of premium, care-integrated, rural-coastal village proposed at Matakana, nor do they materially address the identified supply gap in the eastern Rodney subregion.

9.0 SUMMARY OF REGIONAL SIGNIFICANCE INDICATORS

- Auckland Region retirement village unit net latent demand by 2048: approximately 15,499 units
- Auckland HNW retirement village unit net latent demand by 2048: approximately 2,686 units
- Required additional care beds and suites in Auckland HNW areas: approximately 6,396
- Proportion of existing care beds in pre-1980 facilities: approximately 40–45%
- Share of Matakana residents originating outside the local area: approximately 85%
- Modern care beds or suites currently available in the Matakana–Omaha corridor: none
- Comparable full-continuum villages in eastern Rodney: none

Indicator	Metric	Implication
Growth in the high-net-worth (HNW) area 85+ population	+204%	Major driver of regional care demand
Auckland Region retirement village unit net latent demand	15,499 units	Structural regional shortage
High-net-worth area retirement village unit net latent demand	2,686 units	Key catchment shortfall
Required care beds and suites (HNW)	6,396	Severe regional under-supply
Existing care beds in pre-1980 facilities	40–45%	Infrastructure obsolescence
Matakana Country Club uptake from outside the local area	~85%	Regionally dependent demand
Modern care beds and suites in Matakana–Omaha corridor	0	Significant unmet regional need
Comparable full-continuum villages in eastern Rodney	0	Unique offering

Source: WEBSTER

10.0 CONCLUSION

Taken together, the evidence demonstrates that the proposed Sanderson Group retirement village and residential care facility at Matakana has significant regional benefits and is a regionally significant project under the Fast-track Approvals Act 2024.

The project is regionally significant and has regionally significant benefits because it:

- Increases the quantum of age-appropriate housing in the region,
- Assists in addressing the clearly documented, region-wide shortfalls in retirement living and residential care capacity across the Auckland Region, including addressing shortfalls in premium aged care living facilities in the region,
- Serves a predominantly regional catchment, with the majority of residents expected to originate from outside the immediate Matakana locality,
- Delivers a premium, care-integrated retirement village model that is absent from the eastern Rodney and Matakana–Omaha–Leigh corridor
- During development, and once operational, the facility will generate steady on-site employment; and
- Provides incremental modern retirement and care infrastructure within a region experiencing acute demographic ageing and infrastructure obsolescence.

The proposed 208 independent living units and co-located care facility, therefore, constitute a development project that would deliver significant regional benefits for the purposes of section 22(1)(a) of the Fast-track Approvals Act 2024.

APPENDIX A: REGIONAL SIGNIFICANCE SNAPSHOT

Matakana Country Club - Retirement Village & Care Facility – Summary of Evidence

This snapshot summarises the key quantitative and qualitative indicators demonstrating that the proposed Sanderson Group retirement village and care facility at Matakana meets the threshold of regional significance under the Fast-track Approvals Act 2024, based on evidence presented in WEBSTER's August 2025 economic report and supporting appendices.

A. Regional Demand Pressure

Auckland Region – Retirement Villages

Based on WEBSTER's Net Latent Demand model and penetration rate assumptions used in the August 2025 report:

- Retirement village units required by 2048: 37,477
- Increase required 2025–2048: 22,981 units
- Remaining net latent demand after all known development pipeline: 15,499 units
(Source: Report Table 16)

Auckland High-Net-Worth (HNW) Local Board Areas² (Primary Catchment)

- 70+ population grows by 40,780 residents, 83% (49,350 → 90,130)
- 85+ population grows by 17,820 residents, 204% (8,720 → 26,540)
- Net latent demand in retirement village units by 2048: 2,686 units
(Source: Report Sections 6.1, 7.6)

B. Regional Shortfall in Residential Care

Residential Care Capacity Requirements

- Required additional care beds and suites in Auckland HNW areas by 2048: approximately 6,396 *(Source: Report Table 20)*
- The identified development pipeline addresses only a limited portion of forecast demand

Obsolescence of Existing Infrastructure

- Approximately 40–45% of existing care beds and suites in the Rodney Local Board Area (LBA) and Auckland HNW LBAs are located in pre-1980 facilities
- The Matakana–Omaha corridor has no modern care suites
- Recent delivery of new local care infrastructure has been limited
(Source: Report Section 8.3)

C. Regional Catchment & Market Dynamics

Destination-Village Catchment Pattern

Projected resident origins *(Report Section 3.3.2)*:

- Approximately 65% from Auckland high-net-worth local board areas of Hibiscus and Bays, Devonport-Takapuna, Albert-Eden, Waitematā and Ōrākei (primary market)
- Approximately 15% second-home owners (Omaha, Point Wells, Sandspit)
- Approximately 15% local downsizers
- Approximately 5% lifestyle relocators/returnees

Approximately 85% of residents are expected to originate from outside the immediate Matakana locality, confirming a predominantly regional catchment.

² Hibiscus and Bays, Devonport-Takapuna, Albert-Eden, Waitematā and Ōrākei Local Board Areas
Matakana Country Club – Fast-track Referral Application | Regional Significance Memo | WEBSTER Research Ltd | January 2026

D. Regional Supply Gap in Premium, Integrated Villages

Absence of Comparable Product in the Matakana–Omaha–Leigh Corridor:

- No full-continuum retirement villages east of Warkworth
- No low-density, premium retirement villages with co-located care in the Matakana–Omaha–Leigh corridor
- Pipeline projects at Huapai, Riverhead and Milldale are predominantly urban or higher-density in form and do not substitute for the proposed village typology.

(Source: Appendix B; Report Section 7.5)

Role of Matakana: The project delivers 208 premium independent living units and 30 care beds in a location characterised by:

- Improved regional accessibility following completion of the Pūhoi–Warkworth motorway
- Documented demand from Auckland's fastest-ageing and highest-wealth cohorts
- An absence of modern, integrated care provision in the surrounding subregion

Regional Supply Gap in Premium, Care-Integrated Retirement Villages: In addition to the overall shortfall in retirement village and residential care capacity, the evidence indicates a distinct gap in the supply of premium, care-integrated retirement villages serving Auckland's high-wealth catchments. Existing and planned villages within the northern Auckland and Rodney Local Board Areas are largely mid-market or urban in form, and do not provide a low-density, care-integrated village model of the type proposed at Matakana.

This gap is not solely qualitative. The August 2025 analysis demonstrates that a material share of retirement village demand in this subregion is generated by Auckland high-net-worth local board areas and coastal second-home markets, rather than the immediate Matakana locality. In the absence of an appropriately positioned product, this demand does not readily substitute into existing villages in Warkworth, Huapai, Milldale, or Silverdale, which differ materially in location, density, and service configuration. Instead, demand is either displaced to other subregions or deferred.

The proposed Matakana Country Club development responds directly to this unmet segment by delivering a care-integrated retirement village in a subregion where no comparable offering currently exists. In doing so, the project contributes to meeting regional-scale retirement living and care demand by expanding the functional range of supply available to Auckland's ageing population, rather than duplicating or competing directly with existing local provision.

E. Regional Significance Summary

Taken together, the evidence indicates that the proposed development:

- Responds to clearly identified, region-wide deficits in retirement living and residential care capacity
- Serves a predominantly regional, rather than local, catchment
- Delivers a care-integrated village model that is currently absent from the eastern Rodney subregion
- Contributes incremental modern capacity toward meeting a documented regional shortfall
- Addresses the shortfall of high-end, premium retirement village product in the area

Supporting Documents Lodged:

Sanderson Group's Matakana Site – Economic Report (WEBSTER, August 2025)

Appendix B: Competition & Price Point Analysis (WEBSTER, 2025)

Disclaimer: This memo has been prepared by WEBSTER Research Ltd for the sole purpose of responding to the Minister's request for further information under section 20 of the Fast-track Approvals Act 2024. It summarises and interprets material drawn from previously completed reports and publicly available data. While every effort has been made to ensure accuracy, WEBSTER Research Ltd does not guarantee the completeness, reliability, or suitability of the information for any purpose other than the Fast-track process. No liability is accepted for any decisions or outcomes that may result from the use of this memo or any reliance placed upon it by third parties.

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Attachment B – Property Economics Memo



19 January 2026

ECONOMIC MEMORANDUM

To: Sanderson Partners Limited

c/- Kathryn Drew

Planning Manager

BBO

Email: s 9(2)(a)

RE: MATAKANA RETIREMENT VILLAGE FAST-TRACK APPLICATION ECONOMIC RFI RESPONSE

INTRODUCTION

Property Economics has been requested by Sanderson Partners Limited to provide a response to the request for further information (RFI)¹ issued by the Minister for Infrastructure (the Minister) in relation to the Economic Impact Assessment (EIA)² prepared for the proposed retirement village development at 120 Tongue Farm Road, Matakana (the Project). This Project comprises the development of approximately 208 independent living villas together with a 30-bed care facility on a site of approximately 72ha.

Specifically, the Minister's RFI requests the following:

"To provide further information, including metrics, to support the statement that the additional 208 independent living units and 30-bed care facility is considered regionally significant."

ECONOMIC RESPONSE

All areas within the Auckland Region (as well as wider NZ) are experiencing sustained and accelerating growth in its older population, driven by demographic ageing and increased life expectancy.

Stats NZ's population projections³ indicate that growth in the Auckland Region's 65+ year age cohorts will materially outpace regional total population growth between 2028 and 2048 (i.e.,

¹ Titled "Request For Information on application for referral of the Matakana Country Club project under the Fast-track Approvals Act 2024", authored Ilana Miller.

² Titled "Matakana Retirement Village Fast-track Economic Impact Assessment", Property Economics, dated September 2025

³ Note that Stats NZ's 2023 base projections (by age) are currently only partially available and exclude data for the Auckland Region. As a result, the figures presented in this response rely on the 2018 base projections.

+51% vs +22%), resulting in a structurally increasing demand for retirement village / lifestyle accommodation options and aged-care services across the region.

Within this context, the proposed Project occupies a distinct and strategically important position in the regional senior housing market. Its coastal setting, regionally recognised village character, proximity to Warkworth and the wider Mahurangi area, and strong recreational and amenity offer make it a highly desirable destination for older households, particularly those seeking to transition into high-quality, lifestyle-oriented retirement living. However, despite this demand profile, the northern Auckland region remains under-supplied in terms of premium and differentiated retirement housing supply.

From a “significance” perspective, the Project would address a clear gap in the region’s retirement housing supply by delivering a luxury / premium offering that is not readily available within the regional market. In particular, existing retirement and aged-care facilities in the northern Auckland region are largely conventional in format. The Project is designed to serve a specific high net worth segment of the senior population seeking premium amenity and lifestyle-oriented living rather than duplicating standard or care-focused facilities in the region. The price point of the luxury units is estimated to likely predominantly range between \$2m-\$4m each, and likely to draw purchasers from across the region, not solely from the local market.

For additional consideration, Property Economics concurs with the expert panel approach on the Waihi North Project [FTAA-2504-1066]⁴ particularly in relation to the appropriate context for assessing regional significance, as outlined in the following paragraphs:

[842] “Significant” is a word of indeterminate meaning. It can, for instance, be used in in the sense of “game-changing”. But it can also have meanings along the lines of “worthy of note”.

[843] In the context of “deliver significant economic benefits”, it is not particularly likely that any one project will produce game-changing effects, certainly across the country as a whole. The same can be said of any one project to “increase the supply of housing”. Indeed, in a large city, even a substantial housing project is unlikely to make a material change to the supply of housing.

All of this supports the view that “significance” is not to be determined by reference to whether implementation of the project will appreciably change national or “regional” gross domestic product or the annual tax revenue of the Government. Rather it is an indication of scale.

⁴ Titled “The Waihi North Project [FTAA-2504-1046] Expert Panel - Record of Decisions of the Expert Panel under Section 87 of the Fast-Track Approvals Act 2024”, dated 18 December 2025.

[845] We do not see the word “regional” when used in relation to benefits as denoting the areas of a regional council constituted under the Local Government Act. Rather;

(a) we construe “regional” in a more general sense that, for our purposes, encompasses the area in and around Waihi which we will treat as the Hauraki District; and;

(b) in any event, we consider that 442 additional jobs for the Hauraki District is a significant regional benefit irrespective of the meaning to be attributed to “regional”.

For additional context, with respect to retirement village sector development, the decision on the Rangitooopuni Project [FTAA-2504-1055], which involves the subdivision of land to enable approximately 210 residential allotments and an approximately 350-unit retirement village, provides relevant contextual direction. As outlined in paragraph 280 of the Panel's decision:

[280] In terms of this [Rangitooopuni] Application, however, we are satisfied that it will have significant regional and national benefits: regionally in the provision of more retirement housing options; and, significantly, regionally and nationally because of the social, cultural, economic and environmental benefits it will bring to Te Kawerau ā Maki. (underline emphasis added)

Given the above context, a regional economic injection of between \$425m-\$509m as estimated in the EIA, and nearly 3,500 FTE years over the development period, is a significant development and level of economic activity generated in terms of scale.

Given the above, in Property Economics' view, the proposed luxury retirement village represents a required response to demographic and market trends within the region. In conjunction with the monetised and non-monetised economic benefits outlined in the EIA, Property Economics considers that the Project will contribute significantly to the economic benefits for the regional economy and senior housing market, and give effect the purpose of the FTAA.

Kind Regards

Tim Heath / Phil Osborne
Directors