

**BEFORE THE COMMISSIONERS APPOINTED ON BEHALF OF WAITAKI
DISTRICT COUNCIL COUNCIL**

Under	The Resource Management Act 1991 (the Act)
In the Matter	of Stream 6 of the Proposed Waitaki District Plan hearings (rezonings)
Between	OMARAMA STATION LIMITED Submitter
And	WAITAKI DISTRICT COUNCIL Local Authority

**MEMORANDUM OF COUNSEL ON BEHALF OF OMARAMA STATION
LIMITED ON THE SCOPE OF RELIEF SOUGHT**

DATED 28 SEPTEMBER 2026



GALLAWAY COOK ALLAN LAWYERS

Phil Page/Hannah Perkin

phil.page@gallowaycookallan.co.nz

hannah.perkin@gallowaycookallan.co.nz

PO Box 143

Dunedin 9054

Ph: (03) 477 7312

Fax: (03) 477 5564

**MEMORANDUM OF COUNSEL ON BEHALF OF OMARAMA STATION
LIMITED**

May it please the Court:

1. This memorandum is filed with is the evidence for Omarama Station Limited in support of its submission.
2. The planning evidence of Alana Standish explains that the original submission filed by Omarama Station Limited sought relief in two parts:
 - (a) General residential 1 zone proposal for the 36.5 Ha western land described in the evidence as the Saleyards Valley, or Rural Lifestyle zone in the alternative, and
 - (b) a Rural Lifestyle Zone proposal for an eastern block of some 55 hectares in area.
3. The original submission relief Plan is shown below:



4. During the course of the preparation of the evidence, Omarama Station Limited has limited its relief to the 36 Ha Saleyards Valley land. The relief sought in relation to the eastern 55 Ha area of land is formally withdrawn.

5. The proposed zone methods evaluated supported in the evidence for the Saleyards Valley land has been refined by the expert witnesses. The zone methods preferred by the expert witnesses is in two parts: the Settlement Zone method for the lower lying flatter land to the north; and the Rural Lifestyle Zone method with an Outline Development Plan overlay for the higher elevation areas to the south. Ms Standish's evidence at paragraph 19 confirms that the relief supported by the evidence is within the scope of the original submission. The reason for that refinement is to address landscape and infrastructure servicing considerations.
6. However, to be clear, Omarama Station Limited does not withdraw the General Residential One zone relief for the Salyards Valley land. The reason for keeping that relief alive is simply to preserve the maximum possible scope of the Hearing Panel's discretion when it makes its decision, should it consider that additional or amended relief is appropriate.

Dated 28 September 2026



P J Page / H Perkin

Counsel for Omarama Station Limited