

**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	ŌMARAMA STATION LIMITED Submitter
And	WAITAKI DISTRICT COUNCIL Local Authority

BRIEF OF EVIDENCE OF RICHARD AND ANNABELLE SUBTIL

DATED 28 SEPTEMBER 2026



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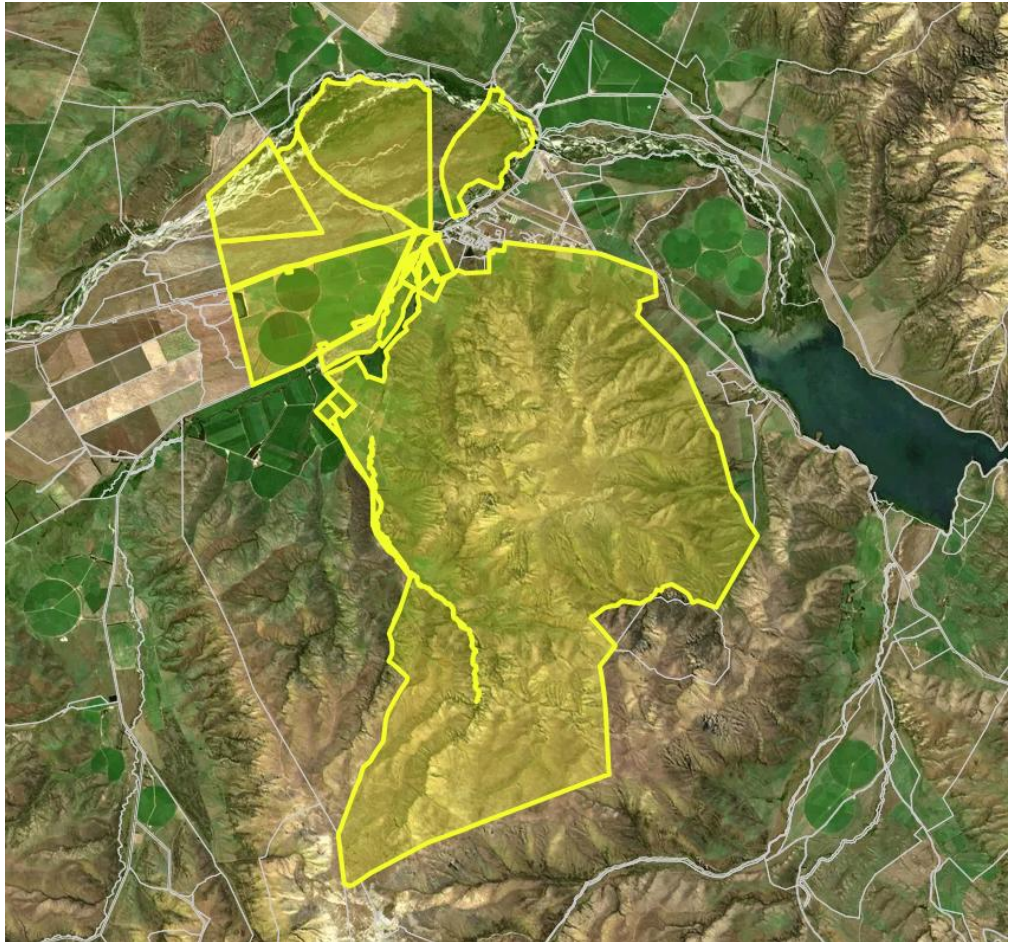
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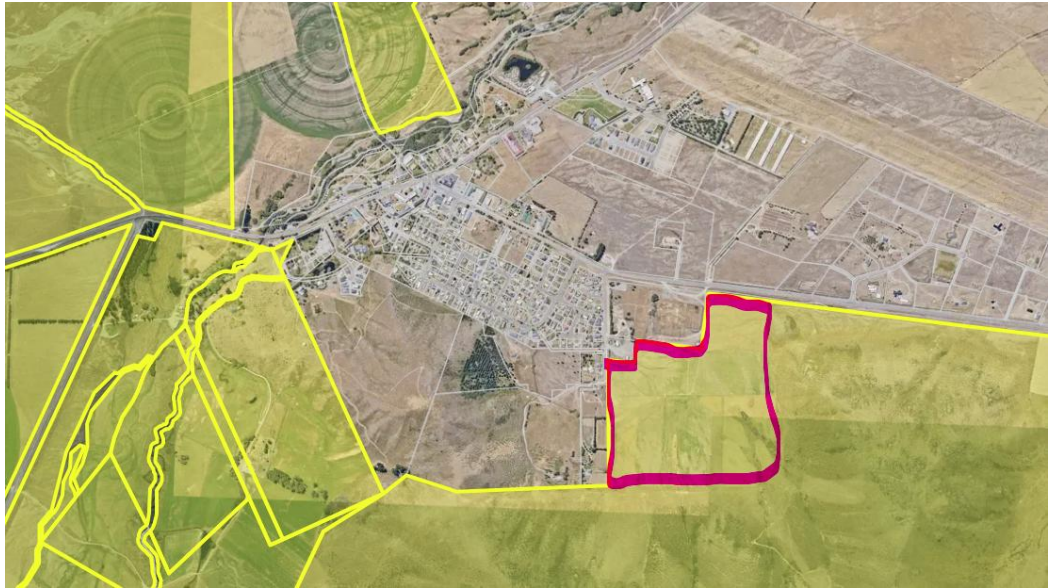
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Introduction

1. We are the shareholders (through our trust) and directors of Ōmarama Station Limited. Ōmarama Station Limited is the holding entity for Ōmarama Station, a 12,000-hectare fine wool and beef operation at Ōmarama. You can see below that we surround Ōmarama on 3 sides:



2. The land that we are seeking to rezone is known as the saleyards valley, roughly outlined in pink below, so you can see it in the wider context of the Station holdings:

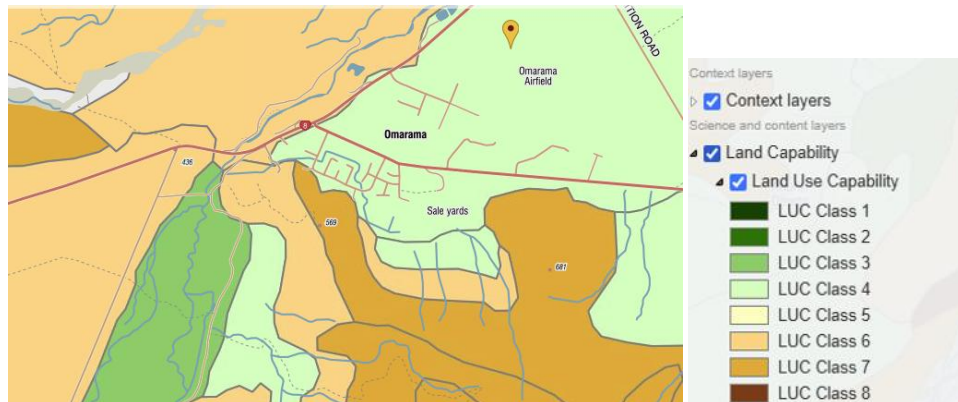


3. Ōmarama Station has been in the Wardell family for three generations. Annabelle is a Wardell. Annabelle grew up on Ōmarama Station. Richard is an ex-pat Englishman with a family background in beef cattle.
4. We were both (Richard and Annabelle) working in Dubai when we received a call from Annabelle's father, Dick, with bad health news and asking us whether we wanted Ōmarama Station. We came home and took over the farm. Our children, Emma and Henry, grew up on the Station. Henry has now returned home to be the fourth generation of Wardells on the land. We hope that Emma will join us with her fiancé in due course. This is intergenerational family land and our planning for Ōmarama Station is necessarily long term. This project is as much for Henry and Emma as it is for Annabelle and I.
5. Since returning home, we have won the 2015 Canterbury Supreme Balance Farm Environment Award, and in that year we also won the South Island Farmer of the Year. In 2021 we won the Farmers-Weekly Environmental Stewardship and Community Award. We are heavily invested in the Growing Future Farmers program and host and mentor young farmers from all over the country on Ōmarama Station.

The financial and environmental sustainability of Ōmarama Station as a farming enterprise is central to our thinking. The loss of about 30 Ha of dryland grazing will not cut across that thinking at all.

6. We are also shareholders of the sale yards company, along with many of the local High Country station holders. The sale yards were once very busy in the days before irrigation when everybody sold their store stock at the yards. These days, most of the farms have irrigation and are able to reliably finish their stock on the irrigated country, so the sale yards get used maybe once or twice a year at most. Stock sales these days are largely remote or on farm and the sale yards are rapidly falling into disuse. One day they will need to be converted to something else.
7. We note that the sale yards have been given a mixed-use commercial zoning in the proposed district plan and we support that as a logical next step for such a strategically important site close to town. We do not think that our proposed rezoning will, when developed, have any impact on the future of the sale yards at all. What we propose is compatible with the zoning in the Proposed Plan and we very much see that progressing together.
8. The submission seeks to rezone a semi-enclosed valley behind the sale yards. The valley is not irrigated and has an insignificant contribution to the wider scale of a 12,000 hectare Station. In recent decades, we have developed over 500 hectares of centre pivot irrigation to the north and west of Ōmarama in the Ōmarama Stream catchment and on the Ahuriri River Flats where water is available.
9. There is no highly productive land within the sale yards valley. We have inserted below a snip of the LUC map from Landcare Research Manaaki Whenua's website. What you can see is that the saleyards valley is mostly mapped as LUC class 4 (light green), rising to LUC class 6 and 7 on the elevated sloping land behind. There is an area of LUC 3 (darker green) on the Station to the East of Broken Hut Road

adjacent the Ōmarama Stream, but that is not affected by this proposal.



10. The idea of a subdivision behind the sale yards arose from frequent inquiries that Annabelle and I receive from people wanting a block of land in that Basin. Over the years, there has been sections available in Ōmarama. But most of them are on the flat, close to the airport, and suffer winter fog and the cold easterly that comes up the Waitaki Valley. The available sections lack of views or an elevated aspect. Frankly, we can understand why sections on the flat are very hard to sell. We would not want to live there.
11. We are currently building a retirement home for ourselves on the Station that has a northerly aspect and views of the mountains. We expect that is what most people will want.
12. The sale yards basin is elevated and north-facing. It is relatively frost-free and the views are magnificent. The Basin is sheltered from the cold easterly that blows up the valley. It is a lovely place to be. We are regularly approached by people wanting to buy a section in that basin, who are not interested in the current sections on offer around the town. Ōmarama is missing out on growth opportunities simply because of the quality of what is on offer. We have no doubt that we will be able to sell land in the basin relatively easily. People are looking for choice in Ōmarama and some are prepared to pay a premium for quality. That is

what we see is currently missing in the offering in Ōmarama and what we hope to provide.

13. We are aware that the proposed district plan shows a Canterbury Regional Council flood hazard overlay across the sale yards basin. We cannot understand what the reason for that would be. In the largest ever rainfall event in the winter of 2023, when the lower-lying areas of the Ōmarama Stream floodplain were very much under threat and water flowed through the camping ground, the sale yards basin was not impacted in any way at all. It stayed dry the whole time. There are natural rocky soaks that absorb the flows from the catchment above. The catchment is small, so not much water can accumulate. The threat of flooding would be much greater in the existing built-up area of the Ōmarama urban zones than the proposed area that we are contemplating.
14. There are a couple of areas of natural drainage in the upper slopes of the site that Paddy Baxter has identified on his development plan that we think should be protected as both an attractive natural feature and also allowing stormwater from up-catchment to soak in as it currently does.
15. We are aware of two concerns that have been raised with our consultants about this proposal:
 - (a) The substantial scale of the proposal relative to the current demand for sections.
 - (b) The lack of reticulated infrastructure available to serve the sections.
16. Our family is a long-term feature of Ōmarama. We take a long-term view of Ōmarama's growth and planning. For the Subtil family, this is

an intergenerational exercise that is most likely to be finished by our children rather than us.

17. We need to know where the future urban growth direction of Ōmarama as we are directly affected by it since our land surrounds 3 sides of Ōmarama. We see ourselves as a key stakeholder in Ōmarama's growth. We consider that the people of Ōmarama also need clear direction from the Council about the direction of growth. The Council needs to know where the town is going so it can plan for the town's future infrastructure needs.
18. To our minds, it makes sense to identify attractive, elevated, north-facing land that people actually want to live on as the future direction of urban growth for Ōmarama. Even better that the land is within easy walking distance to the village. That allows us to plan as a family and as a business, at the same time allowing Ōmarama as a community to understand its future direction. Questions about what the existing demand for sections might be do not inform long term strategic planning.
19. We are well aware of the Waitaki District Council's lack of infrastructure capacity in Ōmarama. The current water supply bore field is right next to our station driveway and was previously on the station before being recently relocated. The Council's water tanks are on our land. We have no doubt that additional potable water capacity could be made available with appropriate investment, but that is a decision for the Council, not for us. Intuitively, additional investment will need to be funded by development, but so far as we know, there is no plan for that in place.
20. We understand the Council's position is that it has no wastewater treatment capacity at its existing plant next to Ōmarama Stream, and has no intention to invest in further capacity. We cannot influence that one way or the other.

21. The form of zoning that we have suggested is one that is feasible either with, or without, reticulated infrastructure from the Council. We are perfectly content to develop unserviced 3,000 m² sections under the settlement zoning, or larger one-hectare (on average) blocks of rural lifestyle zoning towards the top of the basin. It is likely that we will want to do the Lifestyle blocks first then work our way down the hill as demand and/or infrastructure permits.
22. If public infrastructure constraints mean that urban density is not currently achievable, the alternative is that we provide our own self-contained reticulated infrastructure. To do that requires scale. Rezoning the whole saleyards basin provides the opportunity to explore the feasibility of providing privately funded infrastructure.
23. We have groundwater capacity within the Station that could be extracted via a bore field adjacent to the Ōmarama Stream and reticulated over the hill to the basin. It is only about 1,500m as the crow flies with a vertical lift of about 150m. We have not yet scoped the feasibility of that, but it is possible that a reticulated water supply privately funded and managed by Ōmarama Station can be achieved into the sale yards basin. Whether the Council is interested in partnering with us to extend its infrastructure capacity is a discussion for further down the track. Investing in feasibility analysis about that will only make sense to us if there is land rezoned for development.

Dated 28 September 2026

Richard and Annabelle Subtil