

**BEFORE THE ENVIRONMENT COURT  
I MUA I TE KOOTI TAIAO O AOTEAROA**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of appeals under Clause 14 of the First Schedule of the Act

**BETWEEN** **TRANSPower NEW ZEALAND LIMITED**  
(ENV-2018-CHC-26)

**FONterra CO-OPERATIVE GROUP**  
(ENV-2018-CHC-27)

**HORTICULTURE NEW ZEALAND**  
(ENV-2018-CHC-28)

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**WILL SAY STATEMENT OF DR ANTONIUS SNELDER ON BEHALF OF  
SOUTHLAND REGIONAL COUNCIL IN ANTICIPATION OF EXPERT  
CONFERENCING**

**WATER QUALITY**

**11 November 2021**

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Judicial Officer: Judge Borthwick

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Respondent's Solicitor  
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**ARATIATIA LIVESTOCK LIMITED**  
(ENV-2018-CHC-29)

**WILKINS FARMING CO**  
(ENV-2018-CHC-30)

**GORE DISTRICT COUNCIL, SOUTHLAND DISTRICT  
COUNCIL & INVERCARGILL DISTRICT COUNCIL**  
(ENV-2018-CHC-31)

**DAIRYNZ LIMITED**  
(ENV-2018-CHC-32)

**H W RICHARDSON GROUP**  
(ENV-2018-CHC-33)

**BEEF + LAMB NEW ZEALAND**  
(ENV-2018-CHC-34 & 35)

**DIRECTOR-GENERAL OF CONSERVATION**  
(ENV-2018-CHC-36)

**SOUTHLAND FISH AND GAME COUNCIL**  
(ENV-2018-CHC-37)

**MERIDIAN ENERGY LIMITED**  
(ENV-2018-CHC-38)

**ALLIANCE GROUP LIMITED**  
(ENV-2018-CHC-39)

**FEDERATED FARMERS OF NEW ZEALAND**  
(ENV-2018-CHC-40)

**HERITAGE NEW ZEALAND POUHERE TAONGA**  
(ENV-2018-CHC-41)

**STONEY CREEK STATION LIMITED**  
(ENV-2018-CHC-42)

**THE TERRACES LIMITED**  
(ENV-2018-CHC-43)

**CAMPBELL'S BLOCK LIMITED**  
(ENV-2018-CHC-44)

**ROBERT GRANT**  
(ENV-2018-CHC-45)

**SOUTHWOOD EXPORT LIMITED, KODANSHA  
TREEFARM NEW ZEALAND LIMITED, SOUTHLAND  
PLANTATION FOREST COMPANY OF NEW ZEALAND**  
(ENV-2018-CHC-46)

**TE RUNANGA O NGAI TAHU, HOKONUI RUNAKA,  
WAIHOPAI RUNAKA, TE RUNANGA O AWARUA & TE  
RUNANGA O ORAKA APARIMA**  
(ENV-2018-CHC-47)

**PETER CHARTRES**  
(ENV-2018-CHC-48)

**RAYONIER NEW ZEALAND LIMITED**  
(ENV-2018-CHC-49)

**ROYAL FOREST AND BIRD PROTECTION SOCIETY  
OF NEW ZEALAND**  
(ENV-2018-CHC-50)

**Appellants**

**AND**

**SOUTHLAND REGIONAL COUNCIL**

**Respondent**

**Introduction, qualifications and experience**

- 1 My full name is Antonius Hugh Snelder. I am a director of LWP Ltd and consultant and researcher in the field of water and land resources management. I hold a bachelor of agricultural engineering degree from the University of Canterbury, a post graduate diploma in hydrology from the University of New South Wales (Australia) and a PhD in environmental management from Lincoln University. I have 35 years of experience in the field of water resource management, including 14 years as a water resources scientist at the National Institute of Water and Atmosphere (NIWA), and prior positions in regional councils and in consultancies as a water resources engineer. I have published more than 50 papers concerned with land and water resources and management thereof in peer reviewed scientific journals.
- 2 In relation to the appeal of the proposed Southland Water and Land Plan (pSWLP), I previously provided evidence to the Court on the topic of the Physiographic Zones and attended expert caucusing for Topic A in relation to defining degradation and identifying degraded waterbodies.

**Code of conduct**

- 3 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014 and agree to comply with it. The contents of this statement are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this statement.

**Scope of will say statement**

- 4 I have prepared this will say statement in anticipation of facilitated expert conferencing.
- 5 This statement addresses:
  - (a) Degraded waterbodies; and
  - (b) Ephemeral flow paths.

**Degraded waterbodies**

- 6 In my evidence, I intend to:
  - (a) Say I support the addition of a 'Schedule X' of degraded waterbodies to the proposed Southland Water and Land Plan

(Plan) and the addition of various policies that require identification of degraded water bodies and requirements to improve their water quality.

- (b) Be able to discuss the water quality implications associated with any proposals by Appellants to change Schedule X and/or rules related to improving water quality.

### **Ephemeral Flow Paths**

7 In my evidence, I intend to:

- (a) Say I support the Council's suggested change of wording from 'ephemeral river' to 'ephemeral flow path' throughout the Plan, and that I support the proposed definition of an ephemeral flow path. I consider that 'ephemeral flow path' is a better description than 'ephemeral river' both in terms of the landscape feature of concern and the associated land management issues.
- (b) Be able to discuss the water quality implications associated with ephemeral flow paths and any proposals by Appellants to change rules relating to ephemeral flow paths.



**Antonius Hugh Snelder**  
**11 November 2021**