

**IN THE ENVIRONMENT COURT OF NEW ZEALAND  
WELLINGTON REGISTRY**

**I MUA I TE KOTI TAIAO O AOTERAROA  
TE WHANGANUI-A-TARA ROHE**

**ENV-2023-WLG-000005**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** Otaki to North of Levin (O2NL) Expressway

**Hearing Topic** Shared use path

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**Statement of evidence of Jacqui Lane on behalf of Kapiti Equestrian Advocacy Group, Horowhenua  
Equestrian Advocacy Group and NZ Equestrian Advocacy Network  
Date: 21 September 2023**

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## INTRODUCTION

1. My full name is Jacqueline (Jacqui) Lane and I am the Secretary of New Zealand Equestrian Advocacy Network. I am employed by Inland Revenue as a Business Lifecycle Manager for the Non-Resident Contractors' Team.
2. I have prepared this statement of evidence on behalf of **Kapiti Equestrian Advocacy Group, Horowhenua Equestrian Advocacy Group and NZ Equestrian Advocacy Network** in support of the Groups' submissions to on the Otaki to North Levin Road (O2NL).
3. I am authorised to provide this evidence on behalf of the Groups.

## QUALIFICATIONS AND EXPERIENCE

4. I have a Bachelor of Science in Biology (Botany and Zoology) from Victoria University of Wellington and a Trade Certificate in sheep and beef from Taratahi Agricultural Training Centre. I have also spent my lifetime learning about horses, their management and impact.
5. I am a founding member of the New Zealand Equestrian Advocacy Network and have supported the development of the groups' submission.
6. For the past 15 years, I have been riding horses on the roads and multi-use trails of Wellington city and its southern suburbs. I am also the equestrian representative for Wellington City Council's Safe and Sustainable Transport Forum, the Wellington Trails Forum and am part of a group working with Greater Wellington Regional Council to improve equestrian access and facilities in their regional parks.

## CODE OF CONDUCT

7. I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving oral evidence. Except where I state that I am relying on the evidence of another person, this written evidence is 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 evidence.

## SCOPE OF EVIDENCE

8. My statement of evidence considers the following matters in relation to the Groups' submissions on the O2NL
  - The realities and practicalities of equestrians sharing trails with other users
    - Benefits
      - Health, wellbeing, inclusivity, tolerance.
    - Perceived constraints
      - Track suitability & wear, fear, speed.

9. In preparing my evidence I have relied on the following:
- 15+ years of my own experience sharing different trails and terrains with a wide variety of other users
  - Feedback from other trail users
  - The O2NL application from Waka Kotahi
  - The submissions made by the Groups
  - The Resource Management Act (RMA)
10. The scope of this statement of evidence does not extend to identifying consequential amendments needed in response to the concerns raised.
11. For ease of administration, this statement of evidence focusses only on areas of remaining concerns. Where I do not specifically address issues raised in the Groups submissions I either agree with or have a neutral stance on the recommendations made by Waka Kotahi.
12. My statement of evidence addresses the following matters arising from the Groups submission on O2NL:
- Multi Use path design and ability for equestrians to legally use the path.

#### GENERAL COMMENTS

13. The Groups' submission points are that:
- We believe the full benefits of the Shared use path infrastructure on the O2NL will not be realized unless it is maximized to be a full, Multiuse pathway which will include a Cycleway Walkway and Bridleway (CWB).
  - NZTA will not achieve intended targets for the community intended by this infrastructure of safer connections for vulnerable road users, increased connectivity across the district, increased ability for active modes and health benefits of these, health and safety, emissions reduction, equality and economic benefits if equestrian use is excluded

#### HEALTH/ EQUESTRIAN SAFETY/TRACK DESIGN

14. I have ridden horses in Wellington city and southern suburbs for the past 15 years. Over the past 6 years, I've ridden up to 3 times a week on my own two horses. Almost always, I ride directly from the grazing location without having to travel my horses in a vehicle. I regularly ride with others, (including teenagers, septagenarians and those with disabilities) who either ride their own or one of my horses. We ride suburban roads including those with 70km speed limits, city streets, beaches, dog exercise areas, children's playgrounds, past schools, on wide farm tracks and steep, narrow, winding bush clad trails. **Refer appendix J1-3 photos of riding trails with other users.**
15. In all this time, I have encountered thousands of other users of all descriptions. The horses are almost always greeted with admiration and enthusiasm and generate conversations and connection. They are a favourite in the playgrounds where they have learned to stop and wait for the children to flock around them and then stand for upwards of 10 minutes to enjoy the attention. **Refer appendix J4 playground**

Commented [ET1]: Section for specific expert material

16. I have experienced a very small number of uncomfortable situations on trails in this time:
- One particular, older female mountain biker riding the narrow, winding, bush clad trails in Tawatawa reserve (off leash dog park) has 'growled' at me twice because she didn't believe we were allowed on the trail. She no longer rides these trails as there was conflict between her and the dog walkers.
  - The horses have been 'hounded' by uncontrolled dogs in the park on 3 occasions. My horses have learned to stand still and not to react unless they feel they are in actual danger. Once the dogs were under control, I assisted the owners with some socialising training for the dogs.
  - The most uncomfortable experience has been a fast, downhill mountain biker suddenly appearing behind the horse on a winding trail and slamming the brakes on on the gravel. Generally, the horses are more sensitive than us and have a great early warning system, stopping or slowing when they sense something coming, so even if the cyclist has earbuds and their head down, the horse will stop first to prevent a collision. This doesn't always work when there is no visibility and the bike is coming from behind. In this case, my horse bolted a few steps and then stopped with no harm done.
17. I also ride the roads. Although other road users are getting accustomed to seeing horses in our area, horses are a legal form of road transport and the NZ road rules have information regarding passing horses safely, I regularly have to deal with people not knowing how to pass safely, either following slowly for ages which unsettles the horses, driving past at speed, sounding their horns, yelling and waving. Also trailers clattering, tarpaulin covers flapping and in one case a tin can being flicked up by a car wheel and hurtling towards my horse causing him to rear and spin. Mostly this is on 30 - 50km/hr roads. Riding roads with speed limits greater than this is literally risking your life, that of your horse and of other road users.
18. Sometimes people are scared of the horses. This is understandable. They are large and intimidating. I either acknowledge this and ensure they are given the ability to pass with a wide berth, or, if they want, give them the opportunity to spend a bit of time with the horses to overcome their fear. More often than not, they choose the latter option and leave feeling empowered.
19. **My horses aren't anything special, and I'm certainly not a great horsewoman, but they are widely respected for their placid and friendly natures and their tolerance of loud noises and strange sights. I credit this to the fact that they have been exposed to so many situations that they (and I) have learned to be brave and accepting of different situations. Getting out and experiencing different sights is vital to building resilience in both horse and human. The social interaction is beneficial for all.**
20. The tracks I use are frequented by other road users and in one case, pass through a hillside paddock grazed by up to 7 other horses. The tracks are a variety of surfaces, but mostly rotten rock. In my experience of 15+ years of horse riding on these tracks, the main cause of damage to the tracks have been a result of water run-off creating channels and ruts caused by bicycle wheels. At no time have horses contributed to more than usual wear and tear.
21. Along with many others, I have also ridden the PP20 trail a couple of times. Sharing this wide, trail with good visibility was a breeze compared with the trails I'm accustomed to. It was lovely to ride side by side with other users, runners, walkers, families, cyclists and stop for a chat or exchange a few friendly words. One cyclist actually rode alongside me specifically to chat and

show her support of horses being welcomed on this stretch of road. **See appendix J5 sharing PP20**

22. It was interesting to note the damage caused by the rabbits digging in the pathway and because the grass was newly seeded and the ground wet, I chose to ride the pathway itself rather than the grass verge, but there was still plenty of space for all.
23. A recent and very short-lived (72 hours) poll put on the Kapiti Equestrian Advocacy Group's facebook page revealed that there had been almost 40 individuals who had ridden the PP20 pathway, 21 riding between 2 and 5 times and 7 having ridden it more than 6 times. More than 30 rode the pathway for pleasure and 9 used it as a means to get from one location to another. 62 persons showed an interest in riding it, but hadn't yet and 55 would ride the O2NL pathway.
24. Only two riders reported that they had had a negative interaction with another user, with all the remaining riders experiencing positive or neutral interactions.
25. I understand that the O2NL pathway will be of a similar design and construction to that of the PP20 pathway. In my experience of riding extreme trails where there is significant risk of, but in reality almost no incidences of conflict or health or safety hazards, there are no safety or damage concerns with allowing horses to use this pathway.
26. On the contrary, my experience provides that the inclusion of horses on this pathway will not only provide a safe means of transport and exercise and development of resilience for horses and their owners, it provides benefits to the wider community through the social interaction, of empowerment, development of tolerance and respect.

## **CONCLUSION**

Overall, I consider that a multi-use path which provides for use by equestrians is appropriate and necessary for the entire O2NL corridor:

Jacqui Lane  
Secretary, New Zealand Equestrian Advocacy Network Inc.