

**BEFORE  
WAIPA DISTRICT COUNCIL**

**IN THE MATTER**        of the Resource Management Act 1991

**AND**

**IN THE MATTER**        of an application for resource consent under section 88 of  
the Act for the establishment and operation of a sand quarry  
and cleanfill operation located at 928 Kaipaki Road,  
Cambridge

**BETWEEN**            Shaw's Property Holdings Limited  
(Applicant)

**AND**                    Waipa District Council  
(Consent Authority)

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**STATEMENT OF EVIDENCE OF JUDY BRADWELL**

**Dated 12 November 2020**

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## **INTRODUCTION**

- 1 My full name is Judy Bradwell.
- 2 I currently own and operate a sports horse training operation at Holme Hall Cottage, Holme, Newark, Nottinghamshire, UK
- 3 I have ridden and produced all sorts of horses all the way through my life, from show horses to dressage horses to eventers. I won Burghley 5\* International Horse Trails (the pinnacle of international eventing) in 1970, on a horse I bought as a 3-year-old and produced to the top level. I have produced and competed international dressage horses to top level.
- 4 I am a List 1 dressage judge and I am qualified to judge at eventing dressage at the Olympics and World Equestrian Games.
- 5 I am 1 of only 15 British Eventing Master Coaches in the UK.
- 6 I am a team selector for the New Zealand Eventing Team and have been for the last 10 years. As such I have a close working relationship with all the top New Zealand Eventers.
- 7 Given all of the above I consider myself to be an expert witness in the world of equestrian sports horses.
- 8 I visit New Zealand regularly to watch the progress of and coach the up and coming eventer riders, as well as judging higher level dressage. During my visits I regularly stay with Keith and Amanda Walker at 899 Kaipaki Road.
- 9 I have discussed at length with Keith and Amanda the proposed quarry entrance and the proposed changes to Kaipaki Road and understand the issues that have been raised.
- 10 I have known Keith and Amanda for more than 10 years and I have helped Amanda to produce some very exciting young sports horses. I am hopeful that one of their horses in particular is destined to be a part of Team New Zealand.
- 11 One of the reasons that Keith and Amanda purchased 899 Kaipaki Road was because it was already an excellent equine facility including an all-weather up-hill canter track which is extremely beneficial when producing sports horses.

## **Code of Conduct**

- 12 I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2014 and that I have complied with it when preparing my evidence. This evidence is entirely within my

area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

### **The Walker's Equine Concerns**

- 13 Keith and Amanda not only produce sports horses but they undertake horse rehabilitation for other people's injured horses. It is essential that horses undergoing rehabilitation are not spooked as any sudden movements could cause considerably more damage to the injury.
- 14 The work Amanda does with these horses necessitates the use of the uphill all-weather tracks for slow steady work, to help produce sports horses that can gallop and jump for up to 11 minutes. The rehabilitation horses use the uphill track to build muscle and strengthen tendons and ligaments to help prevent them from injuring themselves again.
- 15 Keith and Amanda are right to be very concerned that their horses will be spooked by lorry noises from the road and quarry entrance

### **Horse Behaviour**

- 16 Horses will try to run away from anything they do not understand, sudden noises and unexpected movements. Horses are flight animals not predators.
- 17 Racehorses are trained in a totally different way to sports horses. Racehorses are always trained in groups, they follow each other round and use each other for support as a herd would. However, sports horses are usually trained on their own and this increases the risk of spooking as they have no herd support.
- 18 I undertake racehorse re-training and spend a great deal of time getting retired racehorses to work on their own. I always tell my girls to ride out in pairs.
- 19 I have had many years' experience of producing young horses and when things suddenly appear in their vision, they generally revert to flight mode, meaning that they stop dead, spin, or bolt in terror. Any of these reactions can unseat a rider, no matter how good the rider is. This can result in an injured rider and a terrified horse that in its mind is galloping for its life, horses in this state of mind are very dangerous to the people on the ground and themselves.
- 20 The Walkers consider there is a need to move the end of their existing canter track further into the farm should this quarry go ahead in order to take the horses and riders away from what will be a busy T junction and to avoid potentially

dangerous situations. I agree with the Walkers and believe it is essential to move the track away from Kaipaki Road and the quarry entrance.

- 21 Sports horses are not trained in the same manner as racehorse, racehorses do most of their work in a fast canter or what is called  $\frac{3}{4}$  speed. This speed makes it far more difficult for a horse to spin as their momentum is carrying them forward more quickly. Sports horses on the other hand do a large part of their work at slower speeds (walk, trot and slow canter) and therefore they have less forward momentum making it easier for them to spin or bolt which can cause the rider to fall off.

### **CONCLUSION**

- 22 It would appear to me that the proposal the Walkers have put forward to the developer of this quarry, to move the canter track further into their farm would be a sensible one as it will help to keep their riders and horses safer than using the existing track with the new road only 8ft from the track with large lorries moving outside the gate as they enter and leave the quarry.

JUDY BRADWELL

12 November 2020