

BEFORE THE WESTERN BAY OF PLENTY DISTRICT COUNCIL

IN THE MATTER OF of the Resource Management Act 1991

AND of a resource consent application by Glen Isla Protection
Society Inc. under section 88 of the Resource
Management Act 1991 for the activities associated with
the construction and use of a coastal protection structure

STATEMENT OF EVIDENCE BY JONATHAN CLARKE

25 JULY 2025

1. INTRODUCTION

- 1.1 My full name is Jonathan David Clarke
- 1.2 I have a Bachelor Degree and Masters Degree in Coastal Engineering from the University of Southampton UK.
- 1.3 I am a member of the Institute of Civil Engineers and the New Zealand Coastal Society and was previously a Regional Representative for the Bay of Plenty Region.
- 1.4 My previous work experience includes over 25 years post graduate experience in civil, structural and coastal engineering.
- 1.5 I spent over 10 years working in the UK as a Coastal Engineer, before moving to New Zealand in 2016 employed as a Senior Coastal Engineer, and subsequently Principal Coastal Engineer, at Tonkin & Taylor Limited. I left Tonkin & Taylor Limited in 2024 to start my own company NuWave Coastal, where I currently hold the position of Director/Principal Coastal Engineer.
- 1.6 My experience includes working on hundreds of projects relating to the design of coastal protection structures, coastal process assessments, coastal management, public consultation and guidance documents at a local and national level.
- 1.7 I have worked on coastal engineering projects in the UK, Europe, New Zealand, Australia and the Pacific.
- 1.8 In New Zealand I have experience in working on coastal engineering and science projects throughout the country. This includes the design, and subsequent construction, of a number of rock revetments and the review of rock protection structures that have failed or underperformed.
- 1.9 I have been engaged as a technical peer reviewer by several councils in New Zealand to provide advice pertaining to consent applications relating to coastal engineering and science.

- 1.10 I have previously been engaged to work for Western Bay of Plenty District Council (“WBOP”), Tauranga City Council (“TCC”) and Bay of Plenty Regional Council (“BOPRC”), in matters relating to Coastal Engineering and Science.
- 1.11 My relevant local experience includes work on regional coastal erosion and inundation assessments for the whole of the Bay of Plenty coastline and Tauranga Harbour, designing a number of coastal protection structures and beach renourishments, and acting as the technical lead on aspects of the Opotiki Harbour Development design and consenting process relating to coastal engineering and science.

2. CODE OF CONDUCT

- 2.1 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court 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 before the Hearings Panel.
- 2.2 I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I have relied on the evidence of other persons. I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.

3. SCOPE OF EVIDENCE

- 3.1 I was engaged by Glen Isla Protection Society (“GIPS”) to conduct a technical peer review of work relating to a proposed rock revetment back stop wall in front of the properties at Glen Isla Place, Waihi Beach.
- 3.2 My peer review is limited to the coastal process and engineering aspects of the proposal and the documents provided to me, specifically;
- 3.2.1 Coastal Process Assessment, Appendix B, Western Bay of Plenty District Council (WBOP DC) online depository.
- 3.2.2 Location of MHWS Assessment, Appendix E, WBOP DC online depository.

- 3.2.3 Engineering Design Report, Appendix F, WBOP DC online depository.
 - 3.2.4 Construction Methodology, Appendix H, and subsequent response to S92 request, Attachment F, WBOP DC online depository.
 - 3.2.5 Response to second s92 request, email attachment, 'Attachment C - Davis Coastal Consultants second s92 engineering response.pdf'
 - 3.2.6 Submissions pertaining to the application, WBOP DC online depository.
 - 3.2.7 Coastal Engineering Review by Mr Davidson (Beca), Appendix 15 to the s42A Report, DC online depository.
- 3.3 I have also read a draft of Mr Davis' evidence, and have had the opportunity to discuss with him the findings of my peer review. Conclusions of peer review
- 3.4 The conclusions of the peer review are set out in the attached summary report. I confirm I have considered Mr Davidson's Coastal Engineering Review and it does not alter any aspect of my assessment or the conclusions expressed in the report.
- 3.5 I have also discussed my report with representatives of GIPS and with Mr Davis. Based on those discussions, I anticipate that the responses Mr Davis' final evidence will include in relation to my peer review will leave no matters unresolved.