

## **Andrew White**

MSc Const. Law FCIOB MAPM MAE MCIArb QDR(ED) and Chartered Construction Manager

## Director - Delay and Construction Management Expert

Andrew has over 40 years of experience and provides services in delay analysis, preparation and defence of claim submissions, assessment and audit of EOT entitlement, and construction project management matters.

Andrew is a Chartered Construction Manager with extensive construction experience who is regularly appointed as an Expert and Expert Advisor on delay and construction project management matters in adjudication, arbitration, and litigation and recognized by clients for his thoroughly researched, clearly reasoned, "common sense" based analyses.

Andrew has given evidence under cross-examination and concurrently through tribunal led expert conferencing ("Hot Tubbing").

### WWL says:

"Andrew is one of the best delay experts out there"

"He performed impressively well in a multidisciplinary case working in collaboration with other experts"

"He quickly identified the essential issues that were relevant for his analysis"

"Andrew White is singled out as "an extremely thorough expert" who is "able to be polite but clear with the client" when it comes to delay and construction project management matters."

### "WWL RECOMMENDED"

His experience has been acquired across a broad spectrum of building, power & utilities, industrial & manufacturing, transportation & infrastructure, oil & gas projects in both the UK and the Middle East under JCT, NEC, ICE, FIDIC, IChemE, and bespoke forms of contract.

Prior to 2007, Andrew worked for several major contractors for 25 years on a variety of projects within the civil engineering and building sectors, in various roles from site engineer through to projects director, with responsibility for projects from potential development scheme through to tender inquiry, construction and completion.

Examples of sector experience and testimonials are listed below.

#### Core Skills

**Expert Witness Delay Analysis** Construction Management Claims Management

### Sector Experience

**Airports Commercial Developments** Construction Management **Dams & Reservoirs Data Centres** Energy **Hotels & Leisure Facilities** Hospitals & Healthcare Industrial Port & Marine Works **Process Engineering** Railways Residential Retail Roads & Bridges Tunnelling Utilities Water Treatment

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#### SPECIFIC SECTOR EXPERIENCE

### **Airports**

### Airport, UK (2018-2021)

Independent assessment of contractor EOT entitlement on behalf of the Contract Administrator.

### Airport, Middle East (2015)

Party appointment in an ICC arbitration between a main contractor and M & E subcontractor in a dispute arising from delay incurred in the construction of an ATC and supporting facilities.

### **Commercial Developments**

### o Commercial Development, UK (2020)

Prime London Residential Development Jersey Master Holding Ltd v Withers LLP [2021] EWHC 2401 (Comm) Party appointment in litigation to concerning the demolition of a multistorey building whilst retaining an operational high-end retail operation at ground floor level, requiring an opinion on a reasonable demolition methodology and demolition period, absent certain events alleged to have been caused by the negligence of the Defendant. Andrew worked with an acoustic expert to identify the extent of delay and changes in methodology caused by alleged noise and vibration constraints with the extent of delay agreed between the parties at trial.

## o Commercial Development, Eastern Europe (2019 - 2022)

Party appointment under a VIAC arbitration in a dispute between contractor and owner concerning the construction of 10 and 16 - storey commercial office buildings requiring the analysis of critical delay and the effect of alleged mitigation and acceleration measures arising from the alleged increase in the density and complexity of reinforcement in the substantial basement structure. Andrew worked with multiple technical experts and the Respondent quantum expert and provided oral testimony under cross-examination.

## **Construction Management**

### Cladding Remedial Works, UK (2023)

Party appointment in litigation to opine on construction methodology and, reasonable leadin and construction periods on multiple buildings.

## Student Accommodation, UK (2021)

Party appointment in adjudication to opine on the sufficiency of temporary weather protection measures and routes of water ingress on a 460-bedroom student accommodation block.

### Waste to Energy, UK (2017)

Party appointment in a dispute between an EPC contractor and design consultant over alleged deficiencies in the consultant's design proposals. The appointment required a critical analysis of the feasibility of the contract design and procurement schedule and actual procurement process.

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### Residential and Retail Project, UK (2011)

Party appointment to assess programme feasibility and analyse the impact of changes to access and lay down areas that affected the on & off-site logistics plan on a £40m mixed commercial & retail building project.

### o Residential Project, UK (2011)

Assistant to Expert Witness – appointment by a main contractor in adjudication regarding crane utilisation and, formwork and falsework utilisation on a £100m reinforced concrete frame project in a city centre location.

#### **Data Centres**

### Data Centre (2022)

Party appointment to assess Contractor EOT entitlement and concurrency to assist in the evaluation of loss and expense.

### Energy

## Onshore Wind Farm, Africa (2020)

Advisory role in a dispute between sub-contractor and contractor regarding EOT entitlement and acceleration proposals.

#### Offshore Wind Farm, UK (2019)

Independent assessment of sub-contractor EOT entitlement.

## Biomass Plant, UK (2019)

Party appointment to analyse the cause and effect of delay events and likely range of contractor EOT entitlement.

## o Combined Cycle Power Plant, UK (2018)

Analysis of delay incurred by a contractor in the erection of stacks, air intakes, heat recovery steam generator and condensers at a combined cycle power plant (880MW). The 'Planned v As Built' analysis was undertaken across multiple contractual sections to demonstrate the effect of delayed access, construction status drawings, provision of attendances by the principal contractor, resequencing and disruption caused by other contractors.

#### **Hotels & Leisure Facilities**

### Leisure Facility, Caribbean (2023)

Party appointment in arbitration on a multi-building holiday development (LIVE APPOINTMENT).

## o Residential, Retail and Cinema, UK (2018)

Party appointment in an LCIA arbitration in a dispute between a contractor and PI insurers concerning the failure of a basement slab under hydrostatic pressure during the construction of a mixed use 20 storey residential development, requiring the detailed analysis of actual events, rates of progress and site logistical issues.

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## Hospitals & Healthcare

### Acute Care Hospital, UK (2018)

Technical audit of contractor programmes on behalf of a developer, to support a 2-stage bid process and advice on project time controls.

## Mental Health, UK (2017)

Party appointment concerning delay to the construction of a 79-bedroom dementia unit over 7 levels.

### Industrial

## Remediation, UK (2022)

Development of an EOT submission to support Contractor entitlement to an EoT and loss and expense for ground remediation works on a residential project.

### Paper Processing Plant, UK (2019)

Party appointment in litigation in a dispute under the terms of an insurance policy regarding a reasonable to period to design, procure and construct (replace and extend) a production facility damaged by fire.

### Laboratory, UK (2019-2020)

Party appointment in adjudication in a dispute between a contractor and M & E subcontractor over the construction of laboratory building and support offices (new build and refurbishment) including the installation and process integration of new and existing equipment.

#### Port & Marine Works

### Dock Extension, UK (2022)

Party appointment to assess Contractor and Subcontractor EOT entitlement.

## Dock Extension, UK (2021)

Critique of subcontractor analysis methodology.

### Port Facility, Middle East (2011)

Party appointment in a dispute between a contractor and Employer. Analysis of delay incurred in the construction of a piled jetty.

## **Process Engineering**

# Technical Audit, Kazakhstan (2016 and 2017)

Audit of progress, reporting, delay and resources utilized in the development of a major oil and gas field.

## Polyethylene Plant, UK (2008)

Part of a team investigating main contractor entitlement to an extension of time on a £200m polyethylene plant constructed under an EPC contract. This included auditing civil and welding sub-contractor delay and disruption claims to test allegations of cause and

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effect arising from design changes.

### Railways

### Station and Platform Upgrade, UK (2019)

Independent assessment of EOT entitlement on behalf of a contractor under an NEC 3 (design and build) form of contract.

### Residential

## Residential, UK (2022)

Independent analysis of EOT entitlement on a high-end mixed use city centre project.

### Residential, UK (2020)

Party appointment in arbitration to opine on delay to a high value single dwelling project.

### Social Housing, UK (2019)

Independent assessment of EOT entitlement and certain loss and expense issues on behalf of a Housing Association on a 35-unit design and build 'Extra Care' housing development.

#### Retail

### Retail Project, UK (2021)

Party appointment in potential litigation to provide an initial opinion on the causes of delay to the start-up of a mixed retail and leisure development.

### Retail Project, UK (2017)

Party appointment in a dispute between a contractor and Employer over entitlement to an extension of time on a complex 'cut and carve' retail development involving the construction of an additional floor and cinema complex and redevelopment of an existing atrium, mall and basement.

## Roads & Bridges

# Highway Project, UK (2017)

Analysis of accelerative and re-sequencing measures on a 'Managed Motorway' upgrade scheme under NEC 3 on behalf of the contractor demonstrating that absent the measures, Employer change events would have delayed Completion(s).

## Highway Project, Bolivia (2017)

Analysis of delay on the 'dualling' of an existing highway on behalf of a contractor to inform the settlement strategy.

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#### Utilities

## o Convertor Station, UK (2019)

Party appointment to analyse the cause and effect of delay events and likely range of subcontractor EOT entitlement.

## Utilities Infrastructure, UK (2012)

Delay analysis on a £60m utility infrastructure package on the London 2012 Olympic Park project. This required the review of delaying events arising from delayed and fragmented access arrangements, major diversions of the existing infrastructure and provision of new service infrastructure and plant.

### **Water Treatment**

## o Water Treatment Plant, Middle East (2021 - 2023)

Party appointment in a dispute referred to a Consolidated Dispute Board ("CDB") over the design and construction of water treatment plant. Andrew provided concurrent expert evidence to the tribunal.

### Water Treatment Plant and Pipeline, UK

Design and construction management on the extension and upgrading of a drinking water plant. This role extended to the development, submission and presentation of a delay and disruption analysis post completion, which formed the basis of the settlement between the parties.

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#### **TESTIMONIALS**

"I have worked with Andrew on several matters where he has provided an expert delay analysis. Andrew's work is always of a high quality. His attention to detail is exceptional. Above all though he is uniquely able to explain his analysis in jargon free plain English. I regularly recommend Andrew to other professionals."

Partner, UK Law Firm

"We have appointed Andrew to undertake several analyses including the provision of a formal expert opinion to assist in a successful defence in adjudication. His thorough approach is underpinned by a solid construction management background. He produces robust conclusions based on common sense factual analysis and clear reasoning. Should the need arise, we would not hesitate in appointing Andrew again."

Director of Planning, Major UK Contractor

"Andrew approached a complex delay analysis - involving various integrated sections on a state-of-the-art production facility - in an extremely methodical and thoughtful way. His attention to detail was first-rate and his written work exemplary - being both to the point and presented in user-friendly language. He tackled some particular challenges with good humour, provided no-nonsense views throughout and worked very hard to meet some exceptionally challenging deadlines. I have no doubt that we will work together again, shortly."

Partner, UK Law Firm

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