

**Before the Independent Hearing Commissioner
In Wellington**

Under the Resource Management Act 1991 (the Act)

In the matter of A Notice of Requirement by Wellington City Council to alter Designation 58 (Moa Point Drainage and Sewage Treatment) to provide for the construction, operation and maintenance of the proposed Sludge Minimisation Facility at Moa Point, Wellington

**Statement of evidence of Richard Stephen Galloway for Wellington City
Council – Construction Methodology**

Dated 18 November 2022

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Statement of Evidence of Richard Stephen Galloway

1 Introduction

- 1.1 Ko Raukawa te Moana
- 1.2 Nō Huetepara ahau
- 1.3 Ko Galloway tōku whanau
- 1.4 Ko Richard tōku ingoa
- 1.5 My full name is Richard Stephen Galloway.
- 1.6 I am a Senior Project Manager at McConnell Dowell Constructors Limited ('**McConnell Dowell**') and am responsible for the planning and delivery of a range of construction projects. McConnell Dowell and HEB Construction ('**HEB**') have formed a Joint Venture to deliver a number of waste water projects around New Zealand.
- 1.7 This evidence focuses on construction methodology matters arising from the Notice of Requirement ('**NOR**') lodged by Wellington City Council ('**WCC**') on 3 August 2022. The NOR is to alter Designation 58 (Moa Point Drainage and Sewage Treatment) in the Wellington City District Plan ('**WCDP**') to provide for the construction, operation and maintenance of the proposed Sludge Minimisation Facility ('**SMF**' or '**Project**') at Moa Point, Wellington.
- 1.8 I have been asked to provide evidence by WCC.
- 1.9 The McConnell Dowell – HEB Joint Venture was selected by WCC in July to provide Early Contractor Involvement ('**ECI**') inputs to the Project, with a view to constructing the Project. My role in the ECI phase commenced in August and includes providing inputs on methodology, costs, programme, and procurement to assist with consenting, funding, and design, to provide an optimised outcome that maximises the project benefits with best value. Assuming the Joint Venture is awarded the construction contract, my role will then involve planning and managing the physical works.

2 Qualifications and experience

- 2.1 I am a Chartered Professional Engineer with a Bachelor of Engineering (Civil) with first class honours from the University of Canterbury. I am a Chartered Member of Te Ao Rangahau Engineering NZ, as well as the specialist associated groups including the NZ Tunnelling Society, the NZ Transportation Group and the Rail Technical Society of Australasia.
- 2.2 I have worked as a Project Manager on a range of construction projects in New Zealand for the last 10 years including the Arras Tunnel, Pukeahu, the Victoria St Urban Transformation, commissioning the Mt Victoria Tunnel safety upgrade, the America's Cup infrastructure upgrades, infrastructure upgrades at Rimutaka Prison, and the duplication of the Hutt Trunk Sewer leading into the Seaview Wastewater treatment plant.
- 2.3 Prior to that, I worked for a decade as a consultant civil engineer and traffic engineer including undertaking assessments for a range of complex projects such as wind farms and geothermal power stations throughout New Zealand and in Scotland.

3 Code of Conduct

- 3.1 While the NOR is not before the Environment Court, I have read and am familiar with the Code of Conduct for Expert Witnesses in the current Environment Court Practice Note (2014). Accordingly, I have complied with the Code in the preparation of this evidence, and will follow it when presenting evidence at the hearing.
- 3.2 The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for the opinions expressed are also set out in my evidence to follow.
- 3.3 Unless I state otherwise, my evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

4 Scope of evidence

- 4.1 My evidence addresses the following:
- a Project description;

- b Construction methodology;
- c Erosion and sediment control;
- d Noise and vibration effects during construction;
- e Mitigation and conditions;
- f Response to submissions; and
- g Response to s42A officer's report.

5 Summary

5.1 As a summary of my evidence that follows, it is my view that the conditions proposed, including the preparation and implementation of management plans, provide an appropriate mechanism to ensure the construction-related effects of the project are no more than minor, noting the following:

- a One of the keys to success with this Project is that commissioning planning is already underway. By planning from the start, we ensure that everything required is in place in the right sequence.
- b Site establishment will be carefully planned to ensure safe and efficient construction. Stewart Duff Drive may have to be closed occasionally during construction for concrete pours and other activities.
- c Erosion and sediment control will be reasonably straight forward, due to the nature of the rock being excavated. The main focus will be on stabilising areas as quickly as possible. This will address concerns relating to water quality and dust, which is important for Airport operation and Cyclotek's air handling concerns.
- d While I am not an acoustic engineer, I have experience managing the effects of noise and vibration on large construction projects. Based on the sources of construction noise and proposed mitigation measures which I provided to **Mr Halstead**, he has set out his findings on the expected noise and vibration effects during construction, which include that these effects will be reasonable and can be appropriately managed,¹ and these align with my expectations.

5.2 In response to concerns raised by Guardians of the Bay, I do not expect that the noise involved with transporting oversize loads at night will be any greater than

¹ Halstead EIC, para 17.6.

normal road traffic noise, particularly given the route for such loads will include SH1 up to the Airport boundary at the end of Calabar Road, and then along the Airport taxiway to Freight Drive.

- 5.3 We will be able to work with Cyclotek² to gradually start any vibration inducing works at a non critical-time of the day (e.g. late morning when the Cyclotron is not operating), employing meters as required to ensure vibration remains within acceptable limits before moving to an earlier start (if appropriate).
- 5.4 In terms of noise, with the Airport operating from 6am to midnight next door, I expect our greatest risk of disturbance to occur when we do require night works.
- 5.5 None of the night work activities (these events carry the greatest risk of disturbing nearby residents) are expected to generate significant noise, and my attention will instead be focussed on mitigating the three activities which typically cause the greatest disturbance to residents.
- 5.6 During construction, Wellington International Airport Limited ('**WIAL**') will be engaged with to ensure that construction activities do not protrude through the OLS except by permit and dust does not cause any safety issues for Airport operations.
- 5.7 Lastly, our commissioning plan, developed at the very early stage of the construction project, will include that all odour containment will have been tested (with pressure gauges) during dry commissioning. This will give confidence that the risk of odour escaping through any means but the odour control units is low.

6 Project description

- 6.1 The Project is comprehensively described in the AEE and in the evidence of **Mr Chris French** . The detail of the Project continues to evolve as the collaboration of designers, operators and constructors identifies improvements that reduce construction effects, improve safety, improve performance, reduce costs, and improve the wider social benefits of the Project.
- 6.2 From a construction perspective, the key activities for the Project are:

² McGimpsey EIC, Appendix A, condition 25.2.

- a Developing detailed management plans, in consultation with various groups³;
- b Developing a procurement plan that provides enhanced opportunities for disadvantaged groups to be involved and to raise their capability;
- c Procuring specialist plant from a range of local and international suppliers;
- d Preparing the site, including implementing pre-construction controls, such as lizard relocation, improvements to the Cyclotek facility, demolition and mobilisation;
- e Undertaking the civil construction on the site, including earthworks, underground services, slope stabilisation and building construction;
- f Fitting out the building with the new plant;
- g Making associated changes to the existing Moa Point and Karori WWTPs;
- h Commissioning the new facility;
- i Decommissioning the existing sludge treatment facilities; and
- j Completing site works and demobilising.
- k I will address the effects of these activities in my evidence which follows.

7 Construction methodology and programme

- 7.1 Our construction programming began with a methodology and sequencing for construction of the design as it stood in July this year. Value engineering will lead to changes in detail, but I do not expect any wholesale changes in our construction approach. The value engineering approach has been based on integration between design and construction, in order to enable an early start and to minimise the duration and cost of construction.

³ Including Taranaki Whanui; Ngati Toa Rangatira; Wellington Water, their treatment plant operator Veolia and their network maintenance contractor Fulton Hogan; Wellington City Council (including various functional groups); Greater Wellington Regional Council; DoC.

Site establishment

- 7.2 The small size of the Project site brings complexity to the construction, and carefully planned site establishment will be key to ensuring safe and efficient construction. This includes planning for the location of site offices, laydown areas,⁴ workshops, and access points as well as public traffic management.
- 7.3 We intend to maximise the use of off-site fabrication, with plant assembled and tested off site, before being brought in on steel skids for a 'plug and play' type of installation. This will involve the use of offsite workshops, which have not yet been identified.
- 7.4 Stewart Duff Drive is a privately owned road, but will be kept open to the public including cars, bicycles and pedestrians. There may be very short exceptions to this, such as when erecting and dismantling tower cranes at night and during concrete pours,⁵ but these will be well planned (including with Wellington Airport as Road Controlling Authority) and communicated to road users.⁶

Construction staging

- 7.5 The detailed construction programme takes account of all of the required predecessors for each activity. This analysis has enabled the identification of packages of work that may be able to start early. It also then enables analysis of the critical path which has been established to involve the activities at the northern end of the site, including earthworks, foundations, building construction, and installation of plant. This highlights the importance of starting the earthworks as soon as possible, even if the AGS building is yet to be demolished.
- 7.6 The Construction programme will then fit around the completion of design, procurement of plant from around New Zealand and off-shore, along with a careful progression of trades to avoid clashes or the need to return to complete something. These processes are all focused on reducing cost and programme – thereby enabling the environmental benefits of the project to start as soon as possible, and minimise the economic cost to Wellingtonians.

⁴ It is intended that the hillock site be used as a laydown area. WCC is in the process of preparing a resource consent application to authorise its removal.

⁵ As set out in condition 25.1(q) which is appended to Mr Paul McGimpsey's evidence.

⁶ McGimpsey EIC, Appendix A, condition 25.1(o).

Commissioning

- 7.7 One of the keys to success with this Project is that commissioning planning is already underway. By planning from the start, we ensure that everything required is in place in the right sequence.
- 7.8 The general approach involves the following stages:
- a Factory Acceptance Tests, where a number of inspections and tests are made before plant even arrives on site;
 - b Dry commissioning, where the integration of plant is tested as much as possible before any liquid is introduced;
 - c Wet commissioning, where clean water (in this case treated effluent water from Moa Point) is used to test the operation of valves and boilers; and
 - d Biological commissioning, when sludge starts to run through the plant to start the biological processes.
- 7.9 Diligence in the first three stages makes the final commissioning more straight forward and therefore with less risk. One of the key focus areas during the biological commissioning is the capture and treatment of odour. All containment will have been tested (with pressure gauges) during dry commissioning, meaning this phase needs to ensure the odour control units are functioning effectively first, and then ensuring that product handling remains as planned.
- 7.10 Various management plans will also be prepared and used during construction. These are described in section 10 of my evidence.
- 7.11 Further details on construction methodology and programme are set out in section 4.6 of the AEE.

8 Erosion and sediment control

- 8.1 Overall, the rock at this site is not particularly prone to erosion and will make sediment control reasonably straight forward. The overall approach includes:
- a Minimising exposed areas by not disturbing them until needed;
 - b Stabilising exposed areas as quickly as possible;
 - c Diverting clean water away from exposed areas;

- d Treating water from exposed areas with discrete devices before discharging to the stormwater network for a short distance before it reaches Te Moana o Raukawa.
- 8.2 These approaches will assist in addressing both sedimentation and dust, with the big focus being on stabilising areas as quickly as possible. This will address concerns relating to water quality, and dust effects for airport operation and Cyclotek's air handling units, as well as our own need for cleanliness for the complex plant we are installing.
- 8.3 The detail of this will be captured in the Erosion and Sediment Control plan that is to be finalised (a draft of the Erosion and Sediment Control plan is in Appendix M to the AEE) certified by Greater Wellington Regional Council ('**GWRC**') and provided to WCC's Compliance Monitoring Officer at least days prior to construction beginning.⁷ It will be prepared in consultation with WIAL in relation to dust management controls.⁸ As with all management plans, it will continue to be updated to respond to weekly inspection findings, storm performance, and changes in methodology as the project progresses. As proposed in conditions, if any changes are made that require the recertification of GWRC, a copy of the revised Erosion and Sediment Control plan will be provided to the CMO within 5 working days of receiving confirmation of recertification.⁹

9 Management of noise and vibration effects during construction

- 9.1 This section of my evidence considers the noise and vibration effects of construction. While I am not an acoustic engineer, I have experience managing the effects of noise and vibration on large construction projects.
- 9.2 **Mr Halstead** has reviewed the sources of construction noise and proposed mitigation measures as set out in my evidence.¹⁰ **Mr Halstead** describes the assumptions he has based his construction noise assessment on. I confirm these assumptions are accurate.
- 9.3 **Mr Halstead** has set out his findings on the expected noise and vibration effects during construction, which include that these effects will be reasonable and can be appropriately managed,¹¹ and these align with my expectations particularly

⁷ McGimpsey EIC, Appendix A, condition 26.1.

⁸ McGimpsey EIC, Appendix A, condition 26.1.

⁹ McGimpsey EIC, Appendix A, condition 26.1.

¹⁰ Halstead EIC, para 13.1-13.3.

¹¹ Halstead EIC, para 14.16.

regarding the noise sources that I must focus on during planning and construction.

- 9.4 The largest sources of noise and vibration will be during the rock excavation and piling for the foundations of the building and digesters, which will occur during the first 12 months of the programme. Based on geotechnical testing to date, I expect the rock will be able to be ripped with an excavator with some rock breaking possibly required. The rock is not of such a strength that it will require blasting.
- 9.5 Similarly the ground conditions are such that ground improvements and foundations are unlikely to involve any form of driven piling, with the possible exception of some sheet piling for work on services. Instead, I expect mostly augered or drilled solutions which produce relatively little noise and vibration, as described in the evidence of **Mr Halstead**.
- 9.6 If driven piling is required, we will work closely with surrounding residents and businesses to establish the most appropriate times to start work, and will closely monitor effects to establish an appropriate operating regime. This may include avoiding particular times of day, and/or introducing shielding to deflect noise from particular directions. The Construction Noise and Vibration Management Plan required by condition 25.2 will ensure this occurs.
- 9.7 I have visited the Cyclotek facility and have an appreciation of the critical aspects of its operation. As well as being fascinated by the process, I left with a strong confidence that we will be able to work with Cyclotek to gradually start any vibration inducing works at a non critical-time of the day (e.g. late morning when the Cyclotron has stopped operating for the day), employing meters as required to ensure vibration remains within acceptable limits before moving to full scale operation.¹² This will similarly be addressed in the Construction Noise and Vibration Management Plan.
- 9.8 In terms of noise, I expect our greatest risk of disturbance to occur when we do require night works. The three foreseeable reasons for this are:
- a Crane lifts that penetrate the obstacle limit surface (OLS) and cannot occur during airport operating hours (as set out in proposed condition 24.1);¹³

¹² McGimpsey EIC, Appendix A, condition 25.2.

¹³ McGimpsey EIC, Appendix A, condition 24.1.

- b Transport of oversize loads that do not fit through the Moa Point Road tunnel and therefore need to be transported along the taxiway at night (as described in proposed condition 25.1(d));¹⁴
 - c Large concrete pours that need to start early to ensure a continuous supply of concrete and reliable temperature control (condition 25.1 (n)). Approximately 10 to 20 such pours will be required during the project, depending on final details of building materials.
- 9.9 These are all activities that require a high degree of advance planning in terms of logistics, and community engagement will form part of that planning. None of the anticipated night-time activities above are expected to generate significant noise, and my attention will instead be focussed on the three activities which typically cause the greatest disturbance to residents, being:
- a Reversing beepers – which can be replaced with the more effective and less disruptive ‘quackers’;
 - b Dropping traffic management signs – which can be controlled by setting up and packing up in the daytime; and
 - c Shouting, which can be controlled by providing sufficient two-way radios and with clear reminders at pre-starts.
- 9.10 I have experience with implementing these systems on the Mt Victoria Tunnel upgrade which occurred almost entirely at night.
- 9.11 Overall, given the location of the site, topography and use of the surrounding area, and the types of construction activities required, I do not expect construction noise and vibration from construction of this Project to create more than a minor adverse effect. Furthermore, the commitment to community liaison captured in the conditions, and which will be undertaken by one of my team members, will provide an effective avenue to quickly identify any adverse effects and enable my construction team to implement solutions to minimise the effects.

10 Mitigation and conditions

- 10.1 The proposed conditions for the NOR are discussed in the AEE and **Mr McGimpsey’s** evidence. I have reviewed those that relate to construction and consider they are effective and practical measures to control effects.

¹⁴ McGimpsey EIC, Appendix A, condition 25.1(d).

Effect type	Proposed mitigation measure	Condition reference
Closure of Stewart Duff Drive	These instances will be well planned (including with Wellington Airport as Road Controlling Authority) and communicated to road uses.	Condition 25.1(q)
Erosion and Sediment control	Erosion and Sediment Control Plan to include: <ul style="list-style-type: none"> a Minimising exposed areas by not disturbing them until needed; b Stabilising exposed areas as quickly as possible; c Diverting clean water away from exposed areas; d Treating water from exposed areas with discrete devices before discharging to the stormwater network for a short distance before it reaches Te Moana o Raukawa. 	Condition 26.1
Noise and vibration	Any noise and vibration effects will be managed through the Construction Noise and Vibration Management Plan (' CNVMP '). The CNVMP will identify measures to avoid, remedy or mitigate adverse construction noise and vibration effects on Cyclotek.	Condition 25.2
Night-time works	To be managed through the CNVMP and Construction Traffic Management Plan (' CTMP ')	Condition 25.1 and 25.2

11 Response to submissions

11.1 I have reviewed the submissions that comment on matters relevant to my evidence. I respond to the key matters raised below.

Wellington International Airport Limited

- 11.2 Wellington International Airport Limited ('WIAL') notes in its submission that it is particularly interested in ensuring that the OLS is complied with and that the use of the site does not pose any safety risks, particularly during the construction phase.
- 11.3 I have commented on these matters in general terms in my evidence above at section 7. In response to the particular matters raised by WIAL relating to the OLS, we are using a digital model to plan construction, and both Obstacle Limit Surfaces¹⁵ are loaded into it. This enables us to clearly identify any activities that may involve protruding through either of the surfaces and therefore first look to options that avoid such a need, or to ensure the required approvals are obtained in good time. From the work completed so far, the tower cranes are expected to require approval for protruding through the lower surface. The process of erecting and dismantling the tower cranes, as well as some concrete pumping operations, are likely to protrude through both OLS and therefore need to be undertaken during airport curfew hours.
- 11.4 We will obtain approval for any activities which infringe the OLS surfaces, working closely with WIAL and CAA I in accordance with the CAA Rule Part 77 process.
- 11.5 Notwithstanding any determinations reached under the Part 77 process, it is our intention to mitigate the potential for inadvertent OLS penetrations by fitting our tower cranes and other key plant with machine controls that feature a geofence. This technology uses the geospatial data and real time position of the plant to prevent an operator from accidentally encroaching through the OLS.
- 11.6 This system worked very effectively on our Old Mangere Bridge replacement project to protect the high voltage power lines that traverse the site.
- 11.7 In terms of dust, the wind is an unavoidable feature of working in Wellington, and I have plenty of experience of the south coast southerlies' ability to move dust and sand. Our response is therefore focussed around minimising the sources of dust, using techniques such as stabilising the ground, including placing site concrete as soon as the ground is prepared. These measures will be addressed on our Erosion and Sediment Control Plan.

¹⁵ Two OLS surfaces extend above the SMF site. The lower OLS extends horizontally from the runway centreline for 140m (half width of a 280m runway strip) and then inclines at 1 in 7. This is the surface which all permanent structures must stay below. The upper OLS surface extends horizontally from the runway centerline for 75m (half width of a 150m runway strip) and is the OLS that temporary structures must stay below. Approval can be obtained to protrude through these surfaces on the basis of an aeronautical study which confirms that potential temporary or permanent penetrations do not constitute a hazard in navigable airspace (Refer to CAA Rule Part 77 - Objects and Activities Affecting Navigable Airspace).

- 11.8 Excavated material will be either removed from site on the day it is excavated or, in the case of any small stockpiles, covered or wetted to prevent dust.

Cyclotek Industries Limited

- 11.9 Cyclotek Industries Limited (**'Cyclotek'**) raises concerns about noise and vibration during both construction and operation.
- 11.10 Cyclotek suggests various mitigation measures relating to protection of its facility from dust and bacterial particles. Cyclotek are also concerned about other issues such as water supply and electrical supply.
- 11.11 Condition 25.1(d) provides a sound basis to ensure close liaison with Cyclotek to provide a means to closely monitor effects and adapt our construction in response. It is also important to note that the medical cyclotron features high on our own risk register and we are highly motivated to ensure it is not compromised in any way.
- 11.12 I have commented on these matters in general terms in my evidence above at section 9. The proposal to avoid potentially damaging vibration until after the cyclotron has closed down for the day, until such time as there is confidence in vibration levels, is one of the key controls to avoid effects on Cyclotek.
- 11.13 The measures to control dust to protect the integrity of the laboratory are the next critical aspect of the controls and the proposals described by **Mr French** to cover enhanced maintenance of the air handling units and to cover the dispatch area will significantly reduce that risk.
- 11.14 Lastly, the improvements to Cyclotek's product dispatch area will provide an improved access arrangement for day to day operation. Access will also be available around the building for maintenance, but will require some planning to coordinate with our construction access. Such planning is routine in construction projects.

Guardians of the Bay

- 11.15 Guardians of the Bay (**'GOTB'**) raise concerns about construction noise. GOTB are particularly concerned about the noise from oversize activities which need to use the Airport runway for access at night.
- 11.16 I have commented on these matters in general terms in my evidence above at section 9. Crews involved in transporting oversize loads are well accustomed to working at night, and the noise sensitivity involved in that. As such they are

equipped with low-disturbance “quackers” for reversing, and two-way radios for quiet communication. The route to follow will generally include Oriental Bay, Evans Bay, Cobham Drive, Calabar Road and the airport taxiway.¹⁶ None of the loads envisaged will be particularly heavy, meaning no need for noisy extra high powered trucks. Instead, the flashing lights will likely be the only aspect that would alert anyone to something other than normal road traffic passing. Nevertheless, the movement of these loads will be communicated to residents in advance.

12 Response to s42A officer’s report

- 12.1 I have reviewed the S42A report and note the additional conditions proposed. I do wish to address the condition proposed to prohibit truck access during the morning and afternoon periods.
- 12.2 The site of this Project is very small, with limited ability to store materials onsite site. Furthermore, for dust control it is important to remove excavated materials as soon as possible. A restriction on access times therefore equates directly to a restriction on construction activity. My estimate is that the loss of two hours per day will add approximately six to eight months to the construction programme, and a cost of around \$10M to the Project.¹⁷
- 12.3 Given that our truck flows will be very minor relative to existing heavy traffic levels (as detailed by **Mr Michael Town**), I suggest this condition would not represent an appropriate balancing of economic and environmental effects.
- 12.4 Further amendments to conditions are recommended in the Section 42A Report in relation to earthworks. The amendments include:¹⁸
- a A copy of the certified ESCP being sent to the WCC CMO (condition 26.1); and
 - b All of Mr John Davies’ proposed conditions be included, except for the grassing of exposed areas.
- 12.5 The Section 42A Report comments that ‘Predicted night-time construction noise is predicted to produce levels of 7 dB above the recommended night noise limit at

¹⁶ McGimpsey EIC, Appendix A, Condition 26.1(d).

¹⁷ Based on standing plant and labour, and time related P&G being extended by 20%.

¹⁸ Section 42A Report, pages 16-17, section 8.1.8.

the closest residential dwellings'.¹⁹ The Section 42A Officer concludes that this is acceptable and can be managed with conditions.

12.6 I have commented on this generally at section 9 of my evidence. Overall, I agree with the Section 42A Officer's assessment that the noise effects can be managed through conditions.

13 Conclusions

13.1 Overall, having had the opportunity to contribute to this Project in Early Contractor Involvement role, I have had the opportunity to develop the construction methodology and contribute to the design development to reduce the construction related effects of the project.

13.2 With the controls described in my evidence and as set out in the proposed conditions, I expect the construction effects will be no more than minor.

Richard Stephen Galloway

18 November 2022

¹⁹ Section 42A Report, page 33, section 8.2.5.