

Witness Statement: Warren Jenchner

No of statement: 1

Exhibits 1- 14

Date of statement: 29th October 2019

GRENFELL TOWER PUBLIC INQUIRY

WITNESS STATEMENT OF WARREN JENCHNER

I, Warren Jenchner, will say as follows:

1. I make this statement in connection with a fire that broke out at Grenfell Tower located at the Lancaster West Estate in North Kensington, London W11.
2. The Independent inquiry, commissioned to examine the circumstances leading up to and surrounding the fire at Grenfell Tower, has made a request for a statement to answer specific questions which have been raised in relation to the lift works, undertaken by Apex Lift & Escalator Engineers Ltd "Apex" and my involvement in the same.

Background

Employment History/ Qualifications

3. In 1982 I enrolled at Woolwich College on a four year apprenticeship for lift engineering. I attended college on a fulltime basis for one year and day release for the remaining three years.

4. At the same time as studying on the course, I began working with the family company Apex.
5. Apex was initially started by my father, Arthur Jenchner and his partner in 1970. Apex at that time consisted of just those two people and initially they carried out lift works as subcontractors. As their reputation grew and they became known in the field, the company expanded and so did their areas of operation. In addition to lift works - both new installs and refurbishments, Apex began to manufacture lift parts which included the lift car, doors, and ancillary items.
6. I finished my apprenticeship in 1985 having acquired Engineering Industry Training Board "EITB" J5 and J26 certification, which were the industry standard accreditations at the time. I then formally took up the position of Repair/Construction fitter at Apex.
7. I held that post for 5 years and progressed through the Company holding different roles as follows:-
 - 1990 - 1992 Construction Supervisor;
 - 1992 – 1994 Repair Manager;
 - 1994 – 1996 Sales Manager;
 - 1996 to date Managing Director.
8. In addition to my position at Apex, I sit on the Board of Directors for the Lift and Escalator Industry Association "LEIA", our industry trade organisation, and have completed two terms of Presidency in 2008/9 and 2017.
9. As Managing Director of Apex, I hold overall responsibility for the day to day operations of the Company. That includes ensuring the delivery of successful lift installations, refurbishments, upgrades, and comprehensive maintenance and servicing contracts.

10. The business has grown during my tenure and Apex currently engages 123 direct employees over two sites of operation. Apex holds a maintenance portfolio of over 4,000 lift units and secures installation orders of up to 100 modernisations each year.
11. Apex are Royal Warrant Holders to HM The Queen, following major works and repairs carried out to passenger and goods lifts at Windsor Castle, after the fire in 1995.
12. Furthermore, for the past twenty years, Apex has undertaken lift maintenance, repair works, modernisations and installations for a number of high profile clients in or around London.
13. During my career spanning 37 years, I have undertaken a series of internal and external training courses which have provided me with various certification. In addition, within Apex there is a continuing programme of training and copies of my certificates are listed below and attached at Exhibit “(WJ/1:)”.
 - Certificate of Verified Achievement EOR/202 NVQ “Working safely in an engineering environment – Basic Lift Safety” January 2003;
 - Health and Safety for Directors and Senior Managers 24th June 2013;
 - Drug and Alcohol Awareness 3rd April 2019;
 - Health and wellbeing 3rd April 2019;
 - Stress Awareness in the workplace 3rd April 2019;
 - Microsoft Excel Intermediate September 2019.
14. Through my involvement with the LEIA I ensure that I am constantly abreast of changes within the lift industry.

Apex work at the Grenfell Tower.

15. I am aware of the fact that Apex undertook two projects at the Grenfell Tower. The first related to the lift modernisation of existing lifts. The second was for the installation of four landing entrances on two levels.

16. I was not personally involved in delivering the physical works although I had general awareness of the same.

17. The inquiry has asked me a number of questions about the projects. In order to assist the Inquiry and provide comprehensive answers to the issues raised I have reviewed the documentation that was retained by Apex. Due to the passage of time since the projects were completed, there is now very limited information available to me.

However, I have shared all the documentation with the inquiry in order to assist in the investigation and will respond to the questions asked below.

Question 1: Please describe your role within Apex, how long you have been in this post, any previous relevant roles within the lifts industry and your qualifications, training, experience in respect of lifts.

Answer: Please see paragraphs 3-14 above.

Project 1 (Lift Modernisation 2004-2007)

Question 2: Describe the nature of Apex's involvement in the lift modernisation project at Grenfell Tower (including any subsequent servicing) in or about 2004-2007.

Answer:

Apex were engaged by Butler and Young Lift Consultants Ltd ("BYCL") on behalf of their client, The Royal Borough of Kensington & Chelsea Tenant Management Organisation Ltd ("RBKC TMO") to carry out lift modernisation works within Grenfell Tower.

A copy of the contract for works and the specification for the works are attached marked Exhibit "(WJ/2: URN APX00005619)" and "(WJ/3: URN APX00005521)" respectively.

The main contract makes clear that the works were for the refurbishment of two electric passenger lifts HO90&91 and the replacement of a hydraulic passenger lift HO92. The focus of the inquiry is in respect of lifts HO90&91 as has been identified by Dr Barbara Lane.

The contract was prepared and issued to Apex by BYCL. The purpose of the contract was to provide details of the scope of works to be carried out, lift details, retained equipment, conditions of the equipment together with the lift, electrical and building specifications.

As can be seen from “(WJ/3: URN APX00005521)” the specification document for the project is extremely detailed which is usual when prepared by BYCL who were and remain one of the leading lift consultancies.

I am aware from the nature of the questions that have been asked by the Inquiry that the specification document has been thoroughly considered. However, I would make clear that the project was to modernise lifts HO90&91 and not to remove and install new lifts.

The preparation of the contract and therefore the specification of the work was the responsibility of BYCL, on the instruction of their client. Once completed and disseminated to Apex, there would be no scope for Apex to enter into any discussions regarding changes to the proposed work, design issues and suggestion for alternative plans.

The work conducted in relation to the project would be overseen by the Contracts Director at Apex who at the material time was, Gary Poynter. He was responsible for reviewing the specification, carrying out a site survey and thereafter producing general arrangement drawings and lift car drawings. Once he had completed the drawings, they would be sent to BYCL for approval as against their specification.

Thereafter Gary procured the materials needed for the project and staffing. Gary would attend pre start meetings together with his project manager, who at the time was Roger Anthony. The job was overseen and run between those individuals and they were responsible for the Apex engineers at the site.

Once the lifts were tested and witness tested by BYCL, they were put into service and Apex carried out a year of servicing under the DLP.

Question 3: How did Apex come to be engaged as the lift specialist contractor in relation to Project I within the Grenfell Tower (with reference to any tendering process undertaken)?

Answer: Having made a thorough search for documentation I have been unable to locate any tender documentation from which I can confirm how Apex first became aware of and were

engaged on the project. I have a recollection that there was tender documentation but regrettably I cannot comment further.

Question 4: Please exhibit the final version of the contract pursuant to which Apex was engaged in respect of Project 1

Answer: A copy of the contract is exhibited marked “(WJ/2: URN APX00005619)”.

Question 5: Please set out the scope of Apex’s duties in respect of Project 1. In addition to complying with the Butler & Young Lift Consultants Limited (“Butler & Young”) specifications, did Apex have a duty to ensure that the new lifts installed at Grenfell Tower were compliant with the requirements for lifts in high-rise residential buildings (as set out in the Building Regulations and associated guidance/the lifts guidance) and to advise Butler & Young or Kensington and Chelsea Tenant Management Organisation (“KCTMO”) if that was not the case?

Answer: As set out above, the scope of duties in relation to Project 1 are as set out in the specification document and contract.

I would like to take the opportunity to repeat once again that the project in relation to lifts HO90&91 was for modernisation of the existing lifts. Within the specification this is made clear in:

Part One

1.0 SCOPE OF THE WORK

1.01 The scope of the works shall be for the complete refurbishment of one pair of duplex passenger lifts within Grenfell Tower, incorporating enhanced speed and car dimensions, plus the complete replacement of the hydraulic passenger lift which serves the Social Services offices at the lower levels of the Tower.

As explained and indeed noted by Dr Barbara Lane at section L.4.2.3 of her report dated 24th October 2018, the hydraulic lift was demolished in the 2012 – 2016 refurbishment works and therefore not the focus of the inquiry.

In those circumstances and in relation to lifts H90&91 no new lifts were installed at Grenfell Tower.

Question 6: Identify the party/parties with whom Apex entered into relationships in order to carry out its role, describing the purpose of those relationships. Please also set out which organisations and individuals Apex staff regularly had contact with respect of its Project 1 works.

Answer: I am aware that Gary Poynter and Roger Anthony have been asked to provide a witness statements to the inquiry. As they were both engaged in the actual delivery of the works, they would be better placed to assist in providing an answer to this question.

Question 7: Provide an outline of the specifications for the lifts and related equipment provided to Apex for purposes of the modernisation project at Grenfell Tower, including but not limited to:

- a. Legible final construction drawings for the two new lifts at Grenfell Tower, as installed during Project 1;
- b. Please set out the fire rating of the lift doors at Grenfell Tower on Project 1 completion and exhibit the relevant certificates.

Answer: Please see the attached specification from BYCL which has already been exhibited as **“(WJ/3: URN APX00005521)”**.

- a. I exhibit marked **“(WJ/4: URN APX00000116)”** the general arrangement and lift car drawings for this project. As advised, there were no new lifts, only two refurbished lifts.
- b. I am aware that the lift doors were manufactured and supplied by Prop Brook. Having made a search, I could not locate any certification for the doors. Therefore, on the 30th March 2018 I contacted Prop Brooks for assistance. I attach marked Exhibit **“(WJ/5: URN APX00008687)”** an email response received from Prop Brook. They have been unable to provide any information. I can advise that it is usual practice for any

specifications that are provided to Apex in relation to projects, to be passed directly to the supplier who would meet those specifications.

In addition, the inquiry will be aware that BYCL carried out a check of all aspects of work delivered by Apex, both during and at the end of the project and identified any works that needed rectification. The landing doors were not raised as being an issue.

Question 8: Please confirm whether an Operation and Maintenance ('O&M') Manual was provided to the client following completion of Project 1 work and exhibit this document.

Answer: I have been unable to locate a manual. However, I have been able to locate correspondence, copies of which are attached marked Exhibit "(WJ/6: URN APX00001034 and URN AXP00001047)". The email confirms that the manual was provided to BYCL on the 2nd February 2005 and 4th May 2006.

Question 9 Section 2A.70 of the Butler & Young specifications (April 2004) sets out the requirements for the Fireman's Control subsystem¹ within Grenfell Tower. With reference to this section, please confirm:

- a. The location, number and operability of Fireman's Control switch(es) in place at Grenfell Tower before Apex carried out the modernisation project;
- b. The location and number of Fireman's Control switch(es) installed and/or modernised by Apex as part of the project and how they were connected to the lifts;
- c. Section 2A.14 (8) required "firemans control...on each lift"—were two switches installed (one per lift) and if not, why not?

- d. Your understanding of the intended operation/functionality of a Fireman's Control subsystem in the event of a fire (including how it was intended to function where two lifts were in operation);
- e. Whether the Fireman's Control switch(es) installed by Apex were fully compliant with the requirements in section 2A.70 of the Butler & Young specification? If so, how was such compliance confirmed? If not, in what respect did they diverge from section 2A.70 requirements?
- f. Whether the correct operation of the Fireman's Control switch(es) was checked during or following the Project 1 works, by Apex or anyone else (insofar as this is within your knowledge). If so, what was the result of the check(s) (please exhibit any relevant documents/certificates)?
- g. What was/is Apex's expectation for sufficient maintenance/testing of a Fireman's Control Switch following the completion of Apex's modernisation work? In particular, should any maintenance/testing involve the insertion of a drop key, activation of the Switch and observing the effect on the lifts, rather than just a visual inspection of the Switch?

Answer a: Regrettably due to the lack of documentation, I am unable to assist in answering this question.

Answer b: I have looked at the general arrangement drawings which I have exhibited as "(WJ/4: URN APX00000116)". From those drawings the Fireman's Control switch is located between the lifts at the ground floor. Whilst I cannot help with specific detail, the usual connection for the switch would have been to the Thames Valley control system. The system is housed in the motor room which is located on the roof of the building.

Answer c: I refer to Section 2A.14 (2) of the specification. That section states:

The control of the lift shall be duplex fully collective with automatic powered door operation.

Both lifts had a fire control system connected to one switch which was located in between the duplex lifts on the ground floor. It is common practise to have one switch for a duplex for ease of use and to remove any confusion. As the lifts were duplexed one fireman's switch is allowed for the control of both lifts. I have also reviewed the snagging list that was provided by BYCL, a copy of which is attached marked Exhibit **“(WJ/7: URN APX00005598)”**. The list was produced following a detailed check by BYCL of the works provided by Apex. There is no reference in the list for the need to install two switches.

Answer d: I would explain the intended operation/functionality of a Fireman's Control subsystem in the event of a fire as follows:-

- The fire rescue service would operate the fireman's switch by an Express type drop key which they would hold;
- The key would be inserted into the fireman's switch and turned. This would operate the control system, the lifts would stop at the nearest floor without the doors opening and announce “lift returning to ground floor on fire control”;
- Both lifts would return to ground and park with the doors open;
- The fire rescue service would have control of the lifts. In order for them to reach a designated floor they would apply constant pressure to the floor button to enable the car doors to close and travel up to the intended floor.

Answer e: I would refer back to the snagging list produced by BYCL exhibited as **“(WJ/7: URN APX00005598)”**. Had there been any issue in failing to comply with the specifications then it would have been noted by BYCL. There is no such reference. This was an item that would have been tested for its operational capability by BYCL at the witness test. I would refer to section 2A.75 in the specification document exhibited as **“(WJ/3: URN APX00005521)”** which refers to the required testing.

Answer f: Roger Anthony carried out the tests at the time and may be better able to assist the Inquiry in providing a response. I can confirm that the lift was tested in compliance with BS 5655 Part 10 and I attach the certificate at marked Exhibit **“(WJ/8: URN**

APX0000094)” the test documents. This was also in accordance with the specification as identified at section 2A.75, which detailed that :-

“After installation of each lift has been completed, the Sub Contractor shall, in the presence of the SO carry out the tests and examinations set out in BS5655 Pt 10, together with any further dynamic or other tests required by the SO to ensure that the installation complies with the specification.”

Answer g: In relation to testing, I confirm that the company expectation was that as part of his testing, Roger Anthony would test all controls to ensure that the lift was functioning correctly. This would involve the physical insertion of the key to ensure that it operated. In terms of testing for the one year DLP, the expectation was that similar checks would be made.

Projects 1 and 2

Question 10: In relation to the status of the two lifts at Grenfell Tower following completion of Project 1 modernisation, please confirm:

- a. Whether Apex regarded the two lifts installed to be ‘new lifts’ for purposes of lifts guidance;
- b. Your understanding of what constitutes a ‘firefighting lift’ in the context of lifts guidance;
- c. Whether by way of the Butler & Young specifications (April 2004) or otherwise, Apex was required to ensure that the Grenfell Tower ‘modernised’ lifts met the definition of a firefighting lift;
- d. If Apex considered that a firefighting lift was not provided for in the specifications but was required (having regard to the nature of the building and the lifts guidance), what if any steps did Apex take to highlight this to Butler & Young/KCTMO? If no such steps were taken, why not?;

e. In your experience of installing new lifts in high rise residential buildings (following the implementation of 'firefighting lift' requirement within lifts guidance) was it unusual for non-firefighting lifts to be installed in such a building?:

f. With reference to correspondence, documents and/or conversations, were other organisations (including KCTMO, LFB, RBKC Building Control etc.) and individuals (including Carl Stokes) aware that the lifts did not meet the definition of a 'firefighting lift'? If so, please set out any information about the extent of that awareness and any communications surrounding this issue (to the extent of your knowledge):

Answer:

a. Please see the responses provided above to questions 2 and 5. As I have made clear, Project 1 was to modernise lifts HO90&91 and not to remove and install new lifts. This was identified in the section headed "Part one scope of works" which I have set out in the response to question 5.

b. A firefighting lift is a lift which has protection, controls and signals which enable it to be used under the exclusive control of the fire-fighters. As a minimum it will have in place:-

- Minimum 630 kg / 8 person lift car;
- Minimum lift car interior size of 1400 mm x 1100 mm;
- Must travel the height of the building in less than 60 seconds;
- Must have automatic power operated doors;
- Doors must be at least 800 mm wide and 2000 mm tall;
- Position indicators must be fitted inside the lift car and at the FSAL (Fire Service Access Level);
- A two way intercom must be provided between the machine room, lift car and FSAL;
- The lift must not be used for goods transportation;

- An emergency trap door must be provided in the car roof which must be at least 400 mm x 500 mm;
- Rescue shall be available from both inside and outside the lift car;
- Buttons shall be protected against water ingress;
- Electrical equipment in the shaft shall be protected against water ingress;
- An audible fire alarm must be fitted to alert a maintenance operative of the firefighting need;
- A secondary power supply must be provided;
- The shaft must be protected from water ingress by drains and/or ramps;
- A "peek a boo" control system when on firefighting mode;
- The car interior components shall be a minimum of class 0 resisting combustion;
- The lift must have fire rated doors;
- The lift must be within a separate fire compartment;
- Shaft smoke ventilation should be provided.

c. As I have identified in response to various preceding questions, the work that was carried out was to the specification produced by BYCL. In answer to question b above I have set out the minimum requirements for a firefighting lift. Having further reviewed the specification it is clear that many of the items I have listed, did not form part of the specified work. For example, there was no requirement for a secondary power supply; the need for the lift to be in a separate fire compartment; the shaft to be protected from water ingress or the provision of an emergency trap door in the car roof. As such the works identified were not to modernise the lifts to meet the definition of a firefighting lift.

d. Apex's expectation was that these were matters which would have been dealt with by BYCL. They were not matters upon which Apex would be expected to comment. I can say that in all the years that I have been engaged in the lift industry, I cannot recall any instance where a request been made, or specification provided, which requires the replacement of existing lifts and installation of firefighting lifts, in existing local authority buildings.

e. If a new lift was to be installed in a high rise residential building once the "firefighting" lift requirement in the guidance was implemented and the specification of works produced by the lift consultant identified the same that is what would be provided.

f. I cannot comment on the state of knowledge of other parties. All I can say is that from the specification produced by BYCL it was clear that the lift in place and being modernised was not a fire-fighting lift.

Project 2 (2015 works to install four new lift entrances)

Question 11: Describe the nature of Apex Lift & Escalator Engineers' Limited ('Apex') involvement in Project 2 (including any post-works defect liability period).

Answer: Having reviewed the documentation retained in relation to this project I confirm that an instruction from Rydon's was received to undertake a site survey and produce a quotation for the installation of 4 additional lift entrances on two new floors. The site survey was carried out by Ray Murray at Apex, who is a repair sales consultant. Ray took a number of pre commencement photographs which are attached marked Exhibit "(WJ/9:)".

Thereafter the job would be costed following calls made to suppliers for necessary components and a quotation produced. I attach a copy of the same dated 1st August 2014 and this is attached marked Exhibit "(WJ/10: URN APX00001107)". Work would not commence until terms were agreed and a signed letter of intent was received from Rydons. A copy of that letter dated 12 February 2015 is attached marked Exhibit "(WJ/11: URN APX00001100)".

The job was then handed over to Gary Ager who was the Apex Project Manager at the time. He attended the pre start sub-contractor interview meeting at site and thereafter the pre start meetings. The specification for the works was limited and a copy of the same is attached marked Exhibit "(WJ/12: URN APX00001098)". In terms of the actual delivery of the works, Gary Ager was responsible at the time and I believe he will be able to assist the inquiry with further details.

Question 12: Please exhibit the final version of the contract pursuant to which Apex was engaged in respect of Project 2.

Answer: A copy of the contract is attached marked "(WJ/13: URN APX00007916)".

Question 13: How did Apex come to be engaged as the lift specialist contractor in relation to Project 2 at the Grenfell Tower (with reference to any tendering process undertaken);

Answer: Please see the response to question 11 above.

Question 14: Identify the party/parties with whom Apex entered into relationships in order to carry out its role, describing the purpose of those relationships. Please also set out which organisations and individuals Apex staff regularly had contact with respect to Project 2.

Answer: I was not involved in the delivery of the physical works and therefore was not aware of the specific detail relating to contractors and other parties engaged on the project. Others from Apex have been asked a similar question and will be better placed to assist the inquiry in this respect.

Question 15: Provide an outline of what Apex was required to do in relation to Project 2 and how these requirements were set out. Please further confirm:

- a. Prior to commencing its work on Project 2, did Apex consider whether the lifts were/remained compliant with the lifts guidance, including in respect of 'firefighting lifts' status?
- b. As part of Project 2, was Apex required to ensure the lifts' compliance with the standards for a 'firefighting lift' within lifts guidance?
- c. If not, did Apex consider that industry standards and/or the lifts guidance required the lifts in Grenfell Tower to meet the 'firefighting lift' standard?
- d. To the extent of your knowledge, did organisations and individuals involved with

the refurbishment of Grenfell Tower appreciate that the lifts did not meet the definition for a 'firefighting lift'?

e. If Apex considered that a firefighting lift was not provided for in the specifications but was required (having regard to the nature of the building and lifts guidance), what if any steps did Apex take to highlight this to other organisations?

Answer: Please see response to question 11 above.

a. The lift consultants are responsible for identifying the works to be undertaken and that the scope of tasks identified are in line with current legislation and guidance.

b. See response to a. above.

c. See response to a. above.

d. I cannot comment on the state of knowledge of other parties.

e. See response to a. above.

Question 16: What, if any, changes were made as part of Project 2 to the Fireman's Control subsystem (including switches) in place after Project 1's completion? Please set out the location of any switches and whether/how they were connected to the lifts.

Answer: None. As stated in response to question 11 above, no work was done to the Fireman's control switch.

Question 17: Did Apex test the Fireman's Control switch(es) to confirm they were fully operable on conclusion of Project 2 works? If so, what was the result and how was this recorded (please exhibit any relevant certificates)?

Answer: I am unaware of the exact nature of the tests that were undertaken at the conclusion of the works. I understand that Gary Ager is providing a statement to the Inquiry and would be better able to answer this question.

Question 18: What is Apex's expectation for sufficient maintenance/testing of a Fireman's Control Switch following the completion of Apex's Project 2 work (e.g. by an incumbent maintenance provider)? In particular, should any maintenance/testing involve the insertion of a drop key, activation of the Switch and observing the effect on the lifts, rather than just a visual inspection of the Switch? Please exhibit/reference the O&M Manual if appropriate.

Answer: The works that were undertaken by Apex did not require there to be any maintenance or testing of the lift once the works were complete, If Apex had been asked to undertake such testing and/or maintenance this would be in accordance with the RBKC maintenance requirements. This would have involved testing by insertion of a drop key and activation of the switch.

Projects 1 and 2

Question 19: What, if any, measures were put in place by Apex to prevent:

- a. The lift car, the lift well and the lift motor room filling up with smoke in the event of a fire;

- b. Providing a supply of clean air in a standard pressurisation system within the lift shafts, to prevent smoke ingress.

Answer:

- a. In relation to project 1, the specification at section 3B.11 required :
‘The Contractor shall provide cooling either by air conditioning, chiller unit or low velocity extract fan to achieve sufficient cooling to maintain the machine room equipment at the Sub Contractor’s designed operating temperature limits but in no event to exceed 40°C.’. A photograph showing the extractor fan in the motor room marked **Exhibit “WJ 14:)”** is attached.
- b. No steps were undertaken given a) the nature of the specification for project 1, and b) the very limited nature of work that was to be undertaken by Apex in project 2

Question 20: Please set out full details (make, model, supplier) of the fire control switches installed by Apex as part of Project 1 and/or Project 2. Please provide photographs of the switches installed at Grenfell Tower or equivalent units.

Answer: In relation to project 1, only one switch was put into place on the ground floor as shown in the GA drawings as referred to as“(WJ/4; URN APX00000116)”. I cannot now locate any documentation in relation to the make, model and supplier of the fire control switch.

As regards to project 2, no switch was installed by Apex.

Question 21: Did Apex have concerns, at any point in time, about whether the Grenfell Tower lifts were compliant with industry standards, lifts guidance or otherwise fully operable (including in respect of the Fireman’s Control subsystem)? If so, how and to whom were these concerns expressed? What, if any, remedial action was taken (insofar as this is within your knowledge)?

Answer: Please see the responses that I have already provided above in answer to questions 9g; 10 e,f; 12 b,c,d and 15a,b,c.

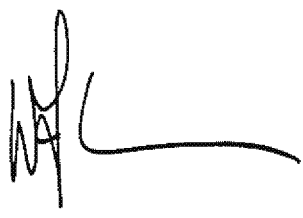
Question 22: If Apex considers that it was not its responsibility to ensure compliance with the lifts guidance (such as in respect of the lifts being ‘firefighting lifts’), whose responsibility was it?

Answer: The lift consultants in each project are responsible for the production of the designs for work to be carried out. It is at that stage that decisions need to be made by the consultant as to the applicability of relevant guidance and this should be translated into the specification document.

Statement of Truth

I believe that the contents of this statement are true to the best of my knowledge and belief.

I am willing for this statement to form part of the evidence before the Inquiry and published on the Inquiry’s website.

Signed 

Dated 29th October 2019