

# OPUS 2

## INTERNATIONAL

Grenfell Tower Inquiry

Day 35

September 14, 2020

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1 Monday, 14 September 2020  
 2 (10.00 am)  
 3 (Proceedings delayed)  
 4 (10.05 am)  
 5 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to  
 6 today's hearing. Today we're going to hear some more  
 7 witnesses from Harley.  
 8 Yes, Mr Millett.  
 9 MR MILLETT: Yes. Mr Chairman, good morning. We're going  
 10 to hear from Mr Mike Albiston, please. Can we please  
 11 call Mr Albiston.  
 12 MR MIKE ALBISTON (affirmed)  
 13 SIR MARTIN MOORE-BICK: Thank you very much, Mr Albiston.  
 14 Sit down and make yourself comfortable. All right?  
 15 Yes, Mr Millett.  
 16 Questions from COUNSEL TO THE INQUIRY  
 17 MR MILLETT: Mr Albiston, good morning. Thank you very much  
 18 for attending today to give evidence to the Inquiry, we  
 19 are extremely grateful to you.  
 20 If you have any difficulty understanding any of my  
 21 questions, or you would like me to ask them again, I'll  
 22 do that or I will rephrase the question.  
 23 Can I please also ask you to keep your voice up so  
 24 that the transcriber, who sits to your right, can hear  
 25 clearly what you're saying, and I should also say that

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1 a nod or a shake of the head doesn't get down on to the  
 2 transcript, so if the answer is yes or no, please say  
 3 yes or no and don't nod or shake your head, please.  
 4 A. Yes, thank you.  
 5 Q. Now, you have made a witness statement for the Inquiry  
 6 dated 8 November 2018. It's in a folder on the desk in  
 7 front of you, if you want to look at the hard copy, or  
 8 it'll be on the screen in front of you. It is  
 9 {HAR00010151}, please.  
 10 Is that your statement, can you confirm?  
 11 A. It is, yes.  
 12 Q. Can you please go to page 15 {HAR00010151/15}. Is that  
 13 your signature?  
 14 A. It is, yes.  
 15 Q. Have you read this statement recently?  
 16 A. I have.  
 17 Q. Can you confirm that the contents are true?  
 18 A. They are true, yes.  
 19 Q. Thank you.  
 20 Have you discussed your statement or the evidence  
 21 you're going to give today before coming here today?  
 22 A. No, I haven't.  
 23 Q. Thank you.  
 24 Now, I want to start with some questions about your  
 25 background, please.

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1 You began work in the construction industry,  
 2 I think, in 1983 as a trainee quantity surveyor.  
 3 A. That's right, yes.  
 4 Q. And you received a diploma in quantity surveying in  
 5 1994, I think.  
 6 A. That's right, yes.  
 7 Q. Since that time, I think you have worked as an  
 8 estimator; is that right?  
 9 A. That's right, yes.  
 10 Q. Can you provide us with a brief description of what that  
 11 role entails?  
 12 A. Basically, when tender enquiries are received, I go  
 13 through the documents, the drawings, do a measure of the  
 14 materials needed on that project, contact suppliers,  
 15 material suppliers, to get the prices, and compile the  
 16 quotation for submission to the main contractor or  
 17 an architect.  
 18 Q. That would involve also pricing jobs in order to tender  
 19 for projects, would it?  
 20 A. That's right, yes, it basically means like compiling the  
 21 prices from other material suppliers.  
 22 Q. Would that involve consideration of things like the cost  
 23 of materials, the cost of fabrication, cost of design  
 24 works?  
 25 A. That's right, it's all costs, really.

3

1 Q. All costs?  
 2 A. Yeah.  
 3 SIR MARTIN MOORE-BICK: Mr Millett, I'm sorry to interrupt  
 4 you so soon, but my transcript is not running. Is yours  
 5 running?  
 6 MR MILLETT: No, it isn't, and I was going to mention that  
 7 if it didn't spring into life.  
 8 SIR MARTIN MOORE-BICK: Would it be possible to look into  
 9 that? Because there are a lot of other people who are  
 10 seeking to follow the transcript as well.  
 11 MR RENTEURS: My transcript is working.  
 12 SIR MARTIN MOORE-BICK: Oh, we see you are favoured.  
 13 Do you have any idea where the problem may lie?  
 14 MS ISTEPHAN: Mine isn't working.  
 15 MR MILLETT: Mr Albiston, we will take a short technical  
 16 pause.  
 17 SIR MARTIN MOORE-BICK: I'm sorry about this, Mr Albiston,  
 18 but some people find it very useful to have the  
 19 transcript running in front of them.  
 20 MR MILLETT: I think, Mr Chairman, the remote access to the  
 21 transcript is working but that in the room isn't.  
 22 Thank you.  
 23 (Pause)  
 24 MR MILLETT: Solved, thank you.  
 25 SIR MARTIN MOORE-BICK: Good. Thank you very much indeed.

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1 Right, sorry about that. We are ready to go on.  
 2 MR MILLETT: Mr Chairman, thank you.  
 3 Now, I want to ask you some questions about your  
 4 role in general at Harley.  
 5 You say that you began working at Harley Curtain  
 6 Wall in 2013; is that right?  
 7 A. That's right, yes.  
 8 Q. When in 2013, do you remember?  
 9 A. It was the beginning of October.  
 10 Q. Beginning of October?  
 11 A. That's right.  
 12 Q. Before that, you had worked for Astralite .  
 13 A. That's right, yes.  
 14 Q. So you went from Astralite to Harley, did you?  
 15 A. There was a period of about a year when I was not  
 16 working, but yeah, I went -- there was no jobs in  
 17 between that.  
 18 Q. I see, okay.  
 19 At Astralite , you were working on jobs of a value  
 20 between something like £50,000 and £750,000.  
 21 A. That's right, yes.  
 22 Q. Was Harley a larger organisation than Astralite ?  
 23 A. It was similar in size. I think the big difference was  
 24 that Astralite was more of a fabricator of materials  
 25 like curtain walling, whereas Harley bought in all their

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1 materials, so they only -- just supplied the service of  
 2 actually installing the products.  
 3 Q. I see.  
 4 Would it be fair to say that, after you joined  
 5 Harley in October 2013, you were dealing predominantly  
 6 with projects of a much higher value than the projects  
 7 you were dealing with when you were at Astralite ?  
 8 A. Yes, I would say that, yes.  
 9 Q. Were you provided with any training by Harley when you  
 10 arrived?  
 11 A. No.  
 12 Q. Were you provided with any supervision to make sure that  
 13 your work on these larger projects was suitable?  
 14 A. Only really that when I prepared a quotation, it would  
 15 be checked by Ray Bailey or Mark Harris before it went  
 16 out.  
 17 Q. I see.  
 18 How many projects did you work on at Harley before  
 19 working on Grenfell Tower?  
 20 A. Possibly about two or three.  
 21 Q. I see. Can you name those?  
 22 A. I believe one was Great Arthur House, I think it was  
 23 called, which is near Golden Square, which is  
 24 a tower block, and there may have been a small curtain  
 25 wall project, I can't recall the name of it.

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1 Q. Right.  
 2 You say Great Arthur House was a tower block; did it  
 3 exceed 18 metres in height?  
 4 A. I believe it did, but it wasn't clad. It was more  
 5 windows and glass cladding, it wasn't actually any ACM  
 6 or aluminium cladding.  
 7 Q. Was it residential?  
 8 A. It was residential, yes.  
 9 Q. Was Grenfell Tower the largest project on which you had  
 10 ever worked?  
 11 A. Possibly, yes. I can't recall. It was, you know -- I'd  
 12 worked on a lot of projects at my previous jobs, but it  
 13 probably was one of the largest ones, yes.  
 14 Q. Before you would ordinarily provide a price on any  
 15 project, would you need to consider the  
 16 NBS specification for it?  
 17 A. Yes, I would.  
 18 Q. And also any drawings prepared by the architect?  
 19 A. That's right, yes.  
 20 Q. What about employer's requirements, would you consider  
 21 those as well?  
 22 A. I would briefly look through those, but they would be  
 23 more of a job that Mark Harris or Ray Bailey would look  
 24 into.  
 25 Q. Right.

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1 Is the reason you looked at what you did look at  
 2 that, without that information, you wouldn't be able to  
 3 consider what Harley was required to do for that  
 4 particular job?  
 5 A. That's right, yes.  
 6 Q. Yes.  
 7 So is it fair to say that, as an estimator, you  
 8 would have to have a broad knowledge of design in order  
 9 to be able to price the works accurately?  
 10 A. Yes, obviously you've got drawings sort of to follow to  
 11 get measures off of, but yes, pretty much.  
 12 Q. In general terms, would you agree that -- tell me if  
 13 this is right or wrong -- your aim would be to provide  
 14 a quotation that was competitive, but also maintain as  
 15 large a profit margin for Harley as possible?  
 16 A. Yes, it would.  
 17 Q. So when you were looking for costings, would you also  
 18 consider whether the job could be done for less money  
 19 using alternative products?  
 20 A. Possibly, but then it was really down to the NBS what  
 21 was specified in that really, so I would follow that  
 22 first-hand.  
 23 Q. Right.  
 24 Just following up on that answer, does that tell us  
 25 that you, in estimating, were confined or constrained by

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1 what the NBS told you?  
 2 A. Pretty much, yeah, unless I was instructed otherwise.  
 3 Q. Who would normally instruct you otherwise?  
 4 A. That would be Ray Bailey or Mark Harris.  
 5 Q. Generally, what would be the reasons for instructing you  
 6 otherwise?  
 7 A. Well, for example, on Grenfell Tower we specified  
 8 a different window system from the specified, which was  
 9 Wicon, and we specified -- we quoted for  
 10 Metal Technology, which was a sort of product that  
 11 Harley's worked with extensively.  
 12 Q. When doing the estimating, would it be your job to make  
 13 a selection of alternative products or simply to cost  
 14 what you were told to cost?  
 15 A. Just cost what I was told to cost.  
 16 Q. Where you did choose alternative products, would that  
 17 process extend to assessing whether the alternative  
 18 products were compliant with the Building Regulations  
 19 and associated guidance?  
 20 A. I wouldn't be choosing them, so I would just be told  
 21 what they were.  
 22 Q. I see.  
 23 Did Harley at any stage provide you with any  
 24 training or CPD to assist you with your role?  
 25 A. No.

1 Q. Right. Did you yourself undertake any training yourself  
 2 to get up to date with or familiar with the  
 3 Building Regulations, for example?  
 4 A. No.  
 5 Q. What about statutory or industry guidance?  
 6 A. No.  
 7 Q. What about best practice within the façade industry?  
 8 A. No.  
 9 Q. Does that tell us that you didn't keep abreast of  
 10 general developments in the cladding industry?  
 11 A. I would -- yeah, I would keep abreast of it in the news  
 12 or, you know, in the construction news, but I wouldn't  
 13 actually be trained on that.  
 14 Q. I see. So you say construction news; does that refer to  
 15 particular publications, specialist publications?  
 16 A. Yeah, like Building Magazine, Construction News, things  
 17 like that really, but not in great detail.  
 18 Q. Right. Would you look at those regularly or just  
 19 whenever the fancy took you?  
 20 A. Whenever, really. It wasn't really -- it wasn't  
 21 necessary to my job to actually keep that fully informed  
 22 of that sort of information.  
 23 Q. Yes, I see.  
 24 Turning to your role at Grenfell, in your role as  
 25 estimator on the Grenfell Tower project, you considered

1 all the elements, I think, that Harley was being asked  
 2 to subcontract and would provide a price for which  
 3 Harley was to do that work; is that right?  
 4 A. That's right, yes.  
 5 Q. Now, if you can go to paragraph 8, please, of your  
 6 statement, bottom of page 2 {HAR00010151/2}, you say:  
 7 "My involvement with the refurbishment works carried  
 8 out at Grenfell Tower was to produce a quotation for  
 9 Harley's scope of works based on the tender documents  
 10 received from the potential main contractors, which  
 11 included an NBS specification and architects' design  
 12 drawings."  
 13 Would your work be done in order to tender for the  
 14 project?  
 15 A. That's right, yes.  
 16 Q. Would it be fair to say that your involvement was,  
 17 therefore, predominantly in the pre-contractual stage?  
 18 A. Right, yes, it was.  
 19 Q. Did you receive a tender package from each of the main  
 20 contractors who were tendering for the works?  
 21 A. I believe I did, yes.  
 22 Q. And did each of those tenderers provide the  
 23 NBS specification?  
 24 A. They would have done, yes.  
 25 Q. I see, and then you would have looked at those for each

1 potential contractor?  
 2 A. Yeah, every NBS would be the same document anyway.  
 3 Q. Yes, I see.  
 4 Would the same apply to drawings which had been  
 5 created by Studio E at that stage?  
 6 A. Again, yes, it would be the same document.  
 7 Q. Now, when you got the tender package from the main  
 8 contractors -- well, sorry, there is a prior question.  
 9 Do you remember how many tender packages you looked  
 10 at from different potential main contractors?  
 11 A. I only remember from just seeing the names on the -- on  
 12 my transcript, so that was probably the -- that was the  
 13 amount we got.  
 14 Q. At paragraph 7, I think --  
 15 A. Yes, that's right.  
 16 Q. Did you get -- I think you say you did -- a tender  
 17 package from all or each of Rydon, Wates, Mulalley,  
 18 Durkan and Keepmoat?  
 19 A. That's right, yes.  
 20 Q. I see.  
 21 Did you provide estimates and quotations for each of  
 22 those potential main contractors?  
 23 A. I believe, from memory, that -- I think Wates may have  
 24 pulled out before tender submission, so it would have  
 25 been just the others.

1 Q. Right.  
 2 When you got the tender package from any of these  
 3 potential main contractors, did you form an impression,  
 4 when looking at them, about the nature of the documents  
 5 you were provided with?  
 6 A. In what way, sorry?  
 7 Q. Well, were they more or less detailed or prescriptive  
 8 than normal in your experience to date?  
 9 A. They were probably more on the high side of being,  
 10 you know, detailed than normal.  
 11 Q. I see. So more detailed than you would normally have  
 12 seen in the past?  
 13 A. That's right, but NBS documents usually are quite  
 14 detailed, but the drawings were quite detailed.  
 15 Q. I see.  
 16 Now, I want to turn to look in a little bit more  
 17 detail about your involvement pre-NBS specification.  
 18 Can we turn the page in your statement, please, to  
 19 page 3 {HAR00010151/3}, paragraph 9, and you say there:  
 20 "My work on the project began in December 2013 when  
 21 the tenders were received from a number of potential  
 22 main contractors. I reviewed and assessed the tender  
 23 documents and built up a cost estimate based on the  
 24 specification and drawings."  
 25 Is it quite accurate to say that your work began on

1 the project in December 2013?  
 2 A. That's right, yes, when the tender enquiries were  
 3 received.  
 4 Q. Well, let's just explore that a little more closely.  
 5 Can we please look first to {HAR00005555}. This is  
 6 an email from Mark Harris to Tomas Rek at Studio E dated  
 7 1 November 2013 and it concerned pricing, as you can see  
 8 down the email string, for zinc cladding, you see down  
 9 the page. And it's a series of emails, and they go over  
 10 this page, but you can see, running your eye up from the  
 11 bottom of page 1 up, the subject is zinc cladding.  
 12 Now, this was, as we can see from the date, before  
 13 the NBS specification was received by Harley; correct?  
 14 A. Yes.  
 15 Q. And you can see from the top email that you are copied  
 16 in by Mark Harris in his reply to Tomas Rek on that  
 17 date, 1 November.  
 18 A. That's right, yes.  
 19 Q. Was this your first involvement in the Grenfell Tower  
 20 refurbishment project, do you think?  
 21 A. It was probably the first time I was actually aware of  
 22 the project, but I wouldn't say I was actually involved  
 23 with it.  
 24 Q. What caused you to be involved in the project from this  
 25 point?

1 A. When we received the tender documents in December.  
 2 Q. That wasn't quite my question. Let me ask it  
 3 a different way.  
 4 How come you got involved at this point by  
 5 Mark Harris on 1 November 2013?  
 6 A. Right. Well, knowing that Grenfell was going to come  
 7 out for tender in December, Mark copied me in to the  
 8 emails so I could put it into the document file, just so  
 9 it was ready for, you know, my job to actually price, so  
 10 I had the information there already.  
 11 Q. I see.  
 12 Shortly before this email, we know that Mark Harris  
 13 had prepared an outline budget for Studio E following  
 14 a meeting that he had attended with Ray Bailey, and  
 15 I just want to show that to you, if I can. It's at  
 16 {SEA00002275}. This is dated 18 October 2013. Just  
 17 have a look at it, if you would, Mr Albiston.  
 18 Just looking at it there on the screen, do you  
 19 remember this document from the time?  
 20 A. Yes, I do.  
 21 Q. Do you remember whether you had any involvement in  
 22 preparing it?  
 23 A. No, I didn't.  
 24 Q. You didn't.  
 25 When was the first time, to the best of your

1 recollection, that you saw this document?  
 2 A. It was probably around the time of receiving the tender,  
 3 so it would have been late November, early December.  
 4 Q. I see.  
 5 Now, Mark Harris told the Inquiry that, Mr Albiston,  
 6 you drew this up in October 2013. Is that wrong?  
 7 A. Yes, I believe it is. As I said, I didn't have any  
 8 involvement in Grenfell Tower before December.  
 9 Q. Right. Can you explain how, without your help, Mr --  
 10 well, let me ask it again a slightly different way.  
 11 Do you know from your own knowledge who drew this  
 12 document up if it wasn't you?  
 13 A. It was probably Mark Harris and Ray Bailey between them.  
 14 Q. Right. You say probably; how sure are you about that?  
 15 A. Probably 100%.  
 16 Q. Right.  
 17 Do you know where they would have got the figures  
 18 from in respect of, for example, the first item down,  
 19 Reynobond zinc cassette rainscreen?  
 20 A. Probably from CEP or Alcoa.  
 21 Q. Right. Okay.  
 22 Do you know from your own knowledge, looking down  
 23 the first page there, why Reynobond products were being  
 24 proposed and no other products at that stage?  
 25 A. I don't know, I'm afraid.

1 Q. Are you able to explain why, although prices include  
 2 insulation, there is no insulation product referred to?  
 3 A. I think really insulation, there are different products  
 4 available which can be obviously used, so I think there  
 5 was nothing special at that time.  
 6 Q. I see.  
 7 Are you able to identify, even now, what insulation  
 8 product formed the basis or was included in any of these  
 9 numbers where insulation is referred to?  
 10 A. I don't know, because, you know, it just says  
 11 "insulation", so I don't know what product was actually  
 12 used there.  
 13 Q. If you go to page 2 {SEA00002275/2}, I want to try one  
 14 thing out with you, if I can. You will see under  
 15 "Exclusions" towards the bottom of page 2, four entries  
 16 up from the bottom:  
 17 "No allowance for fire rated products."  
 18 When you did first see this document, what did you  
 19 understand that to be referring to?  
 20 A. Sorry ...  
 21 Right, that's probably referring to windows and  
 22 curtain walling, so there's no sort of fire rated  
 23 products for that.  
 24 Q. I see.  
 25 Can I ask you to look at {HAR00005461}, please.

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1 Now, this is an email dated 4 October from Bruce Sounes  
 2 of Studio E to Mark Harris copied to Ray Bailey. Now,  
 3 you're not copied in on it, possibly because you had  
 4 only just arrived at this time.  
 5 In the third paragraph down, it says:  
 6 "The clients response to your budget was 'what about  
 7 aluminium?' We haven't had samples or cost back from  
 8 Nedzink but this could be ideal if it eliminates the  
 9 need for fabricated trays and is true zinc ..."  
 10 Then there is a reference to the NedZink website.  
 11 Then it goes on to say:  
 12 "Would it be possible to come back with budget  
 13 costs? Or what would the material cost uplift be for a  
 14 Nova composite versus a metallic/faux-zinc Reynobond  
 15 panel?"  
 16 I know you're not copied in on this and you had,  
 17 I think, just arrived at Harley at the time, but were  
 18 you made aware either of this email specifically or of  
 19 the discussion at the time about NedZink?  
 20 A. No, I can't recall any particular discussion about it.  
 21 Q. Right.  
 22 Did Mr Harris ever ask you to source quotes for  
 23 a NedZink panel?  
 24 A. I don't believe he did, no.  
 25 Q. Do you know why the October 2013 budget that I've just

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1 shown you only contained Reynobond options when, as we  
 2 can see from this document, two weeks earlier the  
 3 architects had made it plain that they had wanted to  
 4 investigate the NedZink option?  
 5 A. I don't know.  
 6 Q. Do you know why the detailed budget spreadsheet dated  
 7 18 October, so after you had arrived, was drawn up  
 8 without your involvement?  
 9 A. Because it was at budget stage and I was working on  
 10 other projects at that time, so I couldn't actually  
 11 devote my time to doing that budget. As I say, I had  
 12 only just arrived, so really Mark and Ray knew budgets  
 13 that they wanted to put out for these projects.  
 14 Q. Can we look at {HAR00005444}, please. This is an email  
 15 from Mark Harris to Tomas Rek of Studio E on  
 16 7 November 2013, as you can see, copied to Ray Bailey  
 17 and also to you, Mr Albiston. Do you see that?  
 18 A. Yes, I do.  
 19 Q. "Good morning Tomas.  
 20 "A response has been received at last from KME,  
 21 although I'm not sure it tells us a great deal. All  
 22 that has been provided, is a base m2 rate for panel  
 23 only, ex-works. That must have taken all of 10 minutes  
 24 to think about, so quite why it's taken them 2 weeks to  
 25 provide it, is a mystery to me!"

19

1 Now, the KME panel that's referred to there was  
 2 a Proteus panel, I think, wasn't it?  
 3 A. That's right, yes.  
 4 Q. Yes, and in fact we can see that a bit lower down the  
 5 email.  
 6 Do you know why it was that Mr Harris was obtaining  
 7 quotes from KME for the Proteus zinc panel rather than  
 8 you, as the estimator?  
 9 A. Again, really just timescales. I was tied up with  
 10 actually doing other projects, pricing those, so Mark  
 11 was doing these.  
 12 Q. Right. Why were you copied in on this email, then, if  
 13 you were tied up with --  
 14 A. Because of my future involvement with Grenfell, actually  
 15 doing the actual tenders.  
 16 Q. I see.  
 17 Now, he goes on to say, under the reference to  
 18 Proteus HR composite:  
 19 "Quite what finish this is based on, I have no idea  
 20 (due to lack of information). I have to say, from a  
 21 Harley selfish point of view, our preference would be to  
 22 use ACM. It's tried & tested (on many Harley projects),  
 23 and we are confident in the cost base."  
 24 What impact did that view of Mr Harris' have on you  
 25 at this time?

20

1 A. In what way, sorry?  
 2 Q. Let me ask it more specifically : when you came  
 3 eventually to price the Harley work or Harley job for  
 4 Grenfell, were you influenced in your pricing as  
 5 a result of Harley's preference here as expressed for  
 6 ACM?  
 7 A. No, because the NBS was specifying the Proteus, and  
 8 I think there was options for ACM, but I was just  
 9 pricing as per the specification document.  
 10 Q. Can we go to {SEA00009997}, please. Here we can see  
 11 that, two or so weeks later on 21 November, Mark Harris  
 12 sends an email to Bruce Sounes copied to you and  
 13 Ray Bailey. Do you see that?  
 14 A. Yes, I do.  
 15 Q. And that again relates to Reynobond pricing, and we can  
 16 see a little bit lower down in the email that he says:  
 17 "ACM current 'standard rate face-fixed on the wall -  
 18 £187.50 [per square metre] ...  
 19 "ACM current 'standard' rate cassette on the wall -  
 20 £232.50 [per square metre] ..."  
 21 Had Reynobond, to your knowledge, provided prices  
 22 for the Grenfell project for you to build up these  
 23 prices quoted to the client?  
 24 A. I hadn't seen any prices, but, again, I was not putting  
 25 the prices together, so I wouldn't have seen them.

21

1 Q. Again, was the reason you were copied into this email  
 2 really in readiness --  
 3 A. That's right, yes.  
 4 Q. -- for jumping on to the Grenfell job, to do the  
 5 estimation work for that?  
 6 A. That's right, yes.  
 7 Q. I see.  
 8 Can I show you another email, the same day,  
 9 {HAR00005512}, please. This is an email from  
 10 Debbie French to Mark Harris, as I say, of the same day,  
 11 21 November 2013, and it responds to an email, I think,  
 12 from Mark Harris of 8 November. So looking at  
 13 Mark Harris' email of 8 November to her, "Morning Deb",  
 14 do you see, halfway down?  
 15 A. Yes.  
 16 Q. "Bruce at Studio E has been talking with us about  
 17 options for the cladding.  
 18 "He asked us for guide rates on the following ..."  
 19 You can see there are four Reynobond finishes there:  
 20 "How much more per m2 would these colours be over  
 21 and above your standard range?"  
 22 You're, I think, copied in on that as well. It was  
 23 actually to Deborah French copied to you.  
 24 Do you remember seeing this email at the time?  
 25 A. I would have done, yes.

22

1 Q. Again, why were you being copied in on this? Was it  
 2 because you were being readied for the --  
 3 A. That's right, yes.  
 4 Q. -- eventual NBS spec?  
 5 Then we see the response from Deborah French back to  
 6 Mark Harris, not copied to you:  
 7 "Hi Mark  
 8 "As discussed and sorry for the delay.  
 9 "For the colours shown below we would offer an  
 10 approx rate to our approved fabricators of £32.00 -  
 11 35.00m2.  
 12 "Let me know if you need any other details ."  
 13 Do you know -- and I know you didn't necessarily --  
 14 well, first of all, did you see this email at the time  
 15 or did you discuss it with Mr Harris at the time, do you  
 16 think?  
 17 A. I wasn't copied in. It may have been something I might  
 18 have been forwarded or a printed copy may have been  
 19 given over to me.  
 20 Q. Right. Does it ring a bell with you?  
 21 A. I am afraid I can't recall.  
 22 Q. Okay.  
 23 Do you know why these quotations had been obtained  
 24 by Mr Harris at this stage now -- we're three-quarters  
 25 of the way through November -- and not by you, as the

23

1 estimator?  
 2 A. Because I was, again, pricing other projects at the  
 3 time.  
 4 Q. Right. Okay.  
 5 So how much positive involvement did you have?  
 6 We've seen you receiving a number of emails, but how  
 7 much proactive involvement did you have on material  
 8 choice at this stage or by this stage?  
 9 A. No involvement at all, just -- rather than just --  
 10 I just received the emails, copied in. As I say,  
 11 I didn't properly look at Grenfell Tower until December.  
 12 Q. On what you could see, is it fair to say that, even  
 13 before the NBS specification was received as part of the  
 14 tender package, Harley was already giving input into the  
 15 products that should be specified, particularly in  
 16 relation to the rainscreen?  
 17 A. I think they were after options and different rainscreen  
 18 products, so that's what they were responding to.  
 19 Q. Right.  
 20 Was it your impression that Harley, and particularly  
 21 Mr Harris, was aiming to get Reynobond ACM included in  
 22 the NBS specification?  
 23 A. I don't think so, no.  
 24 Q. Were you aware that an FR core was available for  
 25 Reynobond ACM products?

24

1 A. No.  
 2 Q. Can we go back to your statement, paragraph 9, please,  
 3 page 3 {HAR00010151/3}, and I want to look a little bit  
 4 more closely with you, please, at the obtaining of  
 5 quotes by you. You say at paragraph 9:  
 6 "My work on the project began in December 2013 when  
 7 the tenders were received from a number of potential  
 8 main contractors. I reviewed and assessed the tender  
 9 documents and built up a cost estimate based on the  
 10 specification and drawings."  
 11 We looked at that earlier on.  
 12 Would you agree that you needed to ensure that the  
 13 information was appropriately extracted from the  
 14 drawings and the specification in order to be able to  
 15 price the project reliably?  
 16 A. That's right, yes.  
 17 Q. And you would need to raise queries regarding specific  
 18 elements or to clarify anything if there was anything  
 19 there you didn't understand?  
 20 A. That's right, yes.  
 21 Q. If that was so, who would you go to, who would be your  
 22 first port of call?  
 23 A. As I say, probably Ray Bailey or Daniel Anketell-Jones,  
 24 being the technical manager.  
 25 Q. I see. Daniel Anketell-Jones, was he involved on this

25

1 project by the time you came to be involved more closely  
 2 in December 2013?  
 3 A. I believe he had a -- obviously a brief input into it,  
 4 but not in a full-on role at that stage.  
 5 Q. Right, I see.  
 6 Now, we can see that you began asking for quotations  
 7 or seeking quotations for various products in the  
 8 NBS specification on 11 December 2013.  
 9 Can you look at {SIG00000139}, please. This is  
 10 an email from you, Mr Albiston, to Matthew Irving, and  
 11 he is at SIG, isn't he?  
 12 A. That's right, yes.  
 13 Q. Or was.  
 14 I'm so sorry, I think in fact he is at KME,  
 15 actually. Sorry, I've put that to you wrong. He is  
 16 KME. Is that right?  
 17 A. That's the -- yeah, the Proteus cladding, isn't it?  
 18 Q. Yes.  
 19 A. Yes.  
 20 Q. Was this email the first email or first message sent out  
 21 by you from Harley in order to seek quotations for  
 22 rainscreen --  
 23 A. It possibly could be, looking at the dates, yes.  
 24 Q. Right.  
 25 Now, if Mr Harris had already obtained a budget

26

1 price from KME, as we've seen he did on or before  
 2 7 November 2013 -- we saw that email earlier on -- do  
 3 you know why you were sending this request again?  
 4 A. Because we had the drawings and an NBS specification  
 5 now, and I just thought I would put it out there again  
 6 just to make sure it was all as the drawings and  
 7 specified.  
 8 Q. Indeed. In the second paragraph, you say:  
 9 "Previously, you've given budget prices to  
 10 Mark Harris. In order for you to provide a firm  
 11 quotation for the rainscreen, what do you need from us?  
 12 I've attached elevation drawings and the NBS  
 13 specification for now."  
 14 And we see that you do attach those documents.  
 15 So was this you seeking a firm quotation as opposed  
 16 to really an estimate?  
 17 A. That's right, yes.  
 18 Q. I see.  
 19 Did you need to get KME to see the technical data in  
 20 order to be able to get a firm quote from them?  
 21 A. That's right, yes.  
 22 Q. Right. And that meant, did it, that you yourself needed  
 23 to understand the technical data?  
 24 A. Not myself, no. No.  
 25 Q. Right.

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1 Now, we can see you approaching KME here directly  
 2 for a quotation rather than going via a fabricator. Is  
 3 that right, first of all?  
 4 A. I believe KME actually fabricated as well, so the prices  
 5 for cladding would have come straight from them.  
 6 Q. I see. I was going to ask you, when considering the  
 7 Proteus HR panel, is that something that actually needed  
 8 fabrication?  
 9 A. I believe it did, yes, it was a similar sort of cladding  
 10 panel.  
 11 Q. I see, but I think you are telling us that KME supplied  
 12 them ready fabricated?  
 13 A. That's right, yes.  
 14 Q. Did they supply them ready fabricated in both cassette  
 15 and face-fixed form?  
 16 A. I can't recall.  
 17 Q. If we look at the quotation for the Proteus panel, this  
 18 is at {SIG00000042}, please.  
 19 This is dated 14 January 2014, we can see that from  
 20 two places at the top of the page there, and it would  
 21 expire on 14 February 2014, and it comes to Harley.  
 22 You're the customer contract reference. Do you see  
 23 that?  
 24 A. Yes.  
 25 Q. If we go to page 2 {SIG00000042/2} of this document, if

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1 you look at the bottom right-hand corner, you can see  
 2 that the total price in pounds for essentially a zinc  
 3 system, Proteus, was £546,264.  
 4 Was that the price that you used to generate  
 5 Harley's quotation so far as it was based on the Proteus  
 6 panels?  
 7 A. I can't recall without actually seeing my pricing  
 8 documents, but if I can just see the previous page  
 9 again, if possible.  
 10 Q. Yes, go back to page 1 {SIG0000042/1}, please, if we  
 11 could. You can see the build-up here, "Scope of  
 12 supply", zinc spandrel cladding and zinc column crown  
 13 panels.  
 14 A. Yeah.  
 15 Q. And it's all Proteus HR panels, flat .  
 16 A. Will you just move up slightly? Sorry.  
 17 Q. Move up slightly, would that --  
 18 A. That's it, that's fine, thank you.  
 19 I'm pretty sure it would have been based on that,  
 20 really. I may have just re-measured the areas, but it  
 21 would have been based on these rates .  
 22 Q. It would have been, okay.  
 23 Just to be clear, if you go to {RYD00002607}, this  
 24 is the quotation that Harley eventually gave Rydon.  
 25 Now, we can see it's 29 January 2014, so exactly halfway

1 between the date of issue and the date of expiry of the  
 2 KME quotation.  
 3 If we go to page 9 {RYD00002607/9} in that document,  
 4 we can see there is a cost summary there, and we can see  
 5 what you have quoted for the zinc column cladding and  
 6 crown, zinc rainscreen cladding to spandrel panels and  
 7 aluminium rainscreen cladding generally, three figures  
 8 there in the middle of that cost summary: for the zinc  
 9 column cladding and crown, £551,000-odd; for the zinc  
 10 rainscreen cladding to spandrel panels, £707,000-odd;  
 11 and aluminium rainscreen cladding generally,  
 12 £109,000-odd. That gives us a total, on our  
 13 calculations, of about £1.2 million. So we go from  
 14 £546,000 quoted by KME to £1.2 million-odd quoted in  
 15 total to Rydon.  
 16 Can you explain in rough terms how you got from  
 17 £546,000-odd to £1.2 million in total?  
 18 A. Well, basically, the cladding quote was for the panels  
 19 and sort of brackets, but then we would have to add on  
 20 insulation and some cladding rails as well, and also the  
 21 installation of the product as well.  
 22 Q. Right.  
 23 A. Plus the overheads and mark-up from Harley on that, so  
 24 that would account for that extra cost.  
 25 Q. I see. So your price of £1.2 million-odd in total for

1 that was an on-the-wall price --  
 2 A. That's right, yes.  
 3 Q. -- whereas the quotation from KME was what they call  
 4 ex-works, but already fabricated .  
 5 A. That's right, yes.  
 6 Q. But just for the materials?  
 7 A. That's right, yes.  
 8 Q. I follow .  
 9 Can we go back to your witness statement, please,  
 10 page 4 {HAR00010151/4}, paragraph 16. You say there:  
 11 "Decisions on specification changes were made by  
 12 Studio E, and communicated to Harley via Rydon. My  
 13 instructions to provide costings for such changes would  
 14 come to me from Ray Bailey or Mark Harris, although  
 15 ultimately we would provide alternative costings for  
 16 whatever material the architects wanted to use, provided  
 17 that it was something that was achievable and fit for  
 18 the intended purpose."  
 19 We can see those words there that you use.  
 20 Would you play any part in assessing whether the  
 21 products were fit for their intended purpose?  
 22 A. No, I wouldn't.  
 23 Q. Did anyone at Harley have that particular role?  
 24 A. Again, it would have been probably Ray Bailey or  
 25 Daniel Anketell-Jones in a technical role.

1 Q. If Mark Harris or Ray Bailey told you to price  
 2 a particular product, did you understand that it had  
 3 been checked in order to make sure that it was suitable?  
 4 A. Yes, I would have done, yes.  
 5 Q. Who did you think would do that checking?  
 6 A. Either Ray Bailey or Daniel Anketell-Jones.  
 7 Q. I see. So was it your expectation that anything in the  
 8 NBS specification would be checked by Ray Bailey or  
 9 Daniel Anketell-Jones for its suitability for  
 10 application on this project?  
 11 A. That's right, yes.  
 12 Q. Right. And by "fit for intended purpose", can you  
 13 explain what you mean?  
 14 A. Really just if it's actually suitable for its use on  
 15 a building.  
 16 Q. Did that include fitness from a fire safety perspective?  
 17 A. If it was -- if that was the purpose for it, but again,  
 18 you know, if it was actually for that purpose, it would  
 19 obviously have to be fit for that purpose.  
 20 Q. When you say "if it was for that purpose", can you  
 21 just --  
 22 A. For example, if it was like a fire exit on a building  
 23 and it needed to be a fire rated screen, a curtain wall  
 24 screen, it would have to be fit for that purpose.  
 25 Q. Was it your expectation that any particular product for

1 application on the project would be checked by either  
 2 Ray Bailey or Daniel Anketell-Jones?  
 3 A. That's right, yes, it would be.  
 4 Q. For fire safety?  
 5 A. I suppose so, yes, it would be all part of it.  
 6 Q. Right.  
 7 Now, at paragraph 31 of your statement, if we can go  
 8 to that, please, you will see on page 8 {HAR00010151/8}  
 9 there that you say:  
 10 "I have been an estimator for over twenty years  
 11 pricing projects involving curtain walling, windows and  
 12 cladding. Although I had not used these particular  
 13 products before, I had previously worked on projects  
 14 where other ACM products, such as Alucobond were used.  
 15 When I worked for Astralite, they used a fabricator  
 16 called Booth Muir Limited, and they mainly worked with  
 17 Alucobond."  
 18 Now, I think you're referring there, are you -- or  
 19 are you? -- to Reynobond ACM with a PE core when you say  
 20 "these particular products"?  
 21 A. That's right, yes.  
 22 Q. Are you also referring, when you say "these particular  
 23 products", to the KME Proteus HR?  
 24 A. Yes, as well, yes.  
 25 Q. So you had never used that before either?

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1 A. No.  
 2 Q. I see. What about Celotex RS5000 insulation?  
 3 A. Again, I think I actually say in my statement at 33 that  
 4 I can't remember if I actually worked on a project where  
 5 that was used. But again, at tender stage or estimating  
 6 stage, insulation is fairly generic, so it would have  
 7 been decided after a contract was won and actually  
 8 materials ordered.  
 9 Q. Very well. Well, we'll come back to RS5000 shortly,  
 10 I think.  
 11 You say that, as you do here, you had worked with  
 12 Alucobond products. On those previous projects where  
 13 you had done so, were they Alucobond ACM panels with  
 14 a PE core or another kind of core?  
 15 A. I can't recall, I'm afraid, sorry.  
 16 Q. Right.  
 17 Were you aware from the involvement you had had  
 18 previously with Alucobond that Alucobond ACM panels came  
 19 with an FR, fire retardant, core?  
 20 A. No.  
 21 Q. What about a mineral core? Were you aware that  
 22 Alucobond panels came with that?  
 23 A. No, I just thought that Alucobond was just one core and  
 24 that was it.  
 25 Q. One core --

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1 A. Yeah.  
 2 Q. -- and that was it, and that was PE, was it?  
 3 A. Yeah, it wasn't a choice between fire rated or  
 4 non-fire rated as such.  
 5 Q. So just PE as a --  
 6 A. That's right, yeah.  
 7 Q. -- single product?  
 8 Now, if, as you say, these products that you have  
 9 identified were new to you, did it occur to you that it  
 10 was even more important to familiarise yourself with  
 11 them and particularly their performance in a fire?  
 12 A. No, because it wasn't my role at the company to actually  
 13 check those items.  
 14 Q. Right. Just again to be absolutely crystal clear, whose  
 15 role at the time did you think that was?  
 16 A. It would have been again Ray Bailey or  
 17 Daniel Anketell-Jones.  
 18 Q. I want to ask you some questions about the regulatory  
 19 requirements, but these may not take long.  
 20 In general, were you yourself familiar with  
 21 schedule 1 to the Building Regulations?  
 22 A. No.  
 23 Q. Right. Would it follow that you weren't therefore  
 24 familiar with part B, fire safety?  
 25 A. That's right.

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1 Q. No.  
 2 Had you received any general training on fire safety  
 3 within clad buildings either before or during your time  
 4 at Harley?  
 5 A. No.  
 6 Q. Do I take it also that you were not familiar with the  
 7 CWCT guidance or technical notes published by the CWCT?  
 8 A. That's right, yeah.  
 9 Q. And similarly the BCA, the Building Control Alliance?  
 10 A. Yeah.  
 11 Q. Right.  
 12 Let's turn to the NBS specification. If you go,  
 13 please, to {SIG0000139}, please, we can see an email  
 14 from you on 11 December to Matthew Irving at KME. We've  
 15 looked at that before. We can see in it that you  
 16 forwarded to him a number of documents. One of those,  
 17 if we look at your email in the second paragraph and at  
 18 the attachments, is the NBS specification.  
 19 Now, the version then in circulation was dated  
 20 29 November 2013, and I don't need to go to that, but do  
 21 you remember when you first saw the NBS specification  
 22 prior to sending this email to Mr Irving?  
 23 A. It probably would have been when we received the tender  
 24 enquiries in December.  
 25 Q. I see. Do you remember who you received it from?

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1 A. It would have been the main contractors.  
 2 Q. I see.  
 3 A. So Rydons, et cetera.  
 4 Q. I see. So when you say the NBS specification, which  
 5 you're sending on to KME, you don't know which  
 6 particular main contractor had supplied that one to you,  
 7 they were all the same?  
 8 A. No, I would have just extracted that part of the NBS and  
 9 sent it to KME.  
 10 Q. I see.  
 11 Now, let's look at the NBS specification. This is  
 12 the one dated 29 November 2013, so this would have been  
 13 the one current at the time of this email. It's  
 14 {SEA00000153}, please.  
 15 We can see, if you look at the middle of page 2  
 16 {SEA00000153/2} that this is the version dated  
 17 29 November, as I say. Do you see that?  
 18 If we go then on to page 64 {SEA00000153/64}, we can  
 19 see on 64, clause 120, "Type(s) of rainscreen cladding",  
 20 and it sets out the specification which required pricing  
 21 for Proteus panels supplied by KME Architectural  
 22 Solutions; do you see that?  
 23 A. Yes, I do.  
 24 Q. If we go back a page to 63 {SEA00000153/63}, clause 11,  
 25 under "H92 Rainscreen cladding", "Information to be

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1 provided with tender", you can see that it says:  
 2 "In addition to the cladding specified in the below  
 3 clauses 120 & 123 submit comparative supply and install  
 4 costs per m2 of the whole cladding system for the  
 5 following alternative materials ..."  
 6 Then we can see what the alternatives are: there is  
 7 Reynobond in three finishes; Alucobond, Spectra, Sakura;  
 8 and zinc, Quartz Zinc. Do you see that?  
 9 A. Yes, I do.  
 10 Q. That's in addition to the Proteus panel which we saw  
 11 specified at clause 120.  
 12 Now, if we stay on page 63, at the top of that page,  
 13 you can see that it says that one of the matters to be  
 14 read with the preliminaries, in the second bullet point,  
 15 was that:  
 16 "The manufacturers noted within this specification  
 17 are indicative ..."  
 18 And then it says:  
 19 "... and may be substituted with similar or equal  
 20 alternatives."  
 21 When you got this document in December 2013, did you  
 22 note what it said there, that the manufacturers may be  
 23 substituted with similar or equal alternatives?  
 24 A. I possibly did. That's like a fairly standard clause in  
 25 NBS documents.

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1 Q. I see. What did you understand by the word  
 2 "indicative"?  
 3 A. It's like a guide, the sort of product that the  
 4 architect wants to use.  
 5 Q. Right.  
 6 When it says, "The manufacturers noted within this  
 7 specification are indicative", did you think that  
 8 applied only to the KME Proteus HR rainscreen, or also  
 9 to the alternatives, the Reynobond, the Alucobond, and  
 10 the zinc?  
 11 A. I don't think I had an opinion on that at the time,  
 12 really.  
 13 Q. I see.  
 14 Looking at the phrase "similar or equal", what did  
 15 you understand by that?  
 16 A. That normally means that the product's got to be of  
 17 similar performance.  
 18 Q. Similar performance. So did that mean that, where  
 19 a product was to be substituted, it had to be of similar  
 20 or equal performance standard to what was stipulated?  
 21 A. That's right, yes.  
 22 Q. And where it says "substituted", what did you understand  
 23 could be substituted for what?  
 24 A. Sorry, in what way?  
 25 Q. Well, did you understand that, for example, the

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1 Reynobond identified in clause 11 could be substituted  
 2 for the Proteus, provided it was of similar or equal  
 3 performance standard?  
 4 A. Not as such, because the Proteus was the main product  
 5 and the Reynobond was the alternative, so it would be  
 6 the other way around, really.  
 7 Q. Right. So to what products would the qualification, to  
 8 your understanding, "similar or equal" apply to?  
 9 A. Probably from the phrasing in the document it's for any  
 10 product, really.  
 11 Q. I see. So any product not within the specification at  
 12 all?  
 13 A. Sorry?  
 14 Q. Any product completely outside this specification?  
 15 A. No, well, it's referring to the products in the  
 16 specification, and obviously there are -- you know,  
 17 could be substituted by other manufacturers.  
 18 Q. Can I just see if I can get your understanding of the  
 19 comparative performances as between the zinc Proteus on  
 20 the one hand and the alternative Reynobond on the other.  
 21 Looking at the expression "may be substituted with  
 22 similar or equal alternatives", did you form any view at  
 23 the time as to whether Reynobond would perform the same  
 24 as the KME Proteus HR?  
 25 A. No, I can't comment on that because, as I say, I've got

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1 no technical training of those products.  
 2 Q. Right.  
 3 In respect of all of these rainscreen materials that  
 4 you were being asked to cost, did you take any steps to  
 5 ensure that they were suitable for use in an external  
 6 wall construction above 18 metres in height?  
 7 A. No, other than just passing on the document to either  
 8 the manufacturers or Ray Bailey and  
 9 Daniel Anketell-Jones to actually look at the technical  
 10 point of view.  
 11 Q. Again, does the same apply in relation to the insulation  
 12 material that was specified elsewhere in this document?  
 13 A. That's right, the whole document basically, yes.  
 14 Q. Did you discuss these materials with anybody when  
 15 costing them?  
 16 A. At Harley?  
 17 Q. Within Harley, yes.  
 18 A. Possibly, yes.  
 19 Q. Do you know who?  
 20 A. Probably either Mark Harris, Ray Bailey or Daniel.  
 21 Q. Right. Do you have a specific recollection of that?  
 22 A. No, because, you know, it happens on most projects,  
 23 so ...  
 24 Q. I see.  
 25 Can you go to paragraph 22 of your statement,

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1 please, on page 6 {HAR00010151/6}. I think you say  
 2 there:  
 3 "Beyond that, I am unable to comment as to the  
 4 manufacture of either Reynobond ACM or Celotex, because  
 5 my role was not a technical or design role, and so  
 6 I wasn't required to know the full details of the  
 7 manufacture or composition of these products."  
 8 Does that tell us that you weren't able to assess  
 9 whether they were fit for purpose, at least in terms of  
 10 fire safety?  
 11 A. That's right, because as I say, it wasn't my role at the  
 12 company to do those checks.  
 13 Q. Okay.  
 14 Can we go back, then, to clause 11 of the  
 15 NBS specification that we looked at a moment ago,  
 16 {SEA00000153/63}. This is the NBS specification of  
 17 29 November again, not the final version that came out  
 18 in January that we have been looking at most of the time  
 19 in this inquiry.  
 20 We can see here on this page, under clause 11  
 21 "Information to be provided with tender", that you were  
 22 required to provide a price for Reynobond metallic  
 23 standard and non-standard.  
 24 What did you understand was the difference between  
 25 standard and non-standard?

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1 A. It's basically the finish of the -- of the metallic  
 2 finish, either standard or non-standard. I think they  
 3 have a range of colours which are standard colours, and  
 4 then you get non-standard colours which are -- sometimes  
 5 cost -- cost on those.  
 6 Q. Can I ask you to look at the BBA certificate for  
 7 Reynobond panels. This is at {HAR00000934}, please.  
 8 This is the BBA certificate number 08/4510, first issue,  
 9 dated 14 January 2008.  
 10 Did you see this document when considering how to  
 11 quote for these panels, the Reynobond ACM panels?  
 12 A. No.  
 13 Q. Did you ever see this document during your work on the  
 14 Grenfell Tower project?  
 15 A. I believe it was provided by Alcoa on request from the  
 16 architects later on, but again, it would just be --  
 17 I was just copied in on an email and the document sent  
 18 on to the architect.  
 19 Q. Yes, that's 23 April 2014, sent by Debbie French to  
 20 Mark Harris. Does that ring a bell with you?  
 21 A. Yes, it does.  
 22 Q. You say you were copied in on that; did you read it when  
 23 you received it?  
 24 A. No.  
 25 Q. What did you do with it?

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1 A. I was just copied in to it, so I didn't actually --  
 2 I just filed it and, as I say, Mark Harris sent it on,  
 3 I believe, or it may have been myself, I can't remember.  
 4 Q. Why did you think you were being copied in on it?  
 5 A. Because, again, I was the point of contact for the  
 6 pricing at Grenfell Tower, so I was copied in on all  
 7 documents at that point.  
 8 Q. Did it occur to you that one of the reasons why you were  
 9 copied in on it is that you should read it?  
 10 A. No, because, again, my role wasn't that at the company,  
 11 wasn't a technical role, so I would not have to read  
 12 that document.  
 13 Q. What was the point of it being sent to you if you  
 14 weren't to read it?  
 15 A. Again, because it was a -- just keeping me in the loop,  
 16 basically, and I kept a file of all correspondence on  
 17 the project.  
 18 Q. Right.  
 19 Now, I know you didn't read this document at the  
 20 time, as you tell us, and perhaps there is not a lot of  
 21 point showing this to you, but the general question is:  
 22 were you aware, even at April 2014, when this document  
 23 was sent to you in copy, that there were two different  
 24 Reynobond ACM products, one with a standard PE core and  
 25 one with an FR or fire retardant core?

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1 A. No, I wasn't aware.  
 2 Q. Right.  
 3 Can we then look at {SEA00002275}, please. This is  
 4 a document we looked at earlier on this morning. It was  
 5 the 18 October outline budget for the external envelope,  
 6 "budget costs (cassette rainscreen)".  
 7 At this stage you can see that cassette is being  
 8 quoted for. Do you know why cassette was stipulated at  
 9 this stage rather than face-fixed, or rather budgeted  
 10 for rather than face-fixed?  
 11 A. No, I don't know.  
 12 Q. If you go to page 2 {SEA00002275/2}, we looked at the  
 13 exclusion for fire rated products and you said that was  
 14 for curtain walling and windows. Did you understand,  
 15 from your involvement, that there had been an exclusion  
 16 from the budget for all fire rated products?  
 17 A. In what regard?  
 18 Q. Well, fire rated products in the external wall  
 19 construction.  
 20 A. I wasn't aware, no.  
 21 Q. Okay. Nobody ever told you to budget or cost on the  
 22 basis that fire rated products, for example for the  
 23 rainscreen or for the insulation, were not to be costed?  
 24 A. What, on this particular document or in future projects?  
 25 Q. On this project.

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1 A. On this project, no.  
 2 Q. Can I then go to {CEP00000267}, and I'm going to ask you  
 3 some questions about your seeking of a quotation from  
 4 CEP.  
 5 A. Okay.  
 6 Q. This is an email of 21 January 2014 from Geof Blades at  
 7 CEP to you, copied to Mark Harris, in which he provides  
 8 a quotation for the fabrication of the cladding panels,  
 9 and he attaches a quote.  
 10 A. Okay.  
 11 Q. It looks from our documents that you only approached CEP  
 12 for a quotation for fabrication. Is that right?  
 13 A. I believe so, yes.  
 14 Q. Why is that?  
 15 A. Because CEP was the fabricator Harley used for the  
 16 rainscreen cladding products.  
 17 Q. Is that all rainscreen cladding products, regardless of  
 18 whether it was Reynobond or Alucobond or others?  
 19 A. I think -- I believe it was probably Alucobond,  
 20 Reynobond, maybe some other cladding products.  
 21 Q. Right. So CEP was the fabricator of choice for Harley,  
 22 is that what you are saying?  
 23 A. That's right, for those products, yes.  
 24 Q. You say "for those products", can I just check what you  
 25 mean?

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1 A. Yes, I believe obviously there's products they didn't  
 2 actually fabricate, so they couldn't actually provide  
 3 prices for those.  
 4 Q. Would it be normal only to approach one fabricator on  
 5 a cladding job?  
 6 A. Not particularly, no.  
 7 Q. So why on this one?  
 8 A. I think at that point, you know, I was new to the  
 9 company and you rely on being told who the companies  
 10 that the -- you know, your employer uses, so I was told  
 11 that CEP would provide a price for these, so that's who  
 12 I went to.  
 13 Q. I see. Who told you that?  
 14 A. It would have been either Ray Bailey or Mark Harris.  
 15 Q. Okay. Did they say why you should approach CEP and  
 16 nobody else?  
 17 A. No, really, just, you know, you get a list of suppliers  
 18 that Harley used over the years and that's the companies  
 19 you went to.  
 20 Q. And you didn't question that?  
 21 A. No, because most times, even in my previous employment,  
 22 you know, you build up a level of trust with certain  
 23 suppliers, they deliver on time, you know, they're  
 24 trustworthy in terms of, you know, providing a product,  
 25 so you just really go with those, the ones that you can,

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1 you know, you can trust basically.  
 2 Q. Did CEP only fabricate ACM panels?  
 3 A. What, in terms of cladding or ...?  
 4 Q. In terms of the rainscreen. I'm sorry, yes, when it  
 5 comes to rainscreen panels, did CEP only fabricate ACM  
 6 or did they do other panels?  
 7 A. I believe they did other panels, maybe a sort of --  
 8 I can't remember what it is, might be a HPL panel,  
 9 I think it is, but it was really ACM was the one we  
 10 obviously got quoted on this.  
 11 Q. HPL being high-pressure laminate?  
 12 A. Yes, that's right, yes.  
 13 Q. As far as zinc is concerned, I think you said earlier  
 14 that that would be fabricated by KME itself.  
 15 A. That's right, yes.  
 16 Q. So that wouldn't need to go to CEP?  
 17 A. I don't believe they actually did that product anyway,  
 18 so ...  
 19 Q. Right.  
 20 So would it be right that by only approaching CEP  
 21 for a quote, you were essentially providing a price  
 22 which assumed the rainscreen for Grenfell Tower was  
 23 going to be ACM?  
 24 A. No, because the ACM was an alternative to the Proteus at  
 25 that point.

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1 Q. Right.  
 2 Can we look at the email chain under which you  
 3 requested a quote. It's {CEP000000267/3}, please. If  
 4 we go down to page 3, we can see that, at the bottom of  
 5 the chain, there is an email from Geof Blades to you  
 6 dated 20 December 2013:  
 7 "Morning Mike,  
 8 "Following my telephone conversation with  
 9 Mark Harris yesterday, could you please forward your  
 10 window and curtain wall schedule. With regards the  
 11 rainscreen overcladding we are to offer our system based  
 12 on a cassette tray and face fixed ACM ie Reynobond, to  
 13 this could you please forward elevation drawings and any  
 14 other information you feel is relevant."  
 15 Were you made aware of that telephone conversation  
 16 on 19 December, the day before this email?  
 17 A. Other than just seeing it in the email there, I don't  
 18 recall this conversation, no.  
 19 Q. Do you know what Mr Harris said to Mr Blades?  
 20 A. No, I don't.  
 21 Q. To your knowledge, did Mark Harris instruct Geof Blades  
 22 to offer a system, as he says, based on a cassette tray  
 23 and face-fixed ACM, ie Reynobond?  
 24 A. I don't know, other than reading it in the email there.  
 25 Q. Did you instruct Mr Blades to offer such a system?

1 A. No, because I think probably on the email further on,  
 2 I just -- and you just sort of scroll up.  
 3 Q. Right.  
 4 A. But basically he says cassette tray and face-fixed so  
 5 I think that's what he offered.  
 6 Q. Do you know, because you received this at the time, why  
 7 Mark Harris had told Geof Blades that the ACM to be used  
 8 was Reynobond and not any of the other alternatives set  
 9 out in the NBS specification?  
 10 A. I don't know.  
 11 Q. Did it strike you as odd that he had narrowed down the  
 12 quotation that he was seeking only to that product and  
 13 not, for example, to include Alucobond as  
 14 an alternative?  
 15 A. Not really, no. At that point I was, as I say, new to  
 16 the company, so I don't think I had met Geof Blades, so  
 17 I didn't actually know what products CEP fabricated, so  
 18 it wouldn't have struck me as unusual.  
 19 Q. When you read the words "we are to offer our system",  
 20 did that strike you as a reference to an instruction,  
 21 essentially, from Harley to Mr Blades that the quotation  
 22 that was being sought was very specific and restricted  
 23 to cassette and face-fixed, ie Reynobond?  
 24 A. Not really, no. No.  
 25 Q. Can we then scroll up and look at pages 2

1 {CEP000000267/2} and 3 {CEP000000267/3} side by side.  
 2 If we look at the bottom of page 2, and the top of  
 3 page 3, we can see that it's an email from you dated  
 4 6 January 2014 back to Geof Blades, and over the top of  
 5 page 3 you say --  
 6 A. Sorry, I can't see the --  
 7 Q. No, there it is, top of page 3, "Hi Geof", do you see  
 8 that now?  
 9 A. Yes, I do.  
 10 Q. You say:  
 11 "Hi Geof  
 12 "Further to our telephone conversation this morning  
 13 please find attached schedules and NBS specifications  
 14 for the curtain wall and windows.  
 15 "I have also included the NBS specification for the  
 16 rainscreen and the elevation drawings. I will also send  
 17 you a link for further drawings in Dropbox.  
 18 "If you have any queries, then please contact me."  
 19 Did you have a conversation with Geof Blades on the  
 20 morning of 6 January 2014, as appears from this email?  
 21 A. I obviously did, yeah, if it says in the email.  
 22 Q. Do you remember that conversation?  
 23 A. No, I don't.  
 24 Q. Do you remember whether you told him, or do you have  
 25 a recollection specifically of telling him what to quote

1 for in respect of the rainscreen?  
 2 A. No, I don't remember. Again, he said previously what he  
 3 was going to be quoting for, so I didn't really raise  
 4 that with him.  
 5 Q. Right.  
 6 Now, you had sent him the entire NBS specification  
 7 and the elevation drawings, and we've already seen that  
 8 the NBS specification requested quotes for four  
 9 rainscreen products, Proteus, Reynobond, Alucobond and  
 10 Quartz Zinc by VMZinc. So were you expecting him to  
 11 provide quotations in respect of all of those, or at  
 12 least Reynobond, Alucobond and Quartz Zinc at this  
 13 stage?  
 14 A. Probably -- well, whatever he could quote for, really.  
 15 If he quoted for Reynobond, it would have just been  
 16 that.  
 17 Q. If we go then to the quote of 21 January 2014, which is  
 18 what he responds to, after a chaser from you, which  
 19 I think we can see on page 2. Can we go to that, it's  
 20 {CEP000000268}. This is the formal quotation from CEP,  
 21 addressed to you at Harley, dated 21 January 2014.  
 22 If we look at page 1, it says in the first  
 23 paragraph:  
 24 "Thank you for your enquiry ref the above project  
 25 [which is Grenfell Tower] and, we have pleasure in

1 confirming our quotation for the design, fabrication and  
 2 supply only of aluminium windows and rainscreen  
 3 overcladding, as laid out below.”  
 4 Then in the fifth paragraph down, “Rainscreen  
 5 Overcladding”, do you see that?  
 6 A. I do, yes.  
 7 Q. “Panels are to be manufactured utilising 4mm Reynobond  
 8 ACM.”  
 9 I just want to focus on the words “are to be  
 10 manufactured”.  
 11 Do you know why, despite the fact that you had sent  
 12 Mr Blades the whole of the NBS specification, which had  
 13 the four products, Proteus and then the three  
 14 alternatives, in it --  
 15 A. Yes.  
 16 Q. -- clause 11, as we’ve seen, do you know why Geof Blades  
 17 only provided a quote for the Reynobond ACM product?  
 18 A. I assume it’s because that’s the only product he  
 19 actually fabricated in terms of ACM rainscreen.  
 20 Q. Is it not because he had been told to do so, as we’ve  
 21 seen from the 20 December email, “we are to”?  
 22 A. I don’t know if he was told that or not, I just assume  
 23 that’s what he was -- that’s his product he fabricates.  
 24 Q. You see, it says here:  
 25 “Panels are to be manufactured utilising 4mm

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1 Reynobond ACM.”  
 2 When you saw this, did it not strike you as odd that  
 3 he was under the impression that he was only to quote  
 4 for 4-millimetre Reynobond ACM and not any of the other  
 5 products referred to in the NBS specification?  
 6 A. No, it didn’t strike me as strange.  
 7 Q. It didn’t strike you as strange?  
 8 A. No.  
 9 Q. Why didn’t it strike you as strange?  
 10 A. Because that’s obviously the product -- he only  
 11 fabricates that type of ACM.  
 12 Q. So did you understand that he was limiting himself to  
 13 quoting for a Reynobond ACM because that was the only  
 14 product he fabricated?  
 15 A. That’s right, yes.  
 16 Q. Did anyone tell you that?  
 17 A. I can’t remember if they did or not, but that’s the --  
 18 that’s my memory of it, basically, that’s the product he  
 19 fabricated.  
 20 Q. Right. Did you have a conversation with him about his  
 21 capability to fabricate other products, such as  
 22 Alucobond?  
 23 A. It’s possible I did but I can’t recall that.  
 24 Q. Right.  
 25 I think we know that CEP also fabricated Alucobond.

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1 Did it not cross your mind that when he was restricting  
 2 himself to Reynobond, that was over- restrictive and you  
 3 should ask him, “Can you please quote for Alucobond as  
 4 well”?  
 5 A. Well, you have just told me now that he quotes for  
 6 Alucobond, so that’s probably the first time I knew that  
 7 anyway, or at the time I wouldn’t have known that.  
 8 Q. All right.  
 9 It looks from his wording -- and obviously we can  
 10 ask him about this -- “panels are to be manufactured”,  
 11 as if a final decision had been made already to use  
 12 Reynobond ACM as the fabricated panels as opposed to  
 13 Alucobond or any other panels requiring fabrication.  
 14 Does that accord with your recollection, that a final  
 15 decision had been made?  
 16 A. No, no, at that stage it was as an alternative to the  
 17 Proteus anyway.  
 18 Q. Were you asked to obtain quotations for Alucobond?  
 19 A. I can’t recall, I’m afraid.  
 20 Q. What about VMZinc?  
 21 A. It’s possible. Again, I can’t recall.  
 22 Q. Right.  
 23 Given that you didn’t approach any fabricators other  
 24 than CEP, as you have told us, and given that you only  
 25 asked CEP or at least led CEP to understand that it was

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1 only to quote for Reynobond, does it follow that in fact  
 2 there were no quotations sought from fabricators for  
 3 Alucobond?  
 4 A. Again, I can’t recall.  
 5 Q. Would the same apply to the VMZinc as well?  
 6 A. That’s right, yes.  
 7 Q. From your own recollection, is it fair to say that  
 8 Harley was pushing the Reynobond product and was seeking  
 9 quotations based on its proposed use at Grenfell?  
 10 A. No, I don’t think that at all.  
 11 Q. Right.  
 12 Can I ask you to look at {CEP000000273}. Now, this  
 13 is an email from Mark Harris to Geof Blades of  
 14 29 January, copied to you. He says:  
 15 “Hi Geof  
 16 “Just to let you know, the main contractor tender  
 17 return date has been further extended by another week  
 18 14th Feb. So glad we pulled out all the stops to get a  
 19 price back!!”  
 20 Were you working against a tight timescale to  
 21 prepare the tender for submission?  
 22 A. Not particularly, it was just about usual for those sort  
 23 of projects.  
 24 Q. Right. Did you feel under pressure to get the  
 25 quotations out as soon as possible?

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1 A. No more than usual, really .  
 2 Q. No more than usual, but nonetheless some degree of  
 3 pressure?  
 4 A. Yeah, that's usual, yeah.  
 5 Q. Let's look at Harley's quotation itself , please,  
 6 a little more closely. At {HAR00010151/4} is your  
 7 statement at paragraph 13. You say here:  
 8 "A quotation was produced by myself and agreed with  
 9 Ray Bailey and Mark Harris. The quotation ... was sent  
 10 to all potential main contractors. Rydon were  
 11 ultimately awarded the contract, and I assisted  
 12 Mark Harris with providing additional costings and cost  
 13 analysis."  
 14 Do you see that?  
 15 A. Yes.  
 16 Q. You go on to say:  
 17 "By further cost analysis I mean breaking down the  
 18 costs given in the quotation in further detail so that  
 19 Rydon could see more detail of exactly what the costs  
 20 given in the quotation consisted of."  
 21 Can I ask you to turn back to Harley's quotation, or  
 22 turn to it . It's at {RYD00002606}. This is an email  
 23 from you to Katie Bachellier of 29 January, copied to  
 24 Simon Lawrence, so same day, and you attach the  
 25 quotation to that for Grenfell .

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1 Was this quotation in the same form as that which  
 2 you provided to the other main contractors bidding for  
 3 this project at that time?  
 4 A. Yes, exactly the same document.  
 5 Q. I see.  
 6 Do you know what process you had gone through to  
 7 reach the final figures in the tender?  
 8 A. In what way, sorry?  
 9 Q. Well, what process had you gone through in order to  
 10 reach the final figures in the quotation document?  
 11 A. I would have measured all the elements on the project,  
 12 obtained prices or used historic prices, compiled the  
 13 tender sum, and compiled the document as well, and  
 14 checked it with Ray and Mark Harris before it actually  
 15 went out.  
 16 Q. Right.  
 17 Let's look at the quotation itself . It's at  
 18 {RYD00002607}. There it is, we saw it earlier , and we  
 19 will come back to it in a bit more detail now.  
 20 If we go to page 2 {RYD00002607/2}, this is a letter  
 21 signed by you to Rydon, same day, 29 January 2014, and  
 22 it says there in the second paragraph, you see:  
 23 "Our offer includes for the design, supply and fix  
 24 of a complete envelope package, all in accordance with  
 25 the Clients Requirement Documents issued by yourselves."

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1 Now, we know that part of Harley's tender, as we can  
 2 see, was for the design of the façade; yes?  
 3 A. That's right , yes.  
 4 Q. If we go to page 9 in this document -- I think we've  
 5 already seen part of this , because I showed you this  
 6 earlier this morning, in the middle -- we can see that  
 7 the total figure for the project , or so far as Harley  
 8 was concerned as potential subcontractor, was  
 9 £3.2 million - odd; yes?  
 10 A. That's right , yes.  
 11 Q. And that was on the basis of zinc rainscreen cladding;  
 12 yes?  
 13 A. That's right , yes.  
 14 Q. Yes, and that was before any alternatives by way of  
 15 product or any value engineering was applied, wasn't it?  
 16 A. That's right , yes.  
 17 Q. Looking at the rates there, do you know where they came  
 18 from?  
 19 A. All the rates? They would have come from prices  
 20 obtained from material suppliers and built up internally  
 21 at Harley.  
 22 Q. I see. Do you know where the measurements had come  
 23 from?  
 24 A. From myself.  
 25 Q. I see. So you had done the measurements based on what,

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1 the drawings?  
 2 A. Based on the drawings, yes.  
 3 Q. I see. If we look at page 10 {RYD0002607/10}, the next  
 4 page, "Alternatives and options", at the top of the page  
 5 there, you can see that halfway down that page there is  
 6 "Rainscreen Cladding" as a section , and we can see that  
 7 there are various prices set out for "As quotation" and  
 8 then "Alternatives" .  
 9 Were the products that you set out there derived  
 10 from the NBS specification , do you think?  
 11 A. Yes, the Proteus and the CGL cladding was, and obviously  
 12 the Reynobond and Alucobond as well as the alternatives .  
 13 Q. We can see that you provided prices for both Reynobond  
 14 and Alucobond rainscreen cladding.  
 15 A. That's right , yeah.  
 16 Q. With different prices for face-fixed and cassette,  
 17 although they're identical : £240 per square metre for  
 18 cassette and £190 per square metre for face-fixed .  
 19 Where did you take those prices from?  
 20 A. From memory, probably the Reynobond would have been from  
 21 Geof Blades' costs .  
 22 Q. Right.  
 23 A. And Alucobond, because Alucobond and Reynobond are very  
 24 similar in cost, we would have put the same cost in  
 25 there at that stage, because there was no finishes

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1 specified at that point, so we just put the same cost  
 2 in.  
 3 Q. I see.  
 4 A. Just as a guide.  
 5 Q. So you didn't actually ask Alucobond to provide  
 6 a specific number?  
 7 A. No.  
 8 Q. I see. So the Alucobond prices there were  
 9 an assumption, were they?  
 10 A. That's it, based on historic costs at Harley.  
 11 Q. Right.  
 12 Do you know or did you know at the time who was  
 13 going to fabricate the Alucobond cassettes?  
 14 A. No.  
 15 Q. Now, we can see that there's no VMZinc product included  
 16 in these options, although it was listed, as we've seen,  
 17 as one of the alternatives in the NBS specification. Do  
 18 you know why that is?  
 19 A. I don't recall, I'm afraid.  
 20 Q. Do you recall any discussion with Mr Harris or  
 21 Mr Bailey, Ray Bailey, about excluding the VMZinc as  
 22 an alternative cost or price for the rainscreen?  
 23 A. I'm afraid I can't remember any discussion on that.  
 24 Q. Do you remember whether it was Harley's aim to make sure  
 25 that Reynobond ACM was chosen out of all the options

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1 provided in the NBS spec?  
 2 A. No, I don't recall any discussions on that.  
 3 Q. Right.  
 4 I mean, we've seen from your evidence this morning  
 5 and other evidence that the only fabricator approached  
 6 was CEP, the only quotation from them was for Reynobond  
 7 ACM, the only figures that are quoted for the  
 8 alternative are based on Reynobond as firm figures, you  
 9 hadn't approached Alucobond and hadn't got any prices  
 10 for Alucobond. In the light of that, would you accept  
 11 that it is fair to say that the use of Reynobond panels  
 12 was a foregone conclusion?  
 13 A. No, because at that stage they were just an alternative  
 14 to the Proteus zinc, so it wasn't a -- they were just  
 15 there as an alternative system.  
 16 MR MILLETT: Mr Chairman, is it a convenient moment for  
 17 a break?  
 18 SIR MARTIN MOORE-BICK: Yes, I think it is, Mr Millett.  
 19 Thank you very much.  
 20 Mr Albiston, we're going to have a break now.  
 21 THE WITNESS: Okay.  
 22 SIR MARTIN MOORE-BICK: We will come back at 11.40, please.  
 23 While you're out of the room, please don't talk to  
 24 anyone about your evidence or anything related to it.  
 25 THE WITNESS: Okay.

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1 SIR MARTIN MOORE-BICK: If you would like to go with the  
 2 usher, she will look after you.  
 3 (Pause)  
 4 Right, 11.40, then, thank you.  
 5 (11.26 am)  
 6 (A short break)  
 7 (11.40 am)  
 8 SIR MARTIN MOORE-BICK: All right. Ready to carry on?  
 9 THE WITNESS: Thank you, yes.  
 10 SIR MARTIN MOORE-BICK: Very good, thank you.  
 11 Yes, Mr Millett.  
 12 MR MILLETT: Mr Albiston, can I ask you to turn to your  
 13 statement, please, at paragraph 35 {HAR00010151/8}.  
 14 Before I do that, before that comes up on the  
 15 screen, I have been asked to just revisit something  
 16 I put to you earlier, which was the 18 October budget  
 17 and the authorship of that document.  
 18 A. That's right, yes.  
 19 Q. 18 October 2013.  
 20 Now, I just want to put accurately to you what  
 21 Mr Harris said about that on {Day34/65:23}, and his  
 22 evidence to the Inquiry was that:  
 23 "Answer: It was more likely to have been the  
 24 estimator, I believe.  
 25 "Question: What, Mike Albiston?

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1 "Answer: Yes, that's correct."  
 2 Then he goes on to say at {Day34/66:5):  
 3 "Answer: It's more likely to have been him, so  
 4 I couldn't absolutely categorically say it wasn't me,  
 5 but looking at that document, that's more likely to have  
 6 been him.  
 7 "Question: Okay.  
 8 "Did you have any discussions with Mike Albiston or  
 9 any input into its creation?  
 10 "Answer: I'm sure there were discussions, yeah."  
 11 Just looking at his evidence, is what he says there  
 12 correct, or is your recollection different?  
 13 A. No, it's different, and I believe probably it's just the  
 14 passage of time, that he probably just doesn't remember  
 15 when I actually started at the company. As I say, it  
 16 was the beginning of October, so at that point I was  
 17 working on other projects, I wasn't involved in those  
 18 budgets. So it's really just memory from that time.  
 19 But obviously further on, probably a year on, I would  
 20 have been involved in those sort of -- those documents.  
 21 Q. I see.  
 22 Can we go to your witness statement on page 8  
 23 {HAR00010151/8}, paragraph 35, that I've just referred  
 24 you to. You say here:  
 25 "Any changes to materials had to be agreed by the

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1 architect . Although some changes in materials were  
 2 proposed or suggested by Harley, these were nevertheless  
 3 ultimately subject to approval by the architects .”  
 4 Who were the architects that you’re referring to  
 5 here?  
 6 A. Studio E.  
 7 Q. Once Rydon was appointed the main contractor, did you  
 8 anticipate a discussion about materials between Harley  
 9 and Studio E in the event of any change which would lead  
 10 to the ultimate approval by Studio E?  
 11 A. I believe they would have been discussed at that point,  
 12 yes.  
 13 Q. How did you come to that understanding?  
 14 A. Because it’s usual on these sort of projects where there  
 15 are changes that it has to go through the architect .  
 16 Q. You say usual on these sorts of projects; did you have  
 17 any specific conversation with anybody within Harley  
 18 about what you should do where there was to be a change?  
 19 A. Sorry, in what way?  
 20 Q. Well, did anybody tell you -- anybody at Harley, that  
 21 is -- that where there was to be a change in materials,  
 22 you should have or there should be a discussion with  
 23 Studio E or with Rydon?  
 24 A. No, it was just industry practice , really , that any  
 25 changes would be agreed by the architects .

1 Q. Did you in fact in the end ever have a discussion with  
 2 Studio E whereby they approved a change in material?  
 3 A. No, because after the contract was won by Rydons and  
 4 they appointed Harley, I didn’t actually have any  
 5 discussions with Studio E or Rydons on product changes.  
 6 Q. I see.  
 7 Do you know whether anybody else at Harley had  
 8 discussions with Studio E whereby they approved a change  
 9 in materials?  
 10 A. I don’t know if they did or not.  
 11 Q. I see.  
 12 Can we look at {RYD00003315}, please. This is  
 13 an email from Mark Harris to Steve Blake of  
 14 14 March 2014, which attached proposed value engineering  
 15 options, and you can see that it was copied to you as  
 16 well as to Simon Lawrence and Katie Bachellier.  
 17 Let’s look at it . It says:  
 18 “Please find the first round of V/E options attached  
 19 for Grenfell Tower.  
 20 “This has been presented to show the value of the  
 21 compliant package, with V/E cost options below. The  
 22 cladding is shown with 4 options for the main zinc  
 23 areas. At the risk of stating the obvious, the cladding  
 24 savings are not cumulative, only one of the four options  
 25 can be selected .”

1 Looking at the date, Mr Albiston, this was after  
 2 Harley’s quotation had been submitted, wasn’t it?  
 3 A. That’s right, yes.  
 4 Q. Some time after, actually , about six weeks or so.  
 5 A. Yes.  
 6 Q. Yes.  
 7 Were you involved in producing the value engineering  
 8 options that Mr Harris was referring to?  
 9 A. I was, yes.  
 10 Q. Do you know who asked you to do that?  
 11 A. Within Harley or externally?  
 12 Q. Well, let’s start with Harley.  
 13 A. It would have been Mark Harris.  
 14 Q. Right. Did anybody externally ask you to do it?  
 15 A. Not directly , it would have been through Mark. It would  
 16 have been Rydons who would have asked that.  
 17 Q. I follow.  
 18 Now, we’ll go to the attachment in just a moment.  
 19 Before we do, sticking with the email, in the fourth  
 20 paragraph down, Mark Harris says:  
 21 “We have included options for both face fixed (as  
 22 used at Camden) and secret fixed (cassette), but again  
 23 would comment that the architect was none too keen on  
 24 face fixed when discussed. I would be surprised if they  
 25 would accept Reynobond with a standard paint finish ,

1 however, we have included it as one of the options on  
 2 the basis that a significant cost saving can be made.  
 3 Although the attached states standard silver finish , any  
 4 of the standard ACM colours would be available at the  
 5 same rate.  
 6 “Hope this is sufficient for your meeting on  
 7 Monday?”  
 8 Did you yourself explore any value engineering  
 9 options in respect of a zinc product, Mr Albiston?  
 10 A. I don’t believe I did, no.  
 11 Q. Why is that?  
 12 A. I wasn’t asked to.  
 13 Q. Right. Did it occur to you to take that up with  
 14 Mark Harris and say, “Well, we should be looking at  
 15 alternative costings for zinc”?  
 16 A. No, because that wasn’t -- wasn’t my position to  
 17 actually make those suggestions.  
 18 Q. Right.  
 19 Did you yourself think about going back to KME and  
 20 asking for a price reduction?  
 21 A. No, I didn’t.  
 22 Q. I take it from that answer that there was no discussion  
 23 between you and Mark Harris or anybody else at Harley  
 24 about going back to KME and asking for --  
 25 A. Again, I can’t recall it . Again, we may have actually

1 contacted KME about a price reduction, but I can't  
 2 recall a conversation.  
 3 Q. At the time that ACM was raised as an alternative option  
 4 to zinc, what assessment had you or, to your knowledge,  
 5 anybody else at Harley done to determine that ACM  
 6 complied with ADB, Approved Document B, as the choice of  
 7 material to provide the surface of the external wall on  
 8 the building?  
 9 A. Sorry, could you repeat the question? Sorry.  
 10 Q. Yes. When ACM was raised as alternative to zinc, did  
 11 you do any assessment or did anybody at Harley do any  
 12 assessment for compliance with Approved Document B?  
 13 A. Right, I didn't do any assessments. It's possible that  
 14 someone else in a technical position would have done  
 15 that.  
 16 Q. Right.  
 17 Can we then look at the attached document, which is  
 18 at {RYD00003316}, please.  
 19 Do you know who created this document?  
 20 A. That was myself.  
 21 Q. That was you.  
 22 Now, all the proposed cladding savings which are set  
 23 out here refer only to Reynobond products. There is no  
 24 Alucobond and no VMZinc, for example. Why was that?  
 25 A. Again, I would have been told to do that by either

1 Ray Bailey or Mark Harris. That was the product we were  
 2 just using on those alternatives .  
 3 Q. When you say "told to do that", do you mean told only to  
 4 look for reductions on Reynobond products?  
 5 A. I think because at that point there was discussions with  
 6 Reynobond over the particular finishes , like the zinc  
 7 type of finish , so that was the route we was going down  
 8 at that point.  
 9 Q. Right. Does that explain why you didn't go back to  
 10 Alucobond to say, "Can we actually have a good price",  
 11 or a price that was better than what Reynobond were  
 12 offering you at the time?  
 13 A. That's right, yes.  
 14 Q. Do you remember where you got these revised prices from?  
 15 A. Probably -- it would have been -- with Reynobond, it  
 16 would have been from CEP.  
 17 Q. You say probably; do you remember that?  
 18 A. Not exactly, but that would have been the basis of those  
 19 costs .  
 20 Q. I see. So these costs would have included fabrication?  
 21 A. That's right, yes.  
 22 Q. Yes.  
 23 Now, if you go to your statement, please, you see  
 24 that you say there at paragraph 31 {HAR00010151/8}:  
 25 "I have been an estimator for over twenty years ..."

1 We saw this earlier and we also saw this reference  
 2 to Booth Muirie.  
 3 Is it fair to say that you were familiar with  
 4 Alucobond and had used it successfully with other  
 5 companies on other buildings?  
 6 A. Yes, I had, yes.  
 7 Q. Did you raise any concerns with Mark Harris about not  
 8 using Alucobond or not seeking quotations for Alucobond  
 9 as an alternative ?  
 10 A. No.  
 11 Q. Why is that?  
 12 A. I didn't think it was an issue .  
 13 Q. Did you have a feel for whether, when looking at value  
 14 engineering, Alucobond might provide even more  
 15 favourable reductions than Reynobond?  
 16 A. It's possible, but from experience, Alucobond and  
 17 Reynobond were very similar cost, so there was not much  
 18 to choose between them, really .  
 19 Q. Now, you said a moment ago that you might have got these  
 20 revised prices from CEP. Do you remember having  
 21 a discussion with Mr Blades or anybody else at CEP about  
 22 these revised prices?  
 23 A. No, because the -- I think the value engineering options  
 24 were based on actual measures of all the cladding areas,  
 25 so it would have been based on his original quotation

1 that he provided.  
 2 Q. Right.  
 3 Do you know what accounts for the reduction in each  
 4 case? If it helps, we can look back at the document.  
 5 Perhaps we should do that.  
 6 If you look at {RYD00003316}, we'll just focus on,  
 7 for example, the £576,000-odd reduction in relation to  
 8 Reynobond aluminium face-fixed. Do you know how it was  
 9 that that figure was arrived at?  
 10 A. Yes, it would have been comparing the cost for the  
 11 Proteus zinc cladding against the Reynobond and the  
 12 difference in those.  
 13 Q. Yes, and given that this is value engineering, can you  
 14 account for the increase in saving or difference between  
 15 the two?  
 16 A. Sorry, the saving between which, sorry?  
 17 Q. Between the zinc, the Proteus zinc, as you said a moment  
 18 ago, which was the comparator, and the --  
 19 A. Right. Well, the Proteus was a more expensive product  
 20 than the Reynobond, so that's the difference in cost.  
 21 Q. Yes, I'm sorry, maybe we're at cross-purposes. I'm  
 22 asking you how these precise figures were arrived at.  
 23 Do you know?  
 24 A. As I said before, it was based on a cost for the Proteus  
 25 as we used in the compliant bid, and then re-worked

1 using the Reynobond prices, and that would have been the  
 2 saving. Because Reynobond was a more -- you know,  
 3 a less expensive product than Proteus, there was  
 4 a difference in cost.  
 5 Q. Were these prices that you were offering not reductions  
 6 on the prices that were contained in the Harley quote of  
 7 29 January?  
 8 A. No, because the compliant bid of the 3 million is as the  
 9 quotation.  
 10 Q. Yes.  
 11 A. The savings are sort of more accurate figures, because  
 12 in the quotation it was just square metre rates, which  
 13 didn't really mean a lot in the scheme of the job, so  
 14 these are more based on actual areas. So these figures  
 15 weren't actually given before as VE options.  
 16 Q. I see. Right. Well, let's just look at that.  
 17 We can't find any trace of any document in which you  
 18 went back to CEP and asked them about revised prices  
 19 before quoting these to Rydon. Is that because you  
 20 didn't need to go back to CEP?  
 21 A. That's right, yeah.  
 22 Q. They were simple comparators --  
 23 A. That's right, yes.  
 24 Q. -- between what had previously been quoted and the zinc?  
 25 A. Yes.

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1 Q. Yes, I follow.  
 2 Can we go to {RYD00004916}, please. This is  
 3 an email from Simon Lawrence of 22 May 2014 to  
 4 Claire Williams at the TMO, and he says in the first  
 5 paragraph:  
 6 "Goods news hot of the press, is that what we  
 7 believed to be a more expensive ACM cladding finish  
 8 (Natural Aluminium) isn't going to be. The  
 9 manufacturers have confirmed that they are willing to  
 10 supply it at the same price as the other ranges  
 11 previously discussed. Therefore the savings stay the  
 12 same as per attached. £293,368 (cassette) or £376,175  
 13 (face fixed)."  
 14 Were you aware that Rydon had not passed on to the  
 15 TMO, their client, the full savings from using ACM that  
 16 you were offering?  
 17 A. No, I wasn't aware.  
 18 Q. Can we look at {HAR00000931}, please. This is an email  
 19 copied to you, 22 April 2014, from Mark Harris to  
 20 Simon Lawrence:  
 21 "Simon  
 22 "By far the easiest way for us to respond, is for me  
 23 to forward a copy of Bruce's email to Deb French at  
 24 Alcoa (the Reynobond lady) for comment regarding cost.  
 25 I'll do that straight away."

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1 In the third paragraph, he says:  
 2 "I would prefer to try and stick with Reynobond if  
 3 poss, nothing wrong with Alucobond of course, but I'm  
 4 not sure we can manage the cost so well if we go that  
 5 route!!"  
 6 Do you know why Mr Harris wanted to stick with  
 7 Reynobond?  
 8 A. No, I don't.  
 9 Q. Can you comment on his professed reason there, which is  
 10 managing the cost?  
 11 A. No, I don't --  
 12 Q. Did you share his concerns that you saw in this email  
 13 regarding Harley's ability to manage the costs if the  
 14 clients selected the Alucobond product?  
 15 A. I can't recall any sort of -- anything on that.  
 16 Obviously I saw the email as it was copied to me, but  
 17 I don't recall anything crossing my mind when I saw  
 18 that.  
 19 Q. Can we turn to {CEP00051297}. This is an email from  
 20 Mark Harris to Geof Blades just two days later,  
 21 24 April 2014, copied to you and Ray Bailey:  
 22 "Morning Geof  
 23 "Just to place a note on record regarding the  
 24 conversations between Debbie French and myself with  
 25 respect to Grenfell Tower."

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1 Then he goes on to say:  
 2 "The rates from Alcoa specific to the Grenfell  
 3 project for Brushed Look and Effects colours as stated  
 4 below (the colours shown as offering maximum saving  
 5 against the original natural zinc) will all be supplied  
 6 at the same rate as Alcoa's 'standard' colour range. As  
 7 stated, this is a special for Grenfell Tower."  
 8 Is it fair to say that the value engineering  
 9 exercise that you were involved in, as we've seen from  
 10 the VE options spreadsheet of 14 March, focused on  
 11 obtaining an appropriate Reynobond product from  
 12 Deborah French at Alcoa?  
 13 A. That's right, yes.  
 14 Q. To the best of your recollection, did Harley and you  
 15 particularly only consider the Reynobond product for  
 16 value engineering options?  
 17 A. I think at that point, because of discussions with  
 18 Reynobond regarding finishes, it was very much going  
 19 down the Reynobond route at that point, so I think it  
 20 was sort of focused on that, because if you start going  
 21 down the Alucobond route, there's other finishes and it  
 22 just puts a whole load more different, you know,  
 23 finishes into the mix, really.  
 24 Q. So when you say "very much going down the Reynobond  
 25 route", does that really tell us that, by this stage,

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1 although perhaps no formal decision had been made, so  
 2 far as Harley was concerned, it was going to be  
 3 Reynobond?  
 4 A. It probably was, yes.  
 5 Q. Yes.  
 6 Could I ask you to look at {HAR00005692}. This is  
 7 an email two days earlier, actually, of 22 April 2014  
 8 from Mark Harris to Deborah French, and he makes the  
 9 same point in the third paragraph. He says:  
 10 "I need some guidance regarding prices.  
 11 "We are trying to stick with what I would call  
 12 standard Reynobond rates, and I believe we spoke about  
 13 certain colours ..."  
 14 Then if you look at the bottom of that, he says:  
 15 "If you could respond in terms of which fall within  
 16 the standard price range, and which fall outside (rather  
 17 than quoting actual cost figures), I can then forward it  
 18 straight on to all concerned."  
 19 Again, you were copied in on this email.  
 20 Did you understand that, had the email contained the  
 21 actual prices, Mr Harris would not have wanted to  
 22 forward that straight on?  
 23 A. That's right, yes.  
 24 Q. And that's because Harley wouldn't want the architect to  
 25 know the actual prices?

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1 A. That's right. That's usual anyway.  
 2 Q. Right. Is that because the cost saving or uplift  
 3 inherent in your prices was something that you didn't  
 4 want the architect to know?  
 5 A. It's really just obviously the build-up of cost.  
 6 Because the architect can't just buy the product from  
 7 a supplier, he has to obviously come through  
 8 a fabricator and an installer, but obviously we've got  
 9 our add-on costs on that as well.  
 10 Q. Yes.  
 11 Now, can I ask you about the KME Proteus product.  
 12 If we can go to {RYD00004085}, please, this is an email  
 13 from you to Simon Lawrence of 30 April 2014. Do you see  
 14 that?  
 15 A. Yes, I do, yes.  
 16 Q. It's from you to Simon Lawrence, 30 April 2014, and you  
 17 attach the Proteus HR brochure, among other documents,  
 18 the NedZink as well, and you say:  
 19 "Hi Simon  
 20 "Please find attached the following information from  
 21 KME for the Proteus Rainscreen cladding."  
 22 You attach a typical draft guarantee, the new sales  
 23 brochure and a CWCT test document, which in fact I think  
 24 was on weathertightness, wasn't it?  
 25 A. It probably was, yes.

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1 Q. We can see from your description of it.  
 2 A. Right.  
 3 Q. We can look at the document if you like, but it's about  
 4 wind speed and serviceability and fatigue assessments,  
 5 which demonstrates a 50-year lifespan.  
 6 Do you know what had prompted you to send this  
 7 information and material to Mr Lawrence?  
 8 A. It would have been a request from Rydons, particularly  
 9 Simon Lawrence.  
 10 Q. I see.  
 11 Was the Proteus product, the zinc HR Proteus  
 12 product, still being considered at this stage,  
 13 30 April 2014?  
 14 A. I believe it must have been, yes, because it would have  
 15 been -- as you see in the documents, it would have been.  
 16 Q. When you saw this email, were you surprised that the  
 17 Proteus HR rainscreen panel product was still  
 18 a candidate after all the value engineering you had done  
 19 on Reynobond ACM?  
 20 A. No, because that was still the architect's preferred  
 21 cladding system at that point. It was still the one in  
 22 the NBS.  
 23 Q. I would like to look next at the costing error that  
 24 there was in the ACM and its impact on the choice of  
 25 face-fixed or cassette, if any.

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1 It's right, I think, that you made a cost error in  
 2 Harley's quotation for Grenfell Tower, didn't you?  
 3 A. That's right, yes.  
 4 Q. Let's look at {RYD00009596}, please. This is an email  
 5 chain between you and Zak Maynard at Rydon. At the very  
 6 bottom of page 1, we can see your email to Zak Maynard  
 7 of 23 June 2014, and you say:  
 8 "Hi Zak  
 9 "I've been through my cost error on Grenfell Tower  
 10 and enclose the following to explain what happened."  
 11 Then there are some details set out there which  
 12 I don't need to go to quite yet.  
 13 You say "my cost error"; is it fair to say that it  
 14 was you who made the mistake when initially costing the  
 15 project?  
 16 A. That's right, yes.  
 17 Q. Okay. Then you go on to explain, if we look at the  
 18 bottom of page 1 and over to page 2 {RYD00009596/2}, how  
 19 the cost saving error came about. If you look at  
 20 page 2, I think, most of the detail is there.  
 21 I don't want to spend time reading it all out to  
 22 you, but in essence, your original cost had omitted  
 23 items for face-fix, including flashings, smoke stops and  
 24 supports for the crown, whereas the zinc cost did  
 25 include those. That's right, isn't it?

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1 A. That's right, yes.  
 2 Q. And the same in relation to the cassette, but the  
 3 difference was a bit less.  
 4 A. That's right, yes.  
 5 Q. Is it right, then, that in summary, because of your  
 6 error, the saving that Harley were able to offer Rydon  
 7 for face-fixed Reynobond PE panels was only £376,000-odd  
 8 as opposed to £576,000-odd?  
 9 A. Yeah, that's -- if that's the figures, yeah, I can't --  
 10 Q. Yes, and in respect of cassette-fixed panels, the new  
 11 reduced savings would be 259,000 instead of 419,000.  
 12 A. Yes.  
 13 Q. Let's go on a bit in time, {RYD00009823}, please. This  
 14 is an email of 25 June 2014 from you to Mr Maynard,  
 15 copied to Mark Harris, "Grenfell Tower - price build  
 16 up", and you attach the cost saving error breakdown.  
 17 You say in the second paragraph:  
 18 "As you see, the shortfall of both face fix and  
 19 cassette is £200,380. But as explained in my previous  
 20 email, the cost used for cassette was more accurate than  
 21 the face fix which was a bit low. This would result an  
 22 additional shortfall to Harley of around £37,850 if face  
 23 fix was selected."  
 24 Is it fair to say that the cost error was minimised  
 25 by about £40,000 if the cassette fixing was chosen?

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1 A. I believe that's the case, yes.  
 2 Q. So about £160,000 instead of about £200,000?  
 3 A. Yes.  
 4 Q. So would it follow from that that, as far as you were  
 5 concerned, from Harley's financial perspective,  
 6 a cassette fix was the better option?  
 7 A. It would have been, yes.  
 8 Q. Yes.  
 9 Can we look, then, at the attachment to this email,  
 10 the cost saving error breakdown. It's at {HAR00014785}.  
 11 Here it is, 25 June 2014.  
 12 Did you create this document?  
 13 A. Yes, I did.  
 14 Q. We can see in the first box at the top of the page that  
 15 you set out the original savings for ACM face-fixed as  
 16 originally calculated and given to Rydon.  
 17 A. Yes.  
 18 Q. And compared with zinc. So you can see the saving for  
 19 ACM, there is the 576 figure, and in the second box  
 20 I think you set out the actual savings.  
 21 A. Yes.  
 22 Q. So we're comparing the saving given with the actual; is  
 23 that right?  
 24 A. That's right, yes.  
 25 Q. I've got that right. So we can see from that that you

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1 had omitted the additional supports at the head of  
 2 columns, flashings and copings, and vertical and  
 3 horizontal smoke stops.  
 4 For someone with your experience in pricing and  
 5 estimating, would you agree that this was quite a basic  
 6 error?  
 7 A. Yes, I would, and at the time I was horrified by it.  
 8 Q. Can you explain how you came to make it?  
 9 A. I can't, because if I knew how I made it, I wouldn't  
 10 have made it in the first place. But unfortunately it  
 11 was just a case of omitting too many items and not  
 12 adding back the items that needed to be added back in.  
 13 Q. Right. You can't explain how you came to make that  
 14 basic error?  
 15 A. Well, as I said, I added back items that shouldn't have  
 16 been added back in or vice versa.  
 17 Q. Can we look at {HAR00005775}, please. This is an email  
 18 from Mark Harris to Ray Bailey, copied to you,  
 19 23 May 2014. If we scroll down to the second email  
 20 down, you can see there is an email from Bruce Sounes of  
 21 23 May also, the same day, earlier in the day, 2014, to  
 22 Claire Williams and Simon Lawrence, copied to  
 23 Mark Harris. So we can see Mark Harris essentially  
 24 copying that on to you and then making a comment.  
 25 So scrolling down, we can see what Mr Sounes says,

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1 and he says, under the blue heading "Picasa web album",  
 2 which is actually a reference, he says:  
 3 "The brushed aluminium (Natural Aluminium Brushed  
 4 H 9103 S) looks very good. The appeal relies also on  
 5 the deep shadow joints, and I think the vertical joints  
 6 channel rainwater run-off thereby keeping the faces  
 7 cleaner. The natural aluminium seems to have [picked]  
 8 up less dirt than the painted panels. It is very  
 9 reflective but I don't think it will get glare  
 10 complaints."  
 11 Then he goes on to say:  
 12 "If we send the Planners to see the example they  
 13 will jump on the fact it is clean of all face fixings,  
 14 with rivets mostly concealed in return faces to the  
 15 joints. I know you have prepared cost options to do  
 16 this but I've prepared a sketch, attached showing how  
 17 the ACM could be assembled as cassettes or perhaps as a  
 18 hybrid which I'm less convinced by.  
 19 "I think the brushed aluminium cassette will be  
 20 accepted by Planners."  
 21 Now, scrolling up, we can see that Mr Harris sends  
 22 this to Claire Williams and Simon Lawrence but copies in  
 23 Mark Harris and you. Do you see that?  
 24 A. I do, yes.  
 25 Q. Mark Harris sends it to Ray Bailey and you get this.

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1 The comment is:  
 2 "Interesting comments from the architect. This  
 3 might help with our current predicament! I've not  
 4 spoken with Simon about cost issues as yet, and I think  
 5 I will keep quiet and see how this plays itself out."  
 6 By "our current predicament", did you understand  
 7 when you saw this email, as you did, that Mr Harris was  
 8 referring to your cost estimating error?  
 9 A. That's right, yes.  
 10 Q. Is it fair to say that the cost error therefore came to  
 11 light within Harley in around May 2014?  
 12 A. That's right, yes.  
 13 Q. Do you remember how or when you first discovered it?  
 14 A. I can't remember actually when, but it was myself who  
 15 discovered it. I was just looking at costs again just  
 16 for my own purposes and I discovered the error.  
 17 Q. Right.  
 18 Were you hoping, or was Harley hoping, that the  
 19 error would be minimised by a cassette choice without  
 20 having to discuss it with Rydon?  
 21 A. It possibly was the opinion of Harley, but again,  
 22 I wasn't really involved in discussions on that.  
 23 Q. Again, that's because, for Harley, the optimum cost  
 24 savings would be from choosing cassette and not  
 25 face-fixed, as I think --

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1 A. That's right, yes.  
 2 Q. Is that why Mark Harris wanted to see how it played out,  
 3 to your understanding?  
 4 A. I think it was, yes, yes.  
 5 Q. Can we go to {HAR00000944}, please. This is an email of  
 6 25 April from Mark Harris to you under which he forwards  
 7 to you an email the same day, a little earlier that day,  
 8 from Simon Lawrence to him, Mark Harris, and  
 9 Kai Fabiunke at Studio E, copied to Bruce Sounes,  
 10 "Afternoon Kai", that should say, and he says in the  
 11 second main paragraph:  
 12 "in order to design a system that achieves the  
 13 Client's requested budget ..."  
 14 Do you see that?  
 15 A. Yes.  
 16 Q. "... we need to be making everything face fix and from  
 17 flat sheet where possible."  
 18 Just on that, is it right that by this stage,  
 19 therefore, 25 April 2014, you knew that Rydon wanted  
 20 face-fixed for the client's budget?  
 21 A. It's possible, again, reading that I -- I can't actually  
 22 remember reading that, that email, but that would have  
 23 been the case.  
 24 Q. Right. Okay. But once you had discovered your costing  
 25 error, as you did in about May, as I think you told us,

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1 there was then -- is this right? -- a desire within  
 2 Harley to have cassette in its own financial interests?  
 3 A. Possibly, yes.  
 4 Q. Yes.  
 5 Now, if we look at {RYD00005425}, this is an email  
 6 from Mark Harris to Simon Lawrence, 30 May 2014, copied  
 7 to you as well as Ray Bailey and Daniel Anketell-Jones,  
 8 and the subject is "Grenfell - Rivet matched to natural  
 9 brushed ali Reynobond", and in the second paragraph, he  
 10 says:  
 11 "That said, as discussed on site, our preference  
 12 would be for cassette for lots of reasons!!"  
 13 Do you know what the lots of reasons were that he  
 14 was referring to?  
 15 A. It possibly would have been because of the cost  
 16 difference.  
 17 Q. Yes. Were there any others?  
 18 A. Not that I'm aware of.  
 19 Q. Do you remember whether any consideration was given,  
 20 either by you or anybody else in Harley that you knew  
 21 of, as to how the different fixings might impact or  
 22 affect fire safety or fire performance?  
 23 A. No.  
 24 Q. Were you aware, at this time or indeed at any other time  
 25 when working on this project, that Reynobond PE 55 in

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1 a cassette format was significantly more combustible  
 2 compared with a riveted format?  
 3 A. No, I didn't know.  
 4 Q. Do you know whether anyone at Harley had ever had  
 5 a discussion about the relative fire performance of each  
 6 of these --  
 7 A. I don't know.  
 8 Q. -- different fixing systems?  
 9 A. I don't know.  
 10 Q. Did you yourself make any investigations into how the  
 11 fixing method would affect fire performance?  
 12 A. No, because I didn't have any concerns about it.  
 13 Q. Can we then turn to the subject of insulation and go  
 14 back briefly to the NBS specification. This is the  
 15 final version of January 2014 that I want to look at, so  
 16 not the version we were looking at before, but it  
 17 doesn't make any difference for this purpose.  
 18 {SEA00000169/73}, please. This is page 73, clause 776,  
 19 and we can see here, under "Thermal insulation", that  
 20 what's specified was:  
 21 "Material: ... rigid [PIR] ...  
 22 "Manufacturer: Celotex ...  
 23 "Product reference: FR5000 aluminium foil faced both  
 24 sides."  
 25 Is it right to say that the installation of the

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1 insulation was part of Harley's scope of works?  
 2 A. That's right, yes.  
 3 Q. And would it follow from that that you were required to  
 4 provide a quotation which included a price for the  
 5 purchase and installation of the insulation product?  
 6 A. That's right, yes.  
 7 Q. Now, we don't see any alternatives set out in the  
 8 NBS specification for thermal insulation; that's right,  
 9 isn't it?  
 10 A. That's right, yes.  
 11 Q. I would ask you to accept that.  
 12 Can we then turn to the quotation that you prepared  
 13 in January 2014 at {RYD00002607}, please. There it is,  
 14 it's a lengthy document, but if we go to page 9  
 15 {RYD00002607/9} again, which we looked at before, which  
 16 is the cost build-up and the total, we don't see any  
 17 reference in there to the product specified for  
 18 insulation, or indeed anywhere in this document.  
 19 A. No, that's in the descriptions for the rainscreen  
 20 cladding in the document. So further back in the  
 21 document the insulation is referred to.  
 22 Q. Yes, and we can see that if we go back a little bit, but  
 23 my question is: there is no reference to any particular  
 24 product.  
 25 A. No, no.

1 Q. No. If we look at, indeed, page 8 {RYD0002607/8}, the  
 2 page before, and look under excluded items, we looked at  
 3 that before, or rather we looked at that elsewhere in  
 4 a different document, but here we see, "Items excluded  
 5 from our quotation". We can see that insulation -- it's  
 6 a slight negative here -- isn't included from the items  
 7 excluded, if you see what I mean.  
 8 Does that tell us that it must have been positively  
 9 part of your package?  
 10 A. That's right, yes.  
 11 Q. What was the product that was going to be used as  
 12 contemplated by this quotation?  
 13 A. It was going to be either Celotex or a similar  
 14 insulation product.  
 15 Q. I see. Did you yourself consider whether the Celotex  
 16 specified, the FR5000, was a suitable product for use at  
 17 Grenfell Tower?  
 18 A. No, because that wasn't my role at the company to check  
 19 those things.  
 20 Q. Right. Did you have any conversations with anyone at  
 21 Harley about whether FR5000 was suitable for Grenfell?  
 22 A. As I said before, the NBS document would have been  
 23 looked at by Daniel or Ray Bailey.  
 24 Q. I think you told us earlier that you didn't go to  
 25 suppliers and get specific quotations or figures from

1 specific manufacturers, particularly Celotex.  
 2 A. No, I didn't.  
 3 Q. Right. Is there a reason why you didn't go to Celotex  
 4 and ask for a price for FR5000?  
 5 A. Because we had historic prices for insulation used on  
 6 previous projects, it was like an item that you can be  
 7 fairly confident in the cost base for, so you can use  
 8 those on most projects.  
 9 Q. Would it not have been sensible, rather than just being  
 10 fairly confident in the cost base, just to send them  
 11 an email and ask them for a price?  
 12 A. It's not usual, really, it's just usual practice,  
 13 you know, if we know prices. Unless you have got  
 14 particular items like the rainscreen cladding or the  
 15 windows, curtain walling, which are the larger items on  
 16 a project, they're obviously more cost based, but  
 17 insulation is very much a square metre rate used on  
 18 a building, so we're fairly confident in those prices.  
 19 Q. Right.  
 20 Given that you had not, or so far as you remember,  
 21 you couldn't remember whether you had worked on  
 22 a project where Celotex was used or not, would it not  
 23 have been sensible to ask Celotex for a specific price  
 24 rather than --  
 25 A. No, because as I said before, Harley had used that

1 product before, so I was reliant on their cost, the cost  
 2 information I was given.  
 3 Q. Right. You say Harley had used that product before; do  
 4 you know on what projects Harley had used FR5000 before?  
 5 A. I don't know, I'm afraid.  
 6 Q. How had you come to understand that Harley had used  
 7 FR5000 on previous projects?  
 8 A. I can't recall exactly, but again, it would have just  
 9 been through discussions with, you know, Ray or Mark.  
 10 Q. Do you remember specifically, or if not specifically  
 11 generally, actually being told that FR5000 had been used  
 12 by Harley on previous projects?  
 13 A. I can't recall that, I'm afraid.  
 14 Q. But you say that's the impression you were given from  
 15 discussions by --  
 16 A. That's right. It wasn't a case of when the NBS document  
 17 we looked at, it was, "This is unusual, this is  
 18 something we haven't used before", so, you know, it was  
 19 just something that we were happy to use.  
 20 Q. Do you know whether anyone at Harley ever made any  
 21 specific enquiries about whether FR5000 would be  
 22 suitable to use at Grenfell?  
 23 A. I don't know.  
 24 Q. Now, we know that the RS5000 Celotex product was  
 25 launched on 5 August 2014. Were you aware of that



1 launch of that product --  
 2 A. No.  
 3 Q. -- at that time?  
 4 Were you aware that it was then specified for use on  
 5 the Grenfell Tower project shortly after that launch?  
 6 A. I wasn't aware of that, no.  
 7 Q. Were you aware that there had been a change of material  
 8 from the FR5000 as specified in the NBS specification to  
 9 RS5000 in around August 2014?  
 10 A. No.  
 11 Q. Do you know whether that change was the subject of  
 12 discussion within Harley?  
 13 A. No. Sorry, what time of the year was that?  
 14 Q. August 2014.  
 15 A. August. So I think by that point I was actually not on  
 16 the project anymore anyway, so ...  
 17 Q. Right, okay.  
 18 Well, let's look at a document. Can you go to  
 19 {CEL00009973}, please. This is a document created by  
 20 Celotex called a Salesforce entry in a database.  
 21 Are you familiar with this document or with this  
 22 kind of document?  
 23 A. No, I've never seen this before.  
 24 Q. There is no reason why you should be --  
 25 A. No.

1 Q. -- given that it's an internal Celotex document, but  
 2 let's look at page 2 {CEL00009973/2} of it.  
 3 Now, this is a list of meetings and communications  
 4 between Celotex's sales force or others at Celotex and  
 5 those at Harley. If you look at the entry for  
 6 24 November 2014, just below halfway down, you will see  
 7 that there are a number of items for that date. The  
 8 date is on the right-hand column. You can see that the  
 9 second item down against the date of 24 November is  
 10 a meeting with you on the subject of Premier House.  
 11 A. Yes.  
 12 Q. Do you remember that meeting?  
 13 A. No.  
 14 Q. You don't.  
 15 A. No.  
 16 Q. Can we go to {CEL00000452}, then, please. These are  
 17 meeting notes taken by Jonathan Roome of Celotex after  
 18 a meeting that he had had at Harley's offices on  
 19 24 November, and if you quickly flip to page 2  
 20 {CEL00000452/2}, you can see that Mr Roome has put  
 21 an email signature on that document.  
 22 Now, if we just go back to page 1 {CEL00000452/1},  
 23 please, you can see a heading "Mike" under  
 24 Chartwell House. It's been cut off at the bottom of the  
 25 screen.

1 A. Yeah.  
 2 Q. But if we can just scroll up a little, there, we can  
 3 see:  
 4 "Chartwell House - Southend - Tender.  
 5 "Windows & Cladding Refurb.  
 6 "DTZ Client/Architect.  
 7 "Mike."  
 8 Was that you?  
 9 A. I believe it was, yes.  
 10 Q. Right, okay.  
 11 We can see under "Grenfall (sic) Tower", "M/C  
 12 Rydens(sic)", misspelt and various other things.  
 13 Do you remember a meeting with Celotex in relation  
 14 to Chartwell House on 24 November?  
 15 A. I don't remember, although looking at that, I think it's  
 16 actually not referring to me at Chartwell House, I think  
 17 it's the one below.  
 18 Q. Ah, okay.  
 19 A. I think it's Premier House is the project.  
 20 Q. Right. You're interpreting this, as I am, but done  
 21 a better job.  
 22 A. Yeah.  
 23 Q. Yes, I understand. Okay, fine, and that would be  
 24 consistent with the Salesforce entry we looked at  
 25 earlier, where you were having a meeting or discussion

1 with Jonathan Roome at Celotex on the subject of  
 2 Premier Inn on 24 November 2014.  
 3 A. That's right, yes.  
 4 Q. Do you remember what was discussed with Mr Roome at that  
 5 meeting?  
 6 A. I don't, I'm afraid, no.  
 7 Q. If we go to {CEL00000018}, please. This is an email the  
 8 same date, late at night, 24 November 2014, from  
 9 Jonathan Roome to others, I think, but certainly to  
 10 Daniel Anketell-Jones:  
 11 "Re: Celotex Project Review.  
 12 "Hi Dan,  
 13 "I spoke with Mark and the team regarding a few  
 14 projects."  
 15 You can see the projects set out there:  
 16 Grenfell Tower, Premier House, Chartwell House,  
 17 Southend, and Premier Inn, Terminal 4, Heathrow.  
 18 "Mike had a new project to review."  
 19 We can see from the top, certainly under  
 20 Grenfell Tower, that RS5000 was discussed in the context  
 21 of that project.  
 22 Do you remember having any discussion at all on that  
 23 date with Jonathan Roome at Harley House about RS5000?  
 24 A. In relation to Grenfell Tower or other projects?  
 25 Q. In relation to any project.

1 A. I can't recall, I'm afraid.  
 2 Q. Right.  
 3 Do you remember whether there were any discussions  
 4 in Harley, either at or after this meeting, about  
 5 RS5000?  
 6 A. Not that I was involved in, no.  
 7 Q. Right.  
 8 Do you remember whether you saw a brochure relating  
 9 to RS5000 or any other sales literature?  
 10 A. Not that I can remember, no.  
 11 Q. Do you remember Mr Roome being provided with any  
 12 drawings or other documents in relation to the  
 13 Grenfell Tower project?  
 14 A. Again, I -- as I say, I wasn't involved in the job  
 15 particularly then, so I wouldn't have been involved in  
 16 that discussion.  
 17 Q. All right.  
 18 Can I ask you to go to paragraph 30 of your  
 19 statement, please, at page 7 {HAR00010151/7}. We can  
 20 see under that paragraph you are providing a response to  
 21 a question at paragraph 4(i), and the question was:  
 22 "Was specific consideration given to the combination  
 23 of the exterior components (e.g. cladding, insulation,  
 24 windows, and methods of fixing) and the fire safety,  
 25 fire-retardancy and compliance with safety standards of

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1 the same?"  
 2 Your answer was:  
 3 "I was not involved in this area of work, but  
 4 I would expect that this would have been looked at by  
 5 the architects and the Harley design team, with advice  
 6 from the product manufacturers."  
 7 You say "Harley design team", and then you go on at  
 8 paragraph 40 at page 9 {HAR00010151/9} -- I just want to  
 9 show you that first before I ask you the questions about  
 10 it -- and the question there that you're addressing is:  
 11 "What was the chain of decision-making,  
 12 communication and responsibility about the cladding,  
 13 insulation, windows and fixings?"  
 14 At paragraph 40 you say, four lines down:  
 15 "Someone in a technical position at Harley would  
 16 also have been looking to determine whether any given  
 17 product was suitable and they would be reliant on the  
 18 supplier."  
 19 My question is: which particular person at Harley  
 20 did you have in mind when you referred to the "design  
 21 team", the "Harley design team"?  
 22 A. It would have been either Ray Bailey or  
 23 Daniel Anketell-Jones.  
 24 Q. I see. What about Kevin Lamb as well?  
 25 A. Yes, probably him as well, because he was designing the

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1 job under, I think, Daniel.  
 2 Q. I see.  
 3 When you refer to "someone in a technical position",  
 4 again, same question: who were you referring to?  
 5 A. As I say, either Ray or Daniel.  
 6 Q. And anybody else?  
 7 A. Possibly Kevin, but again, not being in that department,  
 8 it was their -- you know, I'm not aware of what their  
 9 system was for checking products, so you have to speak  
 10 to them, really, I'm afraid.  
 11 Q. At the end of that paragraph, you say:  
 12 "The supplier would be told what the product in  
 13 question was going to be used for, and would be sent the  
 14 relevant NBS specification and drawings dealing with  
 15 that part of the building. The ultimate decision would  
 16 rest with the architects in relation to all design  
 17 matters."  
 18 Do you remember whether Alcoa, who made Reynobond at  
 19 the time, were sent the NBS specification?  
 20 A. I don't know. As I say, the NBS was sent to CEP, but  
 21 I don't know whether that was forwarded on to Alcoa.  
 22 Q. Do you remember whether Celotex was sent the  
 23 NBS specification for Grenfell?  
 24 A. I didn't send it myself but it may have been sent later  
 25 on.

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1 Q. Can we turn to {HAR0001018}, please. This is an email  
 2 from you to Jason Bethel at Rydon of 23 July 2014, and  
 3 you say there:  
 4 "Further to our telephone conversation, please find  
 5 enclosed the following information.  
 6 "Within our works package, there is approximately  
 7 4,076 m2 of insulation on the project, the value of the  
 8 insulation (material only) is £50,945."  
 9 Now, as we can see from that, this email followed  
 10 a telephone conversation that you had had. Do you  
 11 remember that telephone conversation?  
 12 A. I don't, I am afraid.  
 13 Q. Do you remember roughly what it was about, or do we just  
 14 have to go on this email?  
 15 A. No, I'm afraid I don't remember, sorry.  
 16 Q. Right.  
 17 Do you know why Rydon didn't know how much  
 18 insulation was in their work package that they had sent  
 19 Harley?  
 20 A. In terms of cost or the --  
 21 Q. In terms of measurement, square metres, area.  
 22 A. I don't believe it was actually put in the quotation  
 23 document.  
 24 Q. No.  
 25 A. The actual metrage.

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1 Q. No. So do you know why it was that Rydon didn't  
2 themselves know what the area of insulation was that was  
3 required for the Grenfell Tower project, as this email  
4 suggests?  
5 A. Possibly because they didn't measure it from the  
6 drawings, they relied on Harleys to actually do that.  
7 Q. I see.  
8 Do you know how you came to the value of £50,945 for  
9 the insulation?  
10 A. I don't, without seeing the pricing documents. It would  
11 have been what the cost was for insulation in the  
12 quotation.  
13 Q. I work that out as £12.49 per square metre, assuming my  
14 arithmetic is right. Does that ring a bell with you?  
15 A. No, I'm afraid it doesn't.  
16 Q. You can't help us as to where you got that figure from?  
17 A. It's a long time ago, I'm afraid. Without seeing my  
18 pricing documents -- you know, I've priced so many  
19 projects since then. I'm trying to recall something  
20 from six/seven years ago.  
21 Q. Was Rydon enquiring, do you remember, as to the cost of  
22 the insulation, or were you simply volunteering that  
23 information?  
24 A. I think that was a request, because I've said --  
25 obviously referred to the conversation, and they've

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1 requested that, the cost and the square metreage.  
2 Q. Did it strike you as odd that it was only asking about  
3 the cost of the insulation at this stage in the project,  
4 mid-July or late July 2014?  
5 A. I can't remember what I actually thought at the time,  
6 but just having seen other documents recently, I believe  
7 it's to do with possibly changing the insulation over to  
8 a different product. They wanted to know how much cost  
9 was in there for that and the area. Again, I'm just  
10 relying on information I've seen recently.  
11 Q. Do you know when you first priced up the Celotex FR5000,  
12 the product originally stipulated in the  
13 NBS specification?  
14 A. What, the actual project itself or just a cost base?  
15 Q. Cost for Grenfell.  
16 A. It would have been back in December/January.  
17 Q. I see. So not in this email?  
18 A. No.  
19 Q. I see.  
20 Can we then turn to a different document, which is  
21 a document generated in January 2015 called the Harley  
22 spec or Harley specification. This is {RYD00046822},  
23 please. This is a document which looks as if it was  
24 generated initially by Kevin Lamb on 15 January 2015, if  
25 you look at the bottom right-hand corner, and it went

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1 through a number of different revisions through to the  
2 middle of July 2015, as you can see from the revision  
3 box at the bottom.  
4 Were you involved in any way in compiling this  
5 document?  
6 A. No, not at all.  
7 Q. Did you ever see this document during your involvement  
8 on the Grenfell Tower project?  
9 A. I might have seen it in passing, but by 2015, I was not  
10 involved in the project.  
11 Q. Right.  
12 Were you involved in pricing the items at P1 and P2  
13 on the left-hand side there, the glazing P1 panels and  
14 the glazing P2 panels?  
15 A. Sorry, I can't see the --  
16 Q. You can't, I'm so sorry.  
17 A. That's all right.  
18 Q. Can you be shown the left-hand side. You will see  
19 glazing P1 --  
20 A. Right, okay.  
21 Q. -- where the P1 panels have a core of styrofoam, and the  
22 glazing P2, which have a core of 25-millimetre Kingspan  
23 TP10 rigid insulation. Do you remember quoting for  
24 those?  
25 A. Yes, they would have been in the original quotation.

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1 Q. Yes.  
2 Are you able to shed any light on any changes to  
3 those specifications later, or were you just not  
4 involved in the project by this stage --  
5 A. That's right, no any change --  
6 Q. -- and later.  
7 A. Yeah.  
8 Q. Now, we can see earlier that you were present at  
9 a meeting on 24 November when RS5000 was discussed, it  
10 appears.  
11 Do you know why RS5000 -- or FR5000, either of  
12 those, but I think by this stage RS5000 -- was omitted  
13 from this specification?  
14 A. No, I don't know.  
15 Q. Would it be usual to omit the insulation specification  
16 when designing a façade system?  
17 A. It's possible it may change once the project had been  
18 won and it actually reached design stage, things do  
19 change, but it all goes through to approval from the  
20 architect, any changes.  
21 Q. I see.  
22 Does this tell us, though, that you yourself can't  
23 shed any light on why either FR5000 or RS5000 were not  
24 referred to specifically in this specification?  
25 A. That's right, I wasn't involved, so I don't know.

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1 MR MILLETT: Very good.  
 2 Well, Mr Albiston, Mr Chairman, I've come to the end  
 3 of my questions that I've prepared. There may be one or  
 4 two others that I may have skipped over in my keenness  
 5 to get to this point.  
 6 SIR MARTIN MOORE-BICK: Yes. If we had ten minutes or so,  
 7 that would be enough, would it?  
 8 MR MILLETT: That should be enough, yes.  
 9 SIR MARTIN MOORE-BICK: Well, Mr Albiston, counsel thinks he  
 10 has reached the end of the questions but needs  
 11 an opportunity to take stock and check there aren't  
 12 things he ought to have asked you. So we're going to  
 13 take a short break now. We will come back at 12.50,  
 14 please, and see if there are any more questions at that  
 15 point. All right?  
 16 THE WITNESS: That's fine, thank you.  
 17 SIR MARTIN MOORE-BICK: Again, please don't talk to anyone  
 18 about your evidence while you're out of the room.  
 19 THE WITNESS: Okay, thank you.  
 20 SIR MARTIN MOORE-BICK: You go with the usher, please.  
 21 Thank you.  
 22 (Pause)  
 23 Right, 12.50, then. Thank you.  
 24 (12.38 pm)  
 25 (A short break)

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1 (12.50 pm)  
 2 SIR MARTIN MOORE-BICK: Right, Mr Albiston, we will see.  
 3 Mr Millett, do you have some more questions?  
 4 MR MILLETT: I have one, Mr Albiston, and it arises out of  
 5 an answer that you gave me in your evidence very shortly  
 6 before we finished, when I was asking you about Celotex.  
 7 This is today, {Day35/90:13} and I'll just show this to  
 8 you.  
 9 My question at line 11 was:  
 10 "What was the product that was going to be used as  
 11 contemplated by this quotation?"  
 12 It was the quotation that we looked at earlier.  
 13 Your answer was:  
 14 "It was going to be either Celotex or a similar  
 15 insulation product."  
 16 What did you mean or what were you referring to by  
 17 "a similar insulation product", do you think?  
 18 A. Well, an insulation product that would actually give  
 19 a similar performance to Celotex.  
 20 Q. In your mind at the time, what was that?  
 21 A. I didn't have an opinion at the time that was at, but  
 22 again, that would have been a technical point brought up  
 23 by the technical team on -- at Harley.  
 24 Q. When you say "a similar performance", similar in what  
 25 respect?

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1 A. In terms of what -- the thermal properties of it or if  
 2 there's any fire properties or whatever.  
 3 Q. So you would include fire safety performance in that?  
 4 A. I think it probably would be, yes, if it was particular  
 5 for that product, yes.  
 6 Q. I see. Does that tell us that, at the time, you didn't  
 7 see any distinction between different products,  
 8 different insulation products, as regards fire  
 9 performance?  
 10 A. No, I didn't.  
 11 MR MILLETT: Right, okay.  
 12 Thank you very much, Mr Albiston, I have no further  
 13 questions for you. I just wish to say thank you to you  
 14 for coming to the Inquiry and assisting us with our  
 15 investigations. So thank you very much.  
 16 SIR MARTIN MOORE-BICK: Yes. Well, we are very grateful to  
 17 you, Mr Albiston, for coming along, it's very helpful to  
 18 have had your evidence, and now you're free to go.  
 19 THE WITNESS: Okay, thank you.  
 20 SIR MARTIN MOORE-BICK: Thank you. If you would like to go  
 21 with the usher, she will look after you.  
 22 (The witness withdrew)  
 23 SIR MARTIN MOORE-BICK: Well, now, Mr Millett, it would  
 24 probably be convenient to adjourn at this point and  
 25 start our next witness at 2 o'clock.

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1 MR MILLETT: Very good, Mr Chairman, thank you very much.  
 2 SIR MARTIN MOORE-BICK: 2 o'clock, then, please. Thank you.  
 3 (12.54 pm)  
 4 (The short adjournment)  
 5 (2.00 pm)  
 6 SIR MARTIN MOORE-BICK: Yes, Ms Grange.  
 7 MS GRANGE: Good afternoon, Mr Chairman.  
 8 SIR MARTIN MOORE-BICK: Who is the next witness?  
 9 MS GRANGE: It's Mr Daniel Anketell-Jones.  
 10 SIR MARTIN MOORE-BICK: Good, thank you.  
 11 MR DANIEL ANKETELL-JONES (affirmed)  
 12 SIR MARTIN MOORE-BICK: Thank you very much,  
 13 Mr Anketell-Jones. Sit down, make yourself comfortable.  
 14 Now, we shall have a break roughly halfway through  
 15 the afternoon, but if at any stage you feel you need to  
 16 have an additional break, will you just tell me? All  
 17 right. Thank you.  
 18 Yes, Ms Grange.  
 19 Questions from COUNSEL TO THE INQUIRY  
 20 MS GRANGE: Thank you.  
 21 Thank you, Mr Anketell-Jones, thank you very much  
 22 for attending today to give evidence. It's very much  
 23 appreciated.  
 24 If you have any difficulty understanding anything  
 25 I'm asking you in the course of your evidence, please

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1 ask me to repeat the question or put the point in a  
 2 different way.  
 3 If you feel you need a break at any point, please  
 4 let us know.  
 5 Could you please try and keep your voice up so that  
 6 the transcriber lady there to your right can take down  
 7 a good note of what you are saying.  
 8 Now, you have made two statements to the Inquiry.  
 9 I want to take you to them. They're in a folder on your  
 10 desk in front of you and they'll appear on the screen.  
 11 The first is dated 8 November 2018 and it's to be found  
 12 at {HAR00010149}. If we can look on at page 18  
 13 {HAR00010149/18} of that statement, is that your  
 14 signature there at the bottom?  
 15 A. Yes, it is.  
 16 Q. Thank you. Have you read that statement recently?  
 17 A. Yes.  
 18 Q. Can you confirm that the contents are true?  
 19 A. Yes.  
 20 Q. Now, the second statement to the Inquiry was made on  
 21 19 March 2019. If we pull that up, that's at  
 22 {HAR00010513}, and if you can go to page 2  
 23 {HAR000105/13/2} of that, again, is that your signature  
 24 at the bottom of that statement?  
 25 A. Yes.

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1 Q. Have you read that recently?  
 2 A. No.  
 3 Q. Can you confirm the contents are true? That's the short  
 4 statement that you deal with the deletion of certain  
 5 items from your laptop computer.  
 6 A. Yes, it's true.  
 7 Q. Thank you.  
 8 You also made a statement to the Metropolitan Police  
 9 Service dated 9 December 2019. If we can pull that up,  
 10 it's at {MET00064867}. That's a very short statement,  
 11 just two pages, and that's in the final tab on your  
 12 desk.  
 13 Can you confirm that the contents of that statement  
 14 are true?  
 15 A. Yes.  
 16 Q. Thank you.  
 17 Have you discussed your statements or evidence with  
 18 anybody before coming here today?  
 19 A. No.  
 20 Q. Thank you.  
 21 Now, I wanted to start by considering your  
 22 background and your qualifications.  
 23 If we look at paragraph 4 of your first, main  
 24 statement -- this is at {HAR00010149}, and if we zoom in  
 25 on paragraph 4 -- you tell us there in the first

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1 sentence that you graduated from the University of  
 2 Sussex in 2003 with a BEng in electrical and mechanical  
 3 engineering, robotics and automated manufacturer. Do  
 4 you see that there?  
 5 A. Yes.  
 6 Q. You go on within that paragraph to explain that, after  
 7 finishing that degree, you initially worked with  
 8 a company called Bespoke Design Services; is that  
 9 correct?  
 10 A. Yes.  
 11 Q. What kind of work did that company do?  
 12 A. Curtain wall design.  
 13 Q. And cladding design or just curtain wall?  
 14 A. Curtain wall and windows, from memory.  
 15 Q. Right. How big was that company?  
 16 A. Initially there was two people, and I think at its  
 17 largest point it was probably five.  
 18 Q. Is it right that the founder of that company and your  
 19 boss at the time was Mr Kevin Lamb; is that correct?  
 20 A. Yes, that's correct.  
 21 Q. Did you know him before you worked at Bespoke Design  
 22 Services?  
 23 A. No.  
 24 Q. What was your initial role title when you worked for  
 25 that company?

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1 A. I think it was project designer, as it says there.  
 2 Q. Yes. Can you help us as to what that involved in  
 3 practice?  
 4 A. So you would take the design by the architect and  
 5 turn -- take the system details and put them together  
 6 into a way that could be then manufactured. So it was  
 7 mainly to do with producing fabrication drawings for the  
 8 factory.  
 9 Q. Just to be clear, that was for windows and curtain  
 10 walling; is that correct?  
 11 A. That's correct.  
 12 Q. So did your role involve designing façades?  
 13 A. No, it was designing fabricated components.  
 14 Q. You say at paragraph 4 of your witness statement that  
 15 you were quickly promoted to the position of project  
 16 designer. Roughly how long before you were promoted,  
 17 can you recall?  
 18 A. No, I can't. I think it's when the company grew in size  
 19 a bit.  
 20 Q. Yes, and was it Mr Kevin Lamb who promoted you?  
 21 A. Yes.  
 22 Q. Did you undertake any formal design training or  
 23 qualifications in order to undertake your role as  
 24 project designer for that company?  
 25 A. I think I want to one of the curtain wall companies for

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1 a few training courses, Schueco.  
 2 Q. Roughly how much time did you spend on those training  
 3 courses, can you remember?  
 4 A. I think it equated to a couple of days.  
 5 Q. What type of projects did you work on? Was there  
 6 a theme in terms of the type of projects that you ...?  
 7 A. No, it was a sort of design outsourcing company, so it  
 8 was just different façade companies would come to them  
 9 to, you know, draw up their sort of fabrication  
 10 drawings.  
 11 Q. In that role as project designer, were you required to  
 12 consider the fire performance of materials?  
 13 A. No.  
 14 Q. Now, looking again at paragraph 4 of your statement, at  
 15 the end there you say you then moved from Bespoke Design  
 16 Services to Boustead International Heaters Limited. Was  
 17 that in around 2006?  
 18 A. Yeah, I would have thought so.  
 19 Q. And what did your role in that organisation entail?  
 20 A. That was working as a project engineer for -- basically  
 21 they did oil heaters for the oil refinery, so the role  
 22 involved working to sort of put together the fabrication  
 23 components to get them sent out to where they were going  
 24 to be installed.  
 25 Q. So am I right that that was nothing to do with the

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1 design of cladding or curtain walling or any external  
 2 façades?  
 3 A. No, it wasn't.  
 4 Q. You explain in paragraphs 4 and 5 of your statement that  
 5 you had been working there for about six months before  
 6 moving to Harley Curtain Wall in November 2006; is that  
 7 correct?  
 8 A. Yeah, that's correct.  
 9 Q. Now, what role were you initially employed in for  
 10 Harley?  
 11 A. I think it was project engineer.  
 12 Q. What were your general duties as project engineer?  
 13 A. The same thing as when I was working at Bespoke Design;  
 14 it was taking the architects' drawings and putting them  
 15 into the system, drawings that could then be fabricated.  
 16 Q. Were you designing façades for Harley at any stage?  
 17 A. No, I was designing fabricated components.  
 18 Q. I see, so you're drawing that distinction between being  
 19 the designer of the façade and being the person who is  
 20 designing the fabricated components; is that correct?  
 21 A. Yes, that's correct.  
 22 Q. Did you receive any formal training from Harley in  
 23 respect of that role?  
 24 A. Very -- towards the end of my time with Harley I started  
 25 an MSc in façade engineering with them.

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1 Q. Yes, I'm going to come to that in a moment.  
 2 So had you obtained any qualifications when you  
 3 initially started working for Harley to assist you in  
 4 your design of fabrication designs?  
 5 A. No, the other thing I did was an MSc in structural  
 6 engineering, because there was -- the structural  
 7 engineering at that time was subbed out to a structural  
 8 engineering firm and there were issues with  
 9 communicating what you needed from them, so they decided  
 10 having a structural engineer in house would make that  
 11 part easier.  
 12 Q. Yes.  
 13 When were you promoted to the role of design manager  
 14 in Harley?  
 15 A. I can't remember. It would probably be on my CV.  
 16 Q. Was it before the Grenfell project or do you think  
 17 during it?  
 18 A. Yeah, it would be before that.  
 19 Q. A long time before or ...?  
 20 A. I can't remember.  
 21 Q. You can't remember.  
 22 So, as you have just mentioned, in paragraph 7 of  
 23 your statement, if we can go to that on page 2  
 24 {HAR00010149/2} of this document, you say that:  
 25 "Whilst working for Harley, I obtained an MSc in

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1 Structural Engineering from the University of Surrey ...  
 2 and started an MSc in Façade Engineering from the  
 3 University of Bath (2014 to 2017)."  
 4 Is that correct?  
 5 A. That's correct.  
 6 Q. Now, what did your MSc in façade engineering involve?  
 7 A. It involved attending the University of Bath for a week  
 8 at a time, and studying particular topics.  
 9 Q. Did it include looking at the design of façades?  
 10 A. Yes.  
 11 Q. Did it include any teaching about the fire performance  
 12 of façades?  
 13 A. Yes, but not until I had left Harley.  
 14 Q. Is it right that the MSc includes one optional module on  
 15 acoustics and fire?  
 16 A. That's correct.  
 17 Q. And did you take that module?  
 18 A. Yeah, I took that after I had left Harley Curtain Wall.  
 19 Q. Was there any other teaching on the course about fire  
 20 performance or the testing and classification of façade  
 21 materials more generally?  
 22 A. Not that I can remember.  
 23 Q. So is it right that, until you did that module of that  
 24 course, you hadn't had any academic training in terms of  
 25 fire performance?

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1 A. No.  
 2 Q. Did the course include anything on the requirements  
 3 under the Building Regulations 2010?  
 4 A. There were different parts of the course that covered  
 5 different parts of the Building Regulations.  
 6 Q. Yes.  
 7 A. So parts of them did. So for example there was  
 8 a thermal course that would have covered part L.  
 9 Q. Yes.  
 10 A. And for the fire course, it would have covered part B.  
 11 Q. I see. So it wasn't until you did the fire module on  
 12 acoustics and fire that you would have looked at part B?  
 13 A. (Witness nods).  
 14 Q. Yes.  
 15 SIR MARTIN MOORE-BICK: I'm sorry, Mr Anketell-Jones, it's  
 16 very natural to nod or shake your head, but  
 17 unfortunately it doesn't go on the transcript too well.  
 18 A. Sorry.  
 19 SIR MARTIN MOORE-BICK: So if you could please try and  
 20 remember to say yes or no as well.  
 21 A. Yes, sir.  
 22 SIR MARTIN MOORE-BICK: Thank you.  
 23 MS GRANGE: Yes, so I think you just confirmed that it  
 24 wasn't until you did the fire module on acoustics and  
 25 fire that you would have looked at part B of the

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1 Building Regulations; is that correct?  
 2 A. Yes, that's correct.  
 3 Q. Mr Ray Bailey last week in his evidence said that you  
 4 were about three-quarters of the way through this MSc in  
 5 façade engineering at the time of your work on the  
 6 Grenfell project. Is that correct?  
 7 A. No, it's incorrect. I didn't start until the end of  
 8 2014.  
 9 Q. So if you were to estimate how far through you were that  
 10 course during the time you worked on the Grenfell  
 11 project, what would you say?  
 12 A. Probably done one module, so probably -- I think the  
 13 last module counts as two, so probably about a 12th of  
 14 the way through.  
 15 Q. Yes.  
 16 Were you aware when you undertook that course that  
 17 the Department of Civil Engineering at Bath University  
 18 works closely with the Centre of Window and Cladding  
 19 Technology, the CWCT, to provide an industry-relevant  
 20 course on façade engineering?  
 21 A. Yes, I was.  
 22 Q. When did you first become aware of the CWCT as  
 23 an industry organisation?  
 24 A. I think when we started discussing taking the MSc on, so  
 25 probably earlier that year.

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1 Q. Yes. So does that mean earlier in 2014?  
 2 A. Yeah.  
 3 Q. At the time you worked on the Grenfell project, would  
 4 you have said that you were well placed within Harley to  
 5 advise on whether particular materials complied with the  
 6 Building Regulations?  
 7 A. Only of a structural nature.  
 8 Q. So you were only able to advise on whether the  
 9 structural performance of those materials was adequate  
 10 under the Building Regulations; is that correct?  
 11 A. That's correct.  
 12 Q. And what about the guidance in Approved Document B, how  
 13 familiar were you with that at the time of the Grenfell  
 14 project?  
 15 A. Not very at all.  
 16 Q. Did Harley provide you with any training or ongoing  
 17 continuing professional development to assist you in  
 18 your role as design manager?  
 19 A. The role as design manager was to manage the programme  
 20 of others, so there wasn't much training that could be  
 21 given for that. But for the structural part --  
 22 Q. So is the answer to my question no, that you weren't  
 23 provided with --  
 24 A. No.  
 25 Q. -- ongoing professional development by Harley?

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1 A. No.  
 2 Q. Now, I just want to look briefly now at an email that  
 3 we're going to come back to later and look at in much  
 4 more detail, but I won't go to it now. This is at:  
 5 {CEL00000019/2}.  
 6 Going down that page, I want to look at the email  
 7 you send on 16 January 2015 at 11.27. Can you just  
 8 quickly familiarise yourself with that email, in terms  
 9 of what you say there. This is an email from you to  
 10 Jonathan Roome at Celotex.  
 11 (Pause)  
 12 A. Yeah.  
 13 Q. So you're saying there in the second line:  
 14 "We are being asked by one of our clients to see the  
 15 test results and certificates for the RS5000  
 16 insulation."  
 17 Then you're asking various questions about the  
 18 BS 8414-2:2005 testing in the next paragraph, and then  
 19 you're also asking about the BS 476-7 testing in the  
 20 next paragraph.  
 21 Now, as I say, I'm going to come back and ask you a  
 22 lot more detailed questions later about this, but I just  
 23 want to ask you: do you agree that it's evident from  
 24 this that you are familiar with BS 8414 testing,  
 25 including the results of that testing?

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1 A. No, this would have been that I had been asked for  
 2 something specific by one of the clients, and was just  
 3 basically passing it through, requesting the same  
 4 information to send it back.  
 5 Q. I see. So is what you are saying that you have received  
 6 a request from a client, and the information you're  
 7 asking for here and the detail you have got in this  
 8 email is just you simply passing that on to Celotex?  
 9 A. Yeah, just passing on their specific request.  
 10 Q. So the same question about the BS 476-7 testing that you  
 11 deal with in the third paragraph there: were you  
 12 familiar with that kind of testing at the time you wrote  
 13 that email?  
 14 A. No, I wasn't.  
 15 Q. Did you know at the time you wrote it what BS 476-7  
 16 testing was relevant to when it comes to the  
 17 classification of materials?  
 18 A. I knew it was relevant to fire testing, that was all.  
 19 Q. That was it, was it? You didn't know anything more  
 20 about it?  
 21 A. No.  
 22 Q. Do you know what classification you might have achieved  
 23 if you had successfully undertaken that test and other  
 24 tests?  
 25 A. Not at that stage, no.

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1 Q. Were you familiar with a document called BR 135, "Fire  
 2 performance of external thermal insulation for walls of  
 3 multistorey buildings", produced by the British Research  
 4 Establishment? Were you familiar with that publication?  
 5 A. I had heard it mentioned and people had talked about it  
 6 in support of using certain façades, but it was always  
 7 something I passed through to the clients.  
 8 Q. So had you read that publication at the time of the  
 9 Grenfell project?  
 10 A. No.  
 11 Q. So you hadn't received any formal training, or indeed  
 12 informal training, about the testing and classification  
 13 regimes in the UK at this time?  
 14 A. No.  
 15 Q. Did Harley provide you with any formal or informal  
 16 training to keep you up to date with the  
 17 Building Regulations?  
 18 A. No.  
 19 Q. What about something called Approved Document B on  
 20 fire safety?  
 21 A. No.  
 22 Q. Had you read Approved Document B at the time of the --  
 23 A. No.  
 24 Q. -- Grenfell project?  
 25 A. My role was as a structural engineer and a design

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1 manager, so I didn't have any requirement to.  
 2 Q. Were you or Harley at the time of the Grenfell project  
 3 a member of any industry bodies relevant to façade  
 4 design?  
 5 A. No. Harley may have been. I think, yeah, Harley were  
 6 a member of the CWCT.  
 7 Q. Were you aware of that at the time of the Grenfell  
 8 project, that Harley were a member of the CWCT?  
 9 A. I can't remember.  
 10 Q. You can't remember?  
 11 A. No.  
 12 Q. What about you personally, were you ever personally  
 13 a member of the CWCT?  
 14 A. No.  
 15 Q. Do you recall attending CWCT members' meetings?  
 16 A. I can remember going to a talk in London or something  
 17 like that, but I can't remember what it was on, or  
 18 whether it was CWCT or not.  
 19 Q. Okay.  
 20 What about any other industry or trade associations  
 21 to do with façades or external walls?  
 22 A. No.  
 23 Q. You don't remember Harley or yourself being a member of  
 24 any?  
 25 A. No.

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1 Q. At the time, did you think it was necessary for  
 2 a specialist cladding contractor to engage with trade  
 3 associations to keep up to date with relevant knowledge  
 4 and industry developments?  
 5 A. It wasn't something that I'd thought of. It was  
 6 something for the senior management to make those  
 7 decisions.  
 8 Q. Yes, and they never suggested that you should keep up  
 9 with those type of industry --  
 10 A. No.  
 11 Q. -- bodies or publications?  
 12 A. No, I kept up to date with my structural CPD.  
 13 Q. Yes.  
 14 A. But that was where my feeling of responsibility for my  
 15 CPD stopped.  
 16 Q. Was that something you did off your own bat on your  
 17 own --  
 18 A. Yeah.  
 19 Q. -- or was that something you were encouraged to do by  
 20 senior leaders at Harley?  
 21 A. It was something I did on my own out of a feeling of  
 22 needing to progress and keep up with current  
 23 legislation.  
 24 Q. Yes.  
 25 Now, in terms of your role on the Grenfell project,

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1 if we go back to your statement on page 2  
 2 {HAR00010149/2} and we look at paragraph 9. So you say  
 3 there in the first sentence that you were involved in  
 4 the refurbishment project for Grenfell Tower over  
 5 a period of about a year in the capacity of design  
 6 manager; do you see that there?  
 7 A. Yes.  
 8 Q. I think you told us earlier that you were promoted to  
 9 the role of design manager before you worked on the  
 10 Grenfell project; is that right?  
 11 A. Yes.  
 12 Q. So you had acted as design manager for other major  
 13 projects for Harley?  
 14 A. Yes.  
 15 Q. In his evidence last week, Mr Ray Bailey indicated that,  
 16 at the time of the Grenfell project, you were the  
 17 technical manager, and that your job was to assess the  
 18 technical compliance of products. That was at  
 19 {Day32/17:21}. Do you agree with that? Were you the  
 20 technical manager?  
 21 A. No, I don't. I don't think I was made a technical  
 22 manager until, I don't know, end of 2015, beginning of  
 23 2016, perhaps, because I hadn't had any training in that  
 24 area yet.  
 25 Q. So there was a distinction, was there, within Harley

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1 between the role of design manager, which you say you  
 2 did perform, and the role of technical manager, which  
 3 you say you didn't perform until later; is that correct?  
 4 A. That's correct.  
 5 Q. As design manager, was your job or part of your job to  
 6 assess the technical compliance of products?  
 7 A. No.  
 8 Q. Whose role was that within Harley, under your  
 9 understanding?  
 10 A. Prior to the technical -- the previous technical manager  
 11 leaving, it would have been him. After he left, I'm not  
 12 sure who that fell on.  
 13 Q. Who was that, when you are talking about him leaving?  
 14 A. That would have been Graham Hackley.  
 15 Q. Graham Hackley.  
 16 When a technical manager was appointed after his  
 17 departure, who was that?  
 18 A. There wasn't one appointed until I'd done enough of the  
 19 degree to sort of start moving into that role.  
 20 Q. I see, so that was the factor, was it, that meant you  
 21 ended up as technical manager --  
 22 A. Yeah.  
 23 Q. -- having done enough of that facade engineering degree?  
 24 A. I think back then the commercial manager was struggling  
 25 to win work, because there wasn't enough technical

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1 support, so he was keen for me to move over to that role  
 2 and help at the front end of the business.  
 3 Q. When you were the technical manager at Harley, did you  
 4 understand it to be part of your job to assess the  
 5 technical compliance of products?  
 6 A. Not at that point, because I wasn't qualified yet.  
 7 Q. So at what point did you think you were --  
 8 A. It would have been when I would have qualified to have  
 9 been able to, you know, cast opinions across the full  
 10 range of performance requirements.  
 11 Q. Did you ever get to that stage while you worked for  
 12 Harley?  
 13 A. No.  
 14 Q. No.  
 15 Now, at paragraph 6 of your witness statement on  
 16 page 2 {HAR00010149/2}, you say there in the first line:  
 17 "What was involved in the role of a Design Manager  
 18 depended on a particular project and who else was on the  
 19 team, but on the whole, it included being the designer  
 20 on individual projects as well as ensuring that the  
 21 other projects had sufficient design resource  
 22 (a designer) and that they kept to the building works  
 23 programme."  
 24 Do you see that there?  
 25 A. Yes.

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1 Q. So can you just describe for us in a little bit more  
 2 detail what your role as design manager generally used  
 3 to entail.  
 4 A. Usually I would have a couple of projects myself that  
 5 I'd actually be working on and drawing the fabrication  
 6 drawings for, and then there would be a couple of  
 7 designers in the office and it would be my  
 8 responsibility to make sure that they were keeping up  
 9 with their demands of work, making sure they were  
 10 keeping the project managers happy on site, and,  
 11 you know, maybe moving design resource around if  
 12 a particular project was running behind.  
 13 Q. Yes.  
 14 You also say in that last sentence of paragraph 6:  
 15 "This sometimes involved appointing external  
 16 subcontract designers (as was the case with Grenfell )."  
 17 Do you see that there?  
 18 A. Yes.  
 19 Q. Is an example of that the appointment of Kevin Lamb as  
 20 the external subcontract designer for the Grenfell Tower  
 21 project?  
 22 A. Yes, that's correct.  
 23 Q. Now, we will come back to his specific role later, but  
 24 can you explain in general: who was it at Harley that  
 25 would determine whether an external subcontractor would

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1 be required?  
 2 A. I think it was just known that there wasn't enough  
 3 design resource, and I think because -- do you mean in  
 4 general, or specifically for Grenfell?  
 5 Q. Who would take that decision on a project? Who would be  
 6 the person to say, "We need an external subcontract  
 7 designer on this project"? Would that be you or would  
 8 that be someone else in Harley?  
 9 A. I think I would probably feed back that there wasn't  
 10 enough resource, and then they could either make the  
 11 decision to bring in someone external or to employ more  
 12 people.  
 13 Q. What process would Harley normally go through to appoint  
 14 an external subcontract designer, can you help us on  
 15 that?  
 16 A. I think in the past, before Kevin, we had used a couple  
 17 of companies, and usually it was, you know, word of  
 18 mouth of other companies stating whether they were good  
 19 or not.  
 20 Q. Would Harley take any steps to ensure that these  
 21 external subcontract designers were competent to  
 22 undertake the role?  
 23 A. Not that I'm aware of.  
 24 Q. So you're not aware of any steps being taken to --  
 25 A. No, it would just be the -- you would probably seek

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1 other people's feedback.  
 2 Q. So would references be taken from professionals involved  
 3 in other projects about their competence?  
 4 A. Yeah, but it would be not on an official -- not in  
 5 an official way, it would be that you would call up  
 6 people that they would work with and get feedback that  
 7 way.  
 8 Q. We will come back to Kevin Lamb later, but can you  
 9 recall that happening with Kevin Lamb's appointment?  
 10 A. I think that Harley had worked with Kevin before, and  
 11 I don't think anyone raised any issues with working with  
 12 him again.  
 13 Q. Yes.  
 14 Now, if we can go to paragraph 14 of your witness  
 15 statement, this is at the bottom of page 3  
 16 {HAR00010149/3}, and on to page 4 {HAR00010149/4}, you  
 17 say there:  
 18 "As the Design Manager for the Grenfell project my  
 19 involvement included managing the Project Designer's  
 20 work, managing the flow of information between the  
 21 relevant project contractors or individuals, and helping  
 22 to ensure that we were keeping to the building works  
 23 programme and dealing with any issues that arose.  
 24 Because of my involvement in other projects I would  
 25 often be dipping in and out of the Grenfell project."

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1 Do you see that there?  
 2 A. Yes.  
 3 Q. Now, you say there that one of your roles was to manage  
 4 the project designer's work. Who was that on the  
 5 Grenfell project?  
 6 A. That would be Kevin Lamb.  
 7 Q. Given what you say there in that paragraph, does that  
 8 mean that you were not involved yourself in carrying out  
 9 the day-to-day design of the façade on the Grenfell  
 10 project?  
 11 A. As far as I can remember, that's correct. All I did  
 12 from a design point of view was the structural design.  
 13 Q. Right, yes.  
 14 Who was it that was doing the façade design, then,  
 15 in terms of --  
 16 A. Again --  
 17 Q. -- other aspects, not just structural?  
 18 A. Again, it's -- Kevin would be taking the architect's  
 19 drawings and turning them into fabrication drawings.  
 20 Q. Can you explain what your role involved in terms of  
 21 managing the project designer's work? What would that  
 22 involve?  
 23 A. So there -- at the beginning there wasn't a project  
 24 manager or a contracts manager involved, so it was to  
 25 try and get the design programme to meet the project

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1 programme, try and scope out what period he would need  
 2 for design, what period would be needed for approvals  
 3 from the client's team, and then any revisions that he  
 4 needed to do so that it could meet the fabrication  
 5 requirements.  
 6 Q. So it was scoping out periods he would need for design,  
 7 is that periods of time --  
 8 A. Yeah.  
 9 Q. -- he would need for design?  
 10 A. It would be basically trying to programme the works.  
 11 Q. Yes.  
 12 A. So, I mean, for example, you would kind of look at the  
 13 building, work out how many drawings you thought you  
 14 would need, and then try and roughly work out how long  
 15 that would take to do.  
 16 Q. Yes.  
 17 A. And make sure that he was keeping to that.  
 18 Q. Yes.  
 19 Did your role involve actually supervising the  
 20 design work that was being done by the project designer  
 21 on the project?  
 22 A. Supervising it in the sense of the programme, yes.  
 23 Q. But just limited to that, was it, only the programme?  
 24 A. Yeah.  
 25 Q. So you weren't looking at the adequacy of the project

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1 designer's work in any other way?  
 2 A. No, I'd pass those on to people in the company who  
 3 were -- well, from a structural point of view I would,  
 4 but from any other points of view, I would pass them on  
 5 to other people in the company.  
 6 Q. So who would you have been passing other aspects of the  
 7 design on to within the company?  
 8 A. People with more experience, like Mark Stapley or  
 9 Ray Bailey.  
 10 Q. I see. So in terms of supervising the extent to which  
 11 the design was compliant with the Building Regulations  
 12 and associated guidance, did you see that as part of  
 13 your role?  
 14 A. No.  
 15 Q. Was that made expressly clear to you when you worked at  
 16 Harley, or was that something that you just assumed?  
 17 A. I think with the amount of work I had on other projects,  
 18 I couldn't look at the designer's work. I can't  
 19 remember having a contract that said that it was or  
 20 wasn't involved.  
 21 Q. In terms of the supervision of the extent to which the  
 22 design was compliant with the Building Regulations, who  
 23 else within Harley did you think was responsible for  
 24 that?  
 25 A. I would have thought Mark Stapley and Ray Bailey.

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1 Q. Does that mean Mark Stapley and Ray Bailey were  
 2 frequently sent the work of Kevin Lamb to check it for  
 3 compliance?  
 4 A. I think so.  
 5 Q. You think so?  
 6 A. Yeah, I can remember passing drawings on that Kevin had  
 7 sent in to see if they were what they wanted.  
 8 Q. I see. Now, you say at paragraph 9 of your witness  
 9 statement {HAR00010149/2} that you were involved in the  
 10 Grenfell project for a period of about a year in that  
 11 capacity as design manager, this was between June 2014  
 12 and May 2015; is that correct?  
 13 A. Yeah, roughly. I think because I had started to help  
 14 out a lot with the estimating at that point, I was  
 15 probably moving away from it quite a lot from early  
 16 2015.  
 17 Q. Yes. What about before June 2014? Did you have any  
 18 involvement in the project prior to that?  
 19 A. I can't remember, but I don't believe I did.  
 20 Q. Yes.  
 21 You go on to say at paragraph 9, this is in the  
 22 fifth line:  
 23 "At the same time as being involved with the  
 24 Grenfell project I was also working as the designer on  
 25 two other Harley projects, Trinity Square (between

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1 February 2013 and October 2015) and Compass House  
 2 (between October 2015 and March 2016), as well as  
 3 managing the design resource on other projects. From my  
 4 recollection, most of my time was taken up designing  
 5 these two other projects."  
 6 Do you see that there?  
 7 A. Yes.  
 8 Q. Just pausing there, that last sentence, "most of my time  
 9 was taken up designing these two other projects", what  
 10 do you mean by "designing"? Do you mean just structural  
 11 design or do you mean broader design?  
 12 A. It would be -- order design, drawing the fabricated  
 13 components to be ordered.  
 14 Q. Sorry, I said "broader design"; I think you then said  
 15 "order design", did you?  
 16 A. Yeah, drawing the fabricated components for ordering.  
 17 Q. I see. So that's what you were doing on those two other  
 18 projects?  
 19 A. Yeah.  
 20 Q. Ordering fabricated components?  
 21 A. Drawing fabricated components so they could be ordered.  
 22 Q. I see.  
 23 You have said there that most of your time was taken  
 24 up on these two other projects, and you say something  
 25 similar at paragraph 14, last sentence, on page 4

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1 {HAR00010149/4}. You say:  
 2 "Because of my involvement in other projects I would  
 3 often be dipping in and out of the Grenfell project."  
 4 We looked at that earlier.  
 5 So is it right that your time was divided between  
 6 the design work on several different projects during  
 7 your time at Harley?  
 8 A. Yes, it was split between doing actual work on those two  
 9 other projects and then ensuring that Kevin was keeping  
 10 to the programme on the third project.  
 11 Q. I see, yes.  
 12 Were you working on any other projects at this time  
 13 other than those other two you have mentioned?  
 14 A. I would have been doing structural calculations on all  
 15 the projects going through at that time.  
 16 Q. What proportion of your time would you estimate you were  
 17 spending on the Grenfell project during that time, so  
 18 you have said between June 2014 and May 2015?  
 19 A. 5% perhaps.  
 20 Q. So very little of your time?  
 21 A. Yes.  
 22 Q. Were you very stretched at the time in terms of the work  
 23 you were having to do for Harley?  
 24 A. I think I was -- for the majority of this, I was almost  
 25 entirely focused on Trinity Square, because it was

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1 a project that had had a lot of problems and we had had  
 2 a lot -- a high staff turnover. I'd even for a while  
 3 been solely based on that site without being in the  
 4 office at all.  
 5 Q. Would it be fair to say that your time was limited when  
 6 you were monitoring and supervising the progress of the  
 7 Grenfell refurbishment project?  
 8 A. Yeah, I had -- I was focused on Trinity Square.  
 9 Q. Now, just a few questions about the deleted emails. You  
 10 have dealt with this topic in your second witness  
 11 statement. Can we just turn to this. This is  
 12 {HAR00010513}. At paragraph 3 on the first page, in the  
 13 first two sentences, you explain there that you left the  
 14 employment of Harley Façades Limited in March 2016:  
 15 "Prior to my leaving, it was agreed with the  
 16 Managing Director, Ray Bailey, that I could keep my work  
 17 laptop."  
 18 Do you see that there?  
 19 A. Yeah.  
 20 Q. You go on to say:  
 21 "To ensure I did not retain any Harley information,  
 22 it was agreed that I would delete it all from the  
 23 laptop. This included for example, access to the  
 24 server, all Harley emails, documents and design  
 25 drawings."

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1 Do you see that there?  
 2 A. Yes.  
 3 Q. Then you go on to say:  
 4 "Accordingly, on my last day of employment at the  
 5 end of March 2016, I deleted any and all Harley  
 6 information."  
 7 Do you see that there?  
 8 A. Yes.  
 9 Q. As a professional, were you aware that it might be  
 10 important to retain records of your work?  
 11 A. Yeah, but that's why I believe everything would be kept  
 12 on the company server, because all the laptops just  
 13 attached into the server.  
 14 Q. I see.  
 15 A. And all the emails were retained on there.  
 16 Q. So it was on that basis that you thought that the  
 17 information would be preserved in case it was required  
 18 in the future; is that correct?  
 19 A. That's correct.  
 20 Q. Now, you say at the end of paragraph 3 you believed at  
 21 the time that, whilst Harley's information would be  
 22 wiped from the laptop, it would be retained on the  
 23 company's server. Do you see that there?  
 24 A. Yes.  
 25 Q. You have just mentioned that in your evidence.

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1 Did you yourself check that before deleting the  
 2 information or was that an assumption you made?  
 3 A. Yeah, it was an assumption that I had made from the  
 4 system that had been set up.  
 5 Q. Can we just have a look at Mr Ray Bailey's witness  
 6 statement at this point. This is {HAR00010184/21}, and  
 7 I want to look at paragraph 83.  
 8 Now, in the very bottom three lines of that page --  
 9 actually, let's pick it up at the fourth from bottom  
 10 line, it says:  
 11 "As for Daniel Anketell-Jones, he left Harley some  
 12 months before the fire. By that stage he had both  
 13 deleted all of his Harley related emails from his laptop  
 14 and had arranged with our service provider to remove his  
 15 email file from our systems."  
 16 Do you see that there?  
 17 A. Yes.  
 18 Q. I just want to ask you what was meant or what you think  
 19 he might have meant by that last part "had arranged with  
 20 our service provider to remove his email file from our  
 21 systems"? Can you help us as to what he is referring to  
 22 there?  
 23 A. I never contacted the service provider to remove the  
 24 email from the systems, so I don't know what he means by  
 25 that.

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1 Q. Right, I see.  
 2 My question was going to be: if you had arranged to  
 3 remove your files from Harley's systems, how could you  
 4 have assumed that that information would remain on the  
 5 server? You know, you understand the point?  
 6 A. Yes, I understand the point, but --  
 7 Q. But you didn't arrange --  
 8 A. I didn't arrange for that to happen. I don't think  
 9 I would have had the authority or the security to do  
 10 that.  
 11 Q. So, as far as you were concerned, the information would  
 12 have stayed on Harley's server, and any emails, drawings  
 13 or documents which you sent or received in relation to  
 14 the project would have been recovered that way; is that  
 15 correct?  
 16 A. Yes, because in the past, where I had had a laptop break  
 17 or I had replaced a laptop, it was just a simple case of  
 18 connecting it back up to the server and you had all your  
 19 emails instantly once again.  
 20 Q. Are you aware of any information simply having been  
 21 lost? Is there any information you can recall that you  
 22 haven't seen in any Harley email since?  
 23 A. Not that stands out. It was a long time ago.  
 24 Q. Okay, yes.  
 25 Okay, I now want to just look at some of the

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1 previous projects you were involved in and turn to your  
 2 CV first . Now, this is a CV which was provided by Rydon  
 3 as part of their tender for the Grenfell Tower project,  
 4 and if we can pull this up at {ART00002087/44}. We can  
 5 see here this is a page that relates to you, "CV details  
 6 - Daniel Anketell-Jones", and then there is a profile  
 7 under this .

8 Can you recall ever seeing this CV before it was  
 9 submitted by Rydon?

10 A. No, I've never seen this document before.

11 Q. Now, if we look at the main paragraph under "Profile",  
 12 it says that:

13 "Daniel originally trained as a draughtsman. Daniel  
 14 has worked on a number of similar projects to Grenfell  
 15 Tower whilst with Harley. Daniel has been selected for  
 16 this project due to his experience with tower block  
 17 refurbishment schemes."

18 Do you see that there?

19 A. Yes.

20 Q. Now, it says there that you originally trained as  
 21 a draughtsman; is that correct?

22 A. Yes.

23 Q. When was that? When did you train as a draughtsman?

24 A. "Train" I think is a loose term. Basically I had worked  
 25 with Kevin Lamb at his company, you know, drawing up

1 details -- you know, when I first joined, it was drawing  
 2 up the details as he told me to draw them.

3 Q. Would you ever put in your own CV that you trained as  
 4 a draughtsman?

5 A. I don't think there's any reason why not to. I haven't.

6 Q. But you don't think it's inaccurate?

7 A. No.

8 Q. Okay. Then it says in the last line that you were  
 9 selected due to your experience with tower block  
 10 refurbishment schemes; do you see that there?

11 A. Yes.

12 Q. Then on the right, under the heading "Benefits to the  
 13 project", it says here:

14 "Daniel will provide the following specialist skill  
 15 set."

16 We have spec analysis, engineering, design  
 17 detailing, budgetary control, design liaison. Do you  
 18 see that there?

19 A. Yes.

20 Q. Are they all accurate?

21 A. No.

22 Q. Which ones do you not agree with?

23 A. Spec analysis, budgetary -- and budgetary control.

24 Q. Can you help us as to how those items might have  
 25 appeared in this CV that was put forward by Rydon?

1 A. I can't. This was produced without my knowledge or  
 2 consent.

3 Q. Yes.

4 Then we can see four previous projects that are  
 5 referred to under "Relevant project experience": we have  
 6 the Chalcots Estate project in Camden, the Ferrier Point  
 7 in Newham, the Wates Living Space in Little Venice and  
 8 the Buxton Group Castlemaine Tower, Wandsworth; do you  
 9 see that there?

10 A. Yes.

11 Q. Were you involved in all of those projects for Harley?

12 A. No.

13 Q. Which ones were you not involved in?

14 A. I wasn't involved in the Chalcots Estate job. That was  
 15 being worked on when I first joined the company, and it  
 16 was -- the Little Venice was the first job I worked on,  
 17 and then I wasn't involved with the Castlemaine Tower,  
 18 I don't believe. I can't even remember that one.

19 Q. Ferrier Point, were you involved in that one?

20 A. Yeah, I was involved in Ferrier Point.

21 Q. I see. So you weren't involved in the Chalcots Estate  
 22 project?

23 A. No.

24 Q. Did you work as design manager on the Ferrier Point  
 25 project?

1 A. I was responsible for detailing the fabrication details  
 2 for that project. I can't remember what my title was at  
 3 that point.

4 Q. Okay.

5 Now, we can see Ferrier Point involved a window  
 6 replacement and overcladding 23 storeys, that's what's  
 7 said here. You have just told us you were detailing the  
 8 fabrication drawings. Is that right?

9 A. Yes, that's correct.

10 Q. Who at Harley had design responsibility for the design  
 11 of the façade in relation to those works?

12 A. It would have been the people overseeing that, which  
 13 again would have been my line manager, Mark Stapley, and  
 14 Ray Bailey.

15 Q. Who from Rydon did you work with on that project? Do  
 16 you remember any particular individuals that you worked  
 17 with?

18 A. No.

19 Q. So I was going to ask you about the Chalcots Estate  
 20 project, but just to be clear, you didn't have any role  
 21 on that project; is that right?

22 A. I didn't have any role on that project.

23 Q. Did you know what the materials were that were used on  
 24 the Chalcots project for the façade?

25 A. I couldn't recount them. I know that they'd had some

1 issues with delaminated panels that came from one  
 2 supplier and they had to replace them with panels from  
 3 another supplier, but that was all I knew.  
 4 Q. Did you know what manufacturers had been involved in  
 5 terms of the cladding, the rainscreen cladding and the  
 6 insulation on that project?  
 7 A. No.  
 8 Q. Did you know that it was a Rockwool insulation that was  
 9 used?  
 10 A. No.  
 11 Q. And you didn't know that it was Reynobond panels?  
 12 A. No.  
 13 Q. Were you aware that a fire had occurred in a flat on the  
 14 17th floor of Taplow House on the night of  
 15 16 January 2012?  
 16 A. I can't discern whether I knew that then or whether  
 17 I know it now, I'm afraid.  
 18 Q. Okay. So you can't remember knowing that at the time?  
 19 A. No.  
 20 Q. Can we look at Harley's inspection report. This is at  
 21 {HAR000010169}. We can see that this was written just  
 22 very shortly after the fire. It says the date of the  
 23 incident was on Sunday 16th or Monday 17 January 2012,  
 24 and the date of this report is 17 January 2012. Do you  
 25 see that towards the top?

1 A. Yes.  
 2 Q. Then we've got various names here. We can see it's  
 3 written by Tim Lovell, we see that one line up from the  
 4 bottom of that section.  
 5 A. Yes.  
 6 Q. We can see that you are also part of the distribution  
 7 for this report. Do you see your name there at the  
 8 bottom of that list under "Distribution"?  
 9 A. Yes.  
 10 Q. Can you recall receiving this report about the fire at  
 11 Taplow House?  
 12 A. No, I can't.  
 13 Q. Do you think you were sent it and just have not  
 14 remembered or ...?  
 15 A. Because I wasn't involved in the project, I may have  
 16 been sent it and not looked at it because I wasn't  
 17 involved.  
 18 Q. So you have no memory of ever reading this report into  
 19 the fire?  
 20 A. No, not until I've seen it recently.  
 21 Q. If we turn to page 4 {HAR00010169/4} of this document,  
 22 the author in the middle of this page, I want to look at  
 23 the paragraph below this photograph, says there:  
 24 "It was evident that despite the fire and the amount  
 25 of flammable items in the flat such as paper etc the

1 fire breaks were still intact and prevented the fire  
 2 spreading between flats. The Harley designed fire break  
 3 system is visible, now the surrounding fabric has melted  
 4 under the extensive heat."  
 5 Do you see that there?  
 6 A. Yes.  
 7 Q. Do you recall ever reading that or anything similar --  
 8 A. No.  
 9 Q. -- about this fire?  
 10 Were you aware that the Harley designed firebreak  
 11 system was still intact and had prevented the fire  
 12 spreading between flats?  
 13 A. I can remember people saying about how the fire hadn't  
 14 spread, but I wasn't aware of why it hadn't spread.  
 15 Q. So you were never told anything about the configuration  
 16 of either firestopping or cavity barriers in that façade  
 17 that --  
 18 A. No.  
 19 Q. -- was relevant to that fire?  
 20 A. No.  
 21 Q. Now, this report referred to the fact that a further  
 22 survey would be carried out, and we have that further  
 23 survey report, it was done by abseil. If we can turn to  
 24 that, this is at {CEP000003223}. So this is a further  
 25 report that was recommended after that initial

1 inspection. Do you recall seeing this report at the  
 2 time you worked for Harley?  
 3 A. No, I don't believe I did.  
 4 Q. Now, we can see on page 2 {CEP000003223/2} of this that  
 5 it is dated -- we see the date of report, five lines  
 6 down -- 23 January 2012. Do you see that there?  
 7 A. Yes.  
 8 Q. Again, you're there on the distribution list. You're  
 9 the last name on that distribution, together with  
 10 Mark Stapley and Graham Hackley of Harley. Do you see  
 11 that there?  
 12 A. Yes.  
 13 Q. I want to look at what's said at the bottom of page 2,  
 14 if we can look at the paragraph at the bottom of that  
 15 page, in the second sentence, if we pick it up, it says:  
 16 "The severity of the fire completely destroyed the  
 17 living room window. However, the fire was contained  
 18 from spreading to over floors by the extensive fire  
 19 breaks located at the head and cill of each window."  
 20 Do you see that there?  
 21 A. Yes.  
 22 Q. Do you remember ever reading that or anything similar  
 23 while you were at Harley?  
 24 A. No, I think as before, because I wasn't involved in the  
 25 project, either I didn't receive it or didn't read it.

1 Q. So you don't recall being aware that firebreaks at both  
2 the head of the window and the cill of the window had  
3 played a role in terms of preventing fire spread?  
4 A. No.  
5 Q. Do you recall anybody discussing the importance of  
6 cavity barriers or firestopping around windows after  
7 this fire within Harley?  
8 A. No.  
9 Q. Do you recall anyone discussing the maintenance of  
10 compartmentation after this fire and what was necessary  
11 to maintain compartmentation in flats?  
12 A. No.  
13 Q. Okay.  
14 So is it right that, from your point of view, when  
15 Harley was designing the façade at Grenfell Tower, no  
16 consideration was given to the Taplow House fire and  
17 what had been learnt from that fire?  
18 A. Yeah. I didn't know about it, so I didn't feed it  
19 through. I don't think anyone else fed it through.  
20 Q. And would Kevin Lamb have been aware of this, as far as  
21 you were aware?  
22 A. Not as far as I was aware, no.  
23 Q. We can ask him later this week.  
24 Were you aware that Harley had used ACM cladding on  
25 high-rise buildings prior to the Grenfell Tower project?

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1 A. Yes, I was.  
2 Q. So you were aware that they had used ACM?  
3 A. Yes.  
4 Q. Were you aware of that from your work on Ferrier Point?  
5 A. And the Little Venice project.  
6 Q. Yes.  
7 Did you make any assumptions about how safe the  
8 Reynobond cladding was because it had been used on  
9 previous projects?  
10 A. I don't think I made any assumptions.  
11 Q. You didn't make any assumptions at all?  
12 A. No.  
13 Q. About fire performance?  
14 A. No. I was -- my role was as a structural engineer, so  
15 it wasn't within my remit.  
16 Q. Were you aware that Harley had used Rockwool as  
17 an insulation product on previous high-rise projects?  
18 A. Yes.  
19 Q. Did you ever apply your mind to the fire performance of  
20 Rockwool insulation prior to the Grenfell Tower project?  
21 A. No. Generally, if it was -- I think the only time that  
22 I would ever consider the fire performance would be if  
23 it was a performance specification, and we had been  
24 given a U-value rather than a product, then if the  
25 product that we came up with to hit the U-value, then

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1 those questions would be asked and it would be sent off  
2 to the project's fire consultant to consider whether  
3 that was usable. But it was always something that I put  
4 back up the chain, because I didn't know about fire at  
5 that point in my career.  
6 Q. I see. So, just to summarise, are you saying that the  
7 only performance aspect you were ever looking at in  
8 terms of these projects was the thermal performance?  
9 A. No, if it was -- there's prescriptive specifications  
10 where all the products are specified, the exact product,  
11 thickness, and then there's performance specifications  
12 where they will say that they want it to be a certain  
13 U-value, a certain fire rating, and you have to then go  
14 out into the market and find products that hit that.  
15 When you find a product, you then put it back to the  
16 team to be approved.  
17 So, if it was prescriptive, you would follow what  
18 they had already set, because it would have gone through  
19 the design process and been checked by all the  
20 consultants.  
21 Q. If it was a fire performance that you had to hit, are  
22 you saying it wasn't any part of your role to check that  
23 a particular product didn't meet that fire performance?  
24 A. If there was -- if the specification had a fire  
25 performance written in it, then we would try and find

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1 that fire performance.  
2 Q. Yes, but would you always seek external advice on that?  
3 A. Yes.  
4 Q. I see. Okay.  
5 Mr Wehrle for Arconic has given evidence that he had  
6 certain conversations with representatives of Rydon  
7 during the Chalcots Estate project. Do you recall ever  
8 meeting a Mr Wehrle of Arconic?  
9 A. I've never heard of Mr Wehrle.  
10 Q. Were you ever on site during the Chalcots project?  
11 I think you have told us you weren't involved; is that  
12 correct?  
13 A. No, I wasn't involved. I drove past it once with  
14 Tim Lovell who pointed at it and said that was the  
15 project, but that was it.  
16 Q. Did you ever hear anybody else within Harley discussing  
17 meeting a representative of Arconic on the Chalcots  
18 project?  
19 A. No.  
20 Q. Now, I want to consider in a little bit more detail your  
21 understanding of the regulatory requirements at the time  
22 of the Grenfell project.  
23 Were you familiar yourself with the requirements of  
24 the Building Regulations 2010 when you were working on  
25 the Grenfell project?

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1 A. No. I would have been mainly focused on Euro codes for  
2 structural engineering.  
3 Q. The Euro codes for structural engineering?  
4 A. (Witness nods).  
5 Q. Yes. Were you aware that there was a thing called the  
6 Building Regulations --  
7 A. Yes, I was.  
8 Q. -- that had to be complied with? You were aware of  
9 that.  
10 Were you aware that the Building Regulations  
11 contained functional requirements that had to be met?  
12 A. As far as structural engineering, I would have been  
13 aware of it, because the Euro codes are designed to  
14 satisfy those functional requirements.  
15 Q. Yes.  
16 Were you aware that there were functional  
17 requirements in terms of fire performance?  
18 A. I would have been able to logically deduce it. There  
19 were functional requirements for all parts of the  
20 building.  
21 Q. Were you aware that there was a part B in schedule 1 of  
22 the Building Regulations that was relating to  
23 fire safety?  
24 A. Yes, I was aware of it.  
25 Q. Were you aware that part B divided down into parts B1

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1 through to B5?  
2 A. No, I wasn't.  
3 Q. So had you heard of the B4 functional requirement in  
4 terms of a wall adequately resisting the spread of fire?  
5 A. Not at that time, no.  
6 Q. Can we just look at Approved Document B, this is at  
7 {CLG00000224}. This is the 2013 edition of Approved  
8 Document B on fire safety.  
9 I think before you said you weren't familiar with  
10 Approved Document B at the time of the Grenfell project;  
11 is that right?  
12 A. Yeah, not like I am now.  
13 Q. Had you looked at it at all at the time of the Grenfell  
14 project?  
15 A. I think I had probably been sent parts of it by  
16 consultants and manufacturers, but generally just to  
17 pass on.  
18 Q. Had you ever sat down and read any bits of it yourself?  
19 A. Not that I remember, no.  
20 Q. Did you know what the purpose was of this kind of  
21 practical guidance?  
22 A. Not at that time in my career, no. I mean, now I can  
23 look back on it and say that it is the same as Euro  
24 codes, it's a way of satisfying the  
25 Building Regulations, but at the time I was -- my focus

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1 was structural engineering, so I wouldn't have known  
2 that that was doing the same thing as the Euro codes.  
3 Q. Yes.  
4 Can we turn on to page 93 {CLG00000224/93} where we  
5 see B4, functional requirement B4 of schedule 1 of the  
6 Building Regulations. Do you see that there?  
7 A. Yes.  
8 Q. B4.(1):  
9 "The external walls of the building shall adequately  
10 resist the spread of fire over the walls and from one  
11 building to another, having regard to the height, use  
12 and position of the building."  
13 I just summarised that for you earlier and asked you  
14 if you are familiar with it, and I think you said no.  
15 Is that correct?  
16 A. Yes, that's correct.  
17 Q. Then if we turn on to page 95 {CLG00000224/95} of this,  
18 at paragraph 12.5 there is a section beginning,  
19 "External wall construction" at the bottom of that page.  
20 If we can just zoom in on that.  
21 So here there is a warning. It says this:  
22 "The external envelope of a building should not  
23 provide a medium for fire spread if it is likely to be a  
24 risk to health or safety. The use of combustible  
25 materials in the cladding system and extensive cavities

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1 may present such a risk in tall buildings."  
2 Do you see that there?  
3 A. Yes.  
4 Q. Now, were you aware of that warning at the time of the  
5 Grenfell project?  
6 A. No.  
7 Q. Were you aware in general terms that the use of  
8 combustible materials and extensive cavities may present  
9 a risk in tall buildings?  
10 A. I was aware that it was something that people were  
11 cautious of, and needed to be run by the consultants to  
12 make sure that whatever was being used complied.  
13 Q. I see.  
14 The next paragraph under 12.5 says this:  
15 "External walls should either meet the guidance  
16 given in paragraphs 12.6 to 12.9 or meet the performance  
17 criteria given in the BRE Report Fire performance of  
18 external thermal insulation for walls of multi storey  
19 buildings (BR 135) for cladding systems using full scale  
20 test data from BS 8414 ..."  
21 Do you see that there?  
22 A. Yes.  
23 Q. Were you aware at the time that there was guidance  
24 suggesting that external walls should either meet the  
25 guidance given in this document or meet the performance

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1 criteria in BR 135 with test data from 8414 testing?  
 2 A. I was aware that there was performance criteria that the  
 3 fire consultants worked to, but I wouldn't have been  
 4 able to say what it was.  
 5 Q. And you weren't aware of the difference between  
 6 following this guidance and having had a test carried  
 7 out on a cladding system?  
 8 A. No, I wasn't.  
 9 Q. So is it right that you can't tell us, when Harley was  
 10 doing its design work on the façade, whether anyone was  
 11 following the guidance in 12.6 to 12.9 or meeting the  
 12 performance criteria in BR 135?  
 13 A. I would have thought that we would be trying to follow  
 14 something, and then passing it back to see if it  
 15 complied, because I don't know -- I certainly didn't  
 16 know whether it complied or not.  
 17 Q. When you say, "I would have thought that we would be  
 18 trying to follow something", can you give us any  
 19 indication of what Harley might have been trying to  
 20 follow in its design work?  
 21 A. From past projects, we'd always followed what we'd  
 22 been -- what had been put in the prescriptive design and  
 23 then that had been signed off by the fire consultants,  
 24 so we probably would have been following that same  
 25 approach of taking the initial design, following it and

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1 then expecting it to be signed off by a fire consultant.  
 2 Q. Were you aware that in this guidance document there was  
 3 special guidance around buildings above 18 metres?  
 4 A. I knew that there was something special about buildings  
 5 above 18 metres, that there was a different criteria  
 6 that had to be met, but I wouldn't have been able to say  
 7 what that criteria was.  
 8 Q. Can we look at paragraph 12.6. It's at the bottom of  
 9 that page there. We have a heading "External surfaces",  
 10 do you see that there?  
 11 A. Yep.  
 12 Q. It says there, 12.6:  
 13 "The external surfaces of walls should meet the  
 14 provisions in Diagram 40."  
 15 Do you see that there?  
 16 A. Yes.  
 17 Q. If we can look at diagram 40, which is on page 97  
 18 {CLG00000224/97}, was that a diagram that you had ever  
 19 seen at the time you were working on the Grenfell  
 20 project?  
 21 A. Yes, I think suppliers had sent it to us before, but ...  
 22 Q. Did you know yourself how to interpret that in terms of  
 23 the guidance it was giving?  
 24 A. No.  
 25 Q. Did you know that for Grenfell it would be the bottom

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1 right-hand sketch there, "e. Any building", which would  
 2 be applicable?  
 3 A. I can't remember, but logically it looks like the right  
 4 one.  
 5 Q. Now, diagram 40 required something called national  
 6 class 0 or European class B-s3, d2 or better. We will  
 7 come back to national class 0 later, but the  
 8 class B-s3, d2, did you understand that at the time of  
 9 the Grenfell project?  
 10 A. No, until I did the degree with Bath, I wasn't aware of  
 11 the European classifications at all.  
 12 Q. Yes. So you wouldn't have known what the s3, d2 meant  
 13 either?  
 14 A. Not at that point, no.  
 15 Q. If we go to page 96 {CLG00000224/6} and look at  
 16 paragraph 12.7, it states there:  
 17 "In a building with a storey 18m or more above  
 18 ground level any insulation product, filler material  
 19 (not including gaskets, sealants and similar) etc. used  
 20 in the external wall construction should be of limited  
 21 combustibility ..."  
 22 Do you see that there?  
 23 A. Yes.  
 24 Q. Were you aware of that guidance more generally at the  
 25 time you were working on the Grenfell project?

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1 A. No.  
 2 Q. Had you ever heard of the phrase "limited  
 3 combustibility"?  
 4 A. Yes, I had. I thought -- I thought it was just the same  
 5 as like class 0 or 1, that it meant it didn't burn very  
 6 much.  
 7 Q. So did you appreciate that, within this guidance  
 8 document, there was a specific definition of limited  
 9 combustibility and what tests had to be undergone to  
 10 meet that phrase?  
 11 A. No, I didn't.  
 12 Q. So does it follow that you weren't aware that this  
 13 guidance required the insulation product to be of  
 14 limited combustibility?  
 15 A. No, not at that point, because I was just -- I was  
 16 responsible for the structural design, I wasn't educated  
 17 in this.  
 18 Q. Yes. Okay.  
 19 Now, in terms of other specialist guidance  
 20 documents, industry guidance at the time, had you heard  
 21 of the Building Control Alliance, the BCA?  
 22 A. I think that, yeah, I'd heard of it as the BCA.  
 23 I didn't know it stood for Building Control Alliance.  
 24 Q. Were you aware at the time of the Grenfell Tower project  
 25 that the BCA issued guidance documents for the

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1 construction industry?  
 2 A. Looking back on it now, I can remember people talking  
 3 about technical notes, but I didn't know who they were  
 4 issued by. Now I can connect the two together.  
 5 Q. If we can just look at, this is a piece of BCA guidance,  
 6 {CEP00057294}, and this is Technical Guidance Note 18,  
 7 "Use of combustible cladding materials on residential  
 8 buildings", dated June 2014. Do you see that there?  
 9 A. Yes.  
 10 Q. Now, at the time of the Grenfell project, were you  
 11 familiar with this document?  
 12 A. Looking back on it, I can remember people telling me  
 13 that they'd had desktop studies done for things, and on  
 14 other projects we sent desktop studies off to the fire  
 15 consultants to be cross-checked and approved or  
 16 rejected, but it's only looking back on it now that  
 17 I know that that came from this document.  
 18 Q. Did you read this document, do you think, at the time of  
 19 the Grenfell project?  
 20 A. I don't believe so.  
 21 Q. Now, we can see that you were sent this version of the  
 22 BCA guidance on 8 April 2015 by Jonathan Roome at  
 23 Celotex. If we could just pull that up, this is at  
 24 {CEL00003628}. Again, I'll come back to this email  
 25 later when we're talking about Celotex in more detail.

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1 What I want to note here is that, if you look at the  
 2 third paragraph of this email to you on 8 April 2015, he  
 3 says:  
 4 "I have attached the Building Control Guidance notes  
 5 for insulation products above 18m which seem to be doing  
 6 the rounds at the moment."  
 7 Do you see that there?  
 8 A. Yes.  
 9 Q. There was an attachment to this email which was the  
 10 guidance note I was just showing you.  
 11 Can you remember what you did with that guidance  
 12 when it was sent to you by Mr Roome?  
 13 A. No, I can't.  
 14 Q. Do you recall whether you passed it on to any other  
 15 Harley employees?  
 16 A. No, I can't.  
 17 Q. Or Kevin Lamb?  
 18 A. No.  
 19 Q. Or to Studio E?  
 20 A. No.  
 21 Q. Or Rydon?  
 22 A. No.  
 23 Q. Just to be clear, you weren't familiar with it before  
 24 this point; is that right?  
 25 A. No, I wasn't familiar with it. I can remember just that

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1 people used to talk about the desktop studies as a way  
 2 of getting something approved, and that we'd send them  
 3 on.  
 4 Q. Can we go back to that Technical Note 18, {CEP00057294}.  
 5 It tells us in the first paragraph under "Purpose" that:  
 6 "... technical guidance notes are for the benefit of  
 7 its members and the construction industry, to provide  
 8 information, promote good practice and encourage  
 9 consistency of interpretation for the benefit of our  
 10 clients."  
 11 Do you see that there?  
 12 A. Yes.  
 13 Q. "They are advisory in nature and in all cases the  
 14 responsibility for determining compliance with the  
 15 Building Regulations remains with the building control  
 16 body concerned."  
 17 Do you see that there?  
 18 A. Yes.  
 19 Q. If we then go down in this document under  
 20 "Introduction", it says there:  
 21 "Section 12 of Approved Document B2 gives guidance  
 22 on the acceptable use of combustible materials within  
 23 the external cladding system.  
 24 "Where a building exceeds 18m in height, AD B2  
 25 recommends (for the entire wall area both below and

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1 above 18m) either the use of materials of limited  
 2 combustibility for all key components or to submit  
 3 evidence that the complete proposed external cladding  
 4 system has been assessed according to the acceptance  
 5 criteria in BR135 ..."  
 6 Do you see that there?  
 7 A. Yes.  
 8 Q. Now, again, were you aware that there was guidance from  
 9 this Building Control body, the Building Control  
 10 Alliance, along those lines about using materials of  
 11 limited combustibility for all key components or  
 12 submitting evidence that the proposed external system  
 13 has been assessed according to BR 135? Were you aware  
 14 of that at the time?  
 15 A. No.  
 16 Q. So did you ever give any consideration to what materials  
 17 of limited combustibility for all key components meant?  
 18 A. No, I'd never read this, so I didn't.  
 19 Q. So even though you're sent it by a representative of  
 20 Celotex, you wouldn't have thought to read this?  
 21 A. I think we were getting a lot of pressure from Celotex  
 22 and a lot of sales material at that time. I can't  
 23 remember reading it.  
 24 Q. Now, under "Key issues", immediately below that, this  
 25 guidance says, if we read from the first bit:

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1 "Fire spread via the external wall medium is  
 2 exacerbated by the use of combustible materials and  
 3 extensive cavities."  
 4 Do you see that there?  
 5 A. Yes.  
 6 Q. That mirrors what we saw before in 12.5, do you  
 7 remember, of ADB, where it was highlighting the same  
 8 risks? Do you recall that, just a minute ago?  
 9 A. Yes.  
 10 Q. The guidance goes on:  
 11 "The speed by which a flame rises vertically up the  
 12 external face of a building leads to potentially rapid  
 13 fire spread from lower floors to higher ones. Within  
 14 the confines of a cavity, the flame will also elongate  
 15 up to ten times its length as it searches for oxygen."  
 16 Do you see that there?  
 17 A. Yes.  
 18 Q. Were those risks that you were generally aware of at the  
 19 time of the Grenfell project?  
 20 A. I don't think to this extent. I think at the time my  
 21 understanding was just that you could get unseen spread  
 22 of flame, so not that it would spread so high or so  
 23 quickly.  
 24 Q. Yes.  
 25 A. And then that's why you had to put in cavity barriers.

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1 Q. Yes.  
 2 A. To stop the unseen spread of fire.  
 3 Q. So it goes on:  
 4 "Hence, the need for robust cavity barriers,  
 5 restricted combustibility of key components and the use  
 6 of materials with a low spread of flame rating is  
 7 necessary, particularly given the delamination and  
 8 spalling nature of some of the components when heated."  
 9 Do you see that there?  
 10 A. Yes.  
 11 Q. Again, were you aware of all of that in general terms at  
 12 the time of the Grenfell project?  
 13 A. Not of the -- not of the delamination, spalling, no, and  
 14 the combustibility part I would have thought would have  
 15 been assessed before, you know, being sent out on  
 16 a particular project.  
 17 Q. Yes.  
 18 A. So when we received the materials to be used on  
 19 a project, I would have assumed that this work had been  
 20 checked previously.  
 21 Q. Yes.  
 22 Now, a little further down, if we pick up in the  
 23 third paragraph there under "Key issues", it says there:  
 24 "A Surface Spread of Flame Classification does not  
 25 infer any resistance to combustibility, it is solely a

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1 measure of the spread of a flame across the surface."  
 2 Do you see that?  
 3 A. Yes.  
 4 Q. Again, did you understand that at the time you were  
 5 working on the Grenfell project?  
 6 A. No, that wasn't something that I was -- as far as I'm  
 7 aware, I wasn't made aware of that until I went to  
 8 university.  
 9 Q. Did you understand that surface spread of flame  
 10 classifications might be referring to class 0 or  
 11 national class 0?  
 12 A. I just understood that class 0 meant that it wouldn't  
 13 catch fire.  
 14 Q. Okay.  
 15 Then there are some bullet points under that  
 16 paragraph, and it says this:  
 17 "Thermosetting insulants (rigid polyurethane foam  
 18 boards) do not meet the limited combustibility  
 19 requirements of AD B2 Table A7 and so should not be  
 20 accepted as meeting AD B2 paragraph 12.7."  
 21 Do you see that there?  
 22 A. Yeah.  
 23 Q. Again, were you aware at the time of the project that  
 24 thermosetting insulants didn't meet the limited  
 25 combustibility requirements and so should not be

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1 accepted as meeting parts of the ADB guidance?  
 2 A. No. I just wasn't looking at this kind of thing. I was  
 3 focused on fabrication and structural design.  
 4 Q. Were you aware that thermosetting insulants such as PIR,  
 5 polyisocyanurate foam or phenolic foam were not of  
 6 limited combustibility and therefore were only compliant  
 7 if included as part of a cladding system tested to  
 8 BR 135 and 8414?  
 9 A. No, I wasn't, for the same reasons mentioned before.  
 10 Q. Did you ever apply your mind to whether the insulation  
 11 at Grenfell Tower was of limited combustibility?  
 12 A. No.  
 13 Q. Did you ever seek any assurances that the insulation was  
 14 of limited combustibility?  
 15 A. No.  
 16 Q. Did you ever apply your mind to whether the insulation  
 17 at Grenfell Tower had been tested to BR 135 and BS 8414?  
 18 A. I don't -- don't remember, no.  
 19 Q. Were you aware that any such testing referred to the  
 20 complete assembly, and it referred to system testing, as  
 21 opposed to the testing of one component?  
 22 A. No.  
 23 Q. Finally, under this same section, there is a bullet  
 24 point there right at the very bottom. It says:  
 25 "The BR135/BS8414 tests deal solely with the spread

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1 of fire once it has entered the cavity. Hence, the  
2 requirements for cavity barriers in accordance with  
3 Section 9 of AD B2 are required in all cases including  
4 around openings in the façade.”

5 Do you see that there?

6 A. Yes.

7 Q. Were you aware that there was industry guidance at this  
8 time which specifically drew attention to the importance  
9 of including cavity barriers around openings in the  
10 façade?

11 A. No, I wasn't. I was aware that you needed cavity  
12 barriers, and on other projects that we'd been involved  
13 with, we drew elevations that showed where we were  
14 intending to put the cavity barriers, and they would be  
15 sent off to the consultant for them to approve or add  
16 additional ones where they thought they were necessary.

17 MS GRANGE: Okay, thank you.

18 Mr Chairman, I think that would be an appropriate  
19 moment for a break, thank you.

20 SIR MARTIN MOORE-BICK: Thank you.

21 Well, Mr Anketell-Jones, we will have a break now.  
22 We will take about quarter of an hour, and we will come  
23 back at 3.35.

24 While you are out of the room, please don't talk to  
25 anyone about your evidence or anything to do with it.

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1 All right?

2 THE WITNESS: Yes, sir.

3 SIR MARTIN MOORE-BICK: If you would like to go with the  
4 usher, she will look after you.

5 THE WITNESS: Thank you.

6 SIR MARTIN MOORE-BICK: Thank you very much.

7 (Pause)

8 Right, 3.35, please. Thank you.

9 (3.19 pm)

10 (A short break)

11 (3.35 pm)

12 SIR MARTIN MOORE-BICK: Right, ready to carry on?

13 THE WITNESS: Yes, sir.

14 SIR MARTIN MOORE-BICK: Thank you.

15 Yes, Ms Grange.

16 MS GRANGE: Thank you, Mr Anketell-Jones.

17 We were looking before we broke at the Building  
18 Control Alliance guidance from June 2014 that you were  
19 sent in April 2015 by Mr Roome; yes?

20 A. Yes.

21 Q. And I want to go back to that and look at page 2 of it,  
22 {CEP00057294/2}. We can see here that what it does is  
23 set out different options, three routes to compliance,  
24 with paragraph 12.7 of ADB. We have option 1, option 2  
25 and then at the bottom of the page option 3. Do you see

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1 that there?

2 A. Yes.

3 Q. Were you aware at the time of the Grenfell project that  
4 there were in general terms these different options for  
5 complying with the guidance to the Building Regulations?

6 A. I think the only one that I was aware of was the desktop  
7 studies by the fact that we'd submitted others on other  
8 projects to the fire consultants for approval.

9 Q. Were you aware of what that desktop study report was  
10 showing? What was that trying to demonstrate?

11 A. It was demonstrating that it was compliant by using fire  
12 engineering rather than testing.

13 Q. I see.

14 So option 1 was to use materials of limited  
15 combustibility for all elements of the cladding system  
16 above and below 18 metres; you see that there?

17 A. Yes.

18 Q. Option 2 was an acceptable alternative approach is to  
19 submit evidence that the complete proposed external  
20 cladding system has been assessed according to the  
21 BR 135 criteria by 8414 testing; do you see that there?

22 A. Yes.

23 Q. Then option 3 is the desktop study report from  
24 a suitably independent UKAS accredited body stating  
25 whether, in their opinion, the BR 135 criteria would be

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1 met with the proposed system. Do you see that there?

2 A. Yes.

3 Q. In general terms, were you aware of the distinction  
4 between system testing and the other route, which was  
5 about individual products being, for example, of limited  
6 combustibility? Were you aware of that distinction?

7 A. No.

8 Q. In respect of option 2, did you ever make any  
9 investigations as to whether a specific BS 8414 test had  
10 been done using the system specified for Grenfell?

11 A. No, because I wasn't involved in that part, I was  
12 involved in the structural design.

13 Q. In respect of option 3, did you or anyone else make any  
14 investigations as to whether a desktop study had been  
15 undertaken on the system that had been specified for  
16 Grenfell?

17 A. Not as far as I'm aware.

18 Q. So you're not aware of any desktop study being  
19 commissioned in respect of the Grenfell Tower project?

20 A. No.

21 Q. Do you recall taking any steps yourself to ensure that  
22 the system at Grenfell Tower satisfied one of these  
23 three options for demonstrating compliance?

24 A. No, because my responsibility was to do the structural  
25 design.

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1 Q. Whose responsibility was it within Harley to ensure that  
2 the cladding system satisfied one of these options for  
3 compliance?  
4 A. At that time, as we had no technical manager, it would  
5 have fallen to the senior designer -- to the senior  
6 management.  
7 Q. So who would that have been at the time in Harley?  
8 A. Would have been the directors, which would have been  
9 Mark Stapley and Ray Bailey, and Mark Harris.  
10 Q. Do you have a recollection of them actually considering  
11 the compliance of the Grenfell Tower system with  
12 relevant guidance at the time? Do you remember them  
13 doing that?  
14 A. No.  
15 Q. Did you ever raise the question of what route to  
16 compliance you were adopting with anyone at Harley?  
17 A. No, because I was just looking at the structural design.  
18 Q. Or anyone else on the project, Studio E or Rydon?  
19 A. No.  
20 Q. Can we look at your first main witness statement at  
21 paragraph 33, this is {HAR00010149/8}. You say there:  
22 "The version of Building Control Alliance's (BCA)  
23 Technical Guidance Note 18 available at the time (June  
24 2014 version) was also misleading and offered a way of  
25 circumnavigating the requirement of paragraph 12.7 of

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1 Approved Document B through Option 3. This third option  
2 allowed a 'desktop study' to be carried out ..."  
3 Do you see that there?  
4 A. Yes.  
5 Q. Can you just explain to us in what way this  
6 Technical Guidance Note 18 was misleading, in your view?  
7 A. I just -- from my knowledge now, I see it as open to  
8 interpretation. You would get different fire  
9 consultants comparing results from other tests, and  
10 making different conclusions from that, and to me that  
11 isn't clear enough. If two fire consultants can come up  
12 with different opinions, it's not clear and must be  
13 misleading.  
14 Q. You started that answer by saying, "From my knowledge  
15 now"; does that mean that, at the time of the Grenfell  
16 project, you didn't consider this guidance misleading?  
17 A. No, I didn't know about this guidance at that point.  
18 Q. You talk about it "offered a way of circumnavigating the  
19 requirement of paragraph 12.7 of Approved Document B",  
20 do you see that there?  
21 A. Yes.  
22 Q. Were you aware at the time of the Grenfell project of  
23 a culture of professionals circumnavigating some of the  
24 guidance in the approved documents?  
25 A. No.

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1 Q. So what direct experience do you have of that? You say,  
2 "offered a way of circumnavigating the requirement at  
3 paragraph 12.7". Do you say that you do have direct  
4 experience of that?  
5 A. Since leaving Harley I've got experience of different  
6 manufacturers trying to put forward products that they  
7 say they have desktop studies for, where they've quite  
8 often not been carried out by a UKAS body, and when they  
9 have been put forward to the fire consultants they've  
10 been rejected.  
11 Q. I see. But just to be clear, that wasn't something you  
12 were aware of at the time of the Grenfell project?  
13 A. No.  
14 Q. We were just looking at the June 2014 version of the BCA  
15 guidance; I would just now like to take you to a later  
16 edition of that same guidance from June 2015. This is  
17 at {CELO0002347}.  
18 Now, do you have any recollection of reading this  
19 further version of the guidance at the time you were  
20 involved in the Grenfell project?  
21 A. No.  
22 Q. On page 1, what we can see under "Key issues", if we go  
23 down that page and look at the bottom half of that page,  
24 in the third paragraph under "Key issues" we see the  
25 same sentence about a surface spread of flame

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1 classification not inferring any resistance to  
2 combustibility, and then in the first bullet point it  
3 talks about thermosetting insulants not usually meeting  
4 the limited combustibility requirements, but it gives  
5 more examples in the part in parenthesis, in brackets,  
6 in that first line. Do you see there it says:  
7 "... (e.g. rigid polyurethane, polyisocyanurate,  
8 polystyrene foam boards) ..."  
9 Do you see that there?  
10 A. Yes.  
11 Q. I want to ask you, I know you said you didn't read this  
12 guidance, but were you aware at the time of the Grenfell  
13 project that insulants such as polyisocyanurate, PIR,  
14 didn't meet certain requirements of ADB?  
15 A. No, I wasn't.  
16 Q. Were you aware that they should only be accepted as  
17 meeting paragraph 12.7 of ADB if they were included as  
18 part of a cladding system tested to BR 135 and BS 8414?  
19 A. No, I wasn't.  
20 Q. Were you aware of polyisocyanurate foam boards at the  
21 time of the Grenfell project?  
22 A. No.  
23 Q. So if you had been asked to name some manufacturers of  
24 PIR boards at the time, you wouldn't have been able to  
25 tell us?

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1 A. I don't believe so, no.  
 2 Q. Now, I now want to look at the CWCT. We talked about  
 3 them briefly, and I think you confirmed that Harley was  
 4 a member of the CWCT at the time of the Grenfell  
 5 project; that's right, isn't it?  
 6 A. Yeah, I believe so. It was ... I think the membership  
 7 was dealt with by Mark Stapley and Graham Hackley.  
 8 Q. Yes.  
 9 Now, can we look at a document. This is  
 10 {CEL00009876}, and we will need the offline version to  
 11 be able to see it clearly.  
 12 Now, we're going to come back to this in the context  
 13 of looking more carefully at the insulation, but for  
 14 now, this is an entry from the Celotex Salesforce  
 15 database. It's not very easy to read, but in the top  
 16 right it relates to something called Merit House, and,  
 17 if you look on the right-hand side at the top, we can  
 18 see "Related To: Merit House", and then underneath it  
 19 says "Name: Daniel Anketell-Jones". Can you see that?  
 20 A. Yeah.  
 21 Q. Under the comments, you can see there it says, "Met Dan  
 22 at the CWCT Members Meeting". Do you see that there?  
 23 A. Yes.  
 24 Q. This appears to be an entry from around October 2014.  
 25 Well, it says last modified by Mark Willoughby on

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1 13 October 2014, I think, in the bottom right-hand  
 2 corner.  
 3 Do you remember attending a CWCT members' meeting in  
 4 October 2014?  
 5 A. I don't remember.  
 6 Q. Do you ever remember meeting a representative of Celotex  
 7 at a CWCT members' meeting?  
 8 A. No, I don't remember.  
 9 Q. Can you help us as to what occurred at the members'  
 10 meetings?  
 11 A. We used to go to talks, I can't remember if they were  
 12 CWCT or by other either product suppliers or just sort  
 13 of general talks, but I wouldn't know what this one was  
 14 about.  
 15 Q. Were you aware at the time of the Grenfell project that  
 16 Harley had access to the benefits of CWCT membership,  
 17 including updates on technical training, publications  
 18 and certification work?  
 19 A. I think until I sort of was asked to consider training  
 20 into the technical role, I was primarily concerned with  
 21 structural issues, so I don't remember much about the  
 22 CWCT at that point.  
 23 Q. I see. But you wouldn't have been talking to  
 24 representatives of Celotex about structural issues,  
 25 would you?

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1 A. No.  
 2 Q. Do you have any recollection of speaking to  
 3 representatives of Celotex at CWCT members' meetings?  
 4 A. No, I don't.  
 5 Q. Were you personally aware at this time that there were  
 6 guidance notes produced by the CWCT?  
 7 A. I can't honestly remember at what point I became aware  
 8 of them.  
 9 Q. Let's have a look at a document. This is {CWCT0000019}.  
 10 So this is a document that we know was produced in  
 11 March 2011, and it's entitled "Technical Note 73, Fire  
 12 performance of curtain walls and rainscreens". Do you  
 13 see that there?  
 14 A. Yes.  
 15 Q. Is this familiar to you? Had you seen this by the time  
 16 you worked on the Grenfell project?  
 17 A. It's familiar to me now. I can't remember when it would  
 18 have become familiar to me. I think that because I was  
 19 primarily focused on structural stuff before becoming --  
 20 you know, being put forward for doing the MSc, I think  
 21 it wouldn't have been until sort of the end of 2015 or  
 22 something before I started appreciating that these  
 23 documents existed.  
 24 Q. Right.  
 25 Now, if we look at the top of the -- sorry, no, if

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1 we look at the bottom of page 1 and over to page 2  
 2 {CWCT0000019/2}, this guidance begins to draw attention  
 3 to different descriptions and classifications of  
 4 materials under the Building Regulations. If we can go  
 5 right down to the bottom of this page.  
 6 (Pause)  
 7 I can see it peeping out at the bottom, it's a text  
 8 beginning:  
 9 "In England, Wales and Northern Ireland ..."  
 10 That's the bit I want to look at. There we go. So  
 11 it begins here:  
 12 "In England, Wales and Northern Ireland, materials  
 13 may be described as non-combustible, of limited  
 14 combustibility or Class 0 using definitions given in  
 15 AD B."  
 16 Do you see that there?  
 17 A. Yes.  
 18 Q. Then it says:  
 19 "Materials may also be classified as Class 1, 2, 3  
 20 or 4 in accordance with BS 476 Parts 6 and 7."  
 21 Then it says:  
 22 "Equivalent European classifications are also used."  
 23 Did you have any understanding at the time of the  
 24 Grenfell project of the difference between  
 25 non-combustible, limited combustibility and class 0

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1 materials?  
 2 A. No, I didn't.  
 3 Q. Were you aware of a distinction between class 0 and  
 4 limited combustibility?  
 5 A. No.  
 6 Q. Now, can we look at paragraph 27 of your witness  
 7 statement at this point. This is {HAR00010149/6}. So  
 8 you say this:  
 9 "At the time of the refurbishment the main source of  
 10 guidance was (and still is) Approved Document B which is  
 11 a document produced by the government. The requirement  
 12 under Approved Document B is that the external surfaces  
 13 of materials used on a building over 18 metres are  
 14 Class 0 and therefore the relevant British Standard  
 15 would be BS476. Also, any insulation product used in  
 16 the external wall construction should be of limited  
 17 combustibility."  
 18 Now, do you see that there?  
 19 A. Yes.  
 20 Q. So that's the evidence you're giving us in your witness  
 21 statement.  
 22 Can we just go back and see what question you're  
 23 answering there. So we're asking you:  
 24 "Was the exterior ... compliant with relevant  
 25 building regulations, fire regulations ..."

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1 Et cetera.  
 2 Do we take it from that that what you are telling us  
 3 is what you know now and not what you knew at the time  
 4 of the project?  
 5 A. No, this is learning it from the fire and acoustics  
 6 course that you mentioned before, and also having  
 7 actually used that knowledge since in practice.  
 8 Q. Do you agree with me that you don't tell us in your  
 9 witness statement that you didn't know that at the time?  
 10 A. No.  
 11 Q. Can we look at paragraph 28 which follows this paragraph  
 12 of your witness statement, so over on to page 7  
 13 {HAR00010149/7}. So you say there:  
 14 "In terms of industry practice, at the time it was  
 15 generally considered that as long as all of the  
 16 components, in particular the cladding and insulation,  
 17 were described as Class 0 in manufacturers' literature  
 18 and third-party certifications, then this met the  
 19 requirements of Approved Document B and was therefore  
 20 compliant. There are many buildings across the UK that  
 21 have been clad in exactly the same way, as the  
 22 Government's own figures show."  
 23 Do you see that there?  
 24 A. Yes.  
 25 Q. You are saying there that was industry practice at the

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1 time, you say that in the first line; was that your  
 2 understanding at the time of the Grenfell project?  
 3 A. No, it wasn't my understanding at the time. I was  
 4 focused on structural design and fabrication detailing,  
 5 and this is my take on it, having spoken to other people  
 6 in the industry and seen what has been put on buildings,  
 7 you know, in the last ten years.  
 8 Q. I thought you told us earlier today that you were aware  
 9 of class 0 at the time.  
 10 A. Yeah, I was aware of class 0, it was just not in this  
 11 arrangement. So -- because here I'm saying that -- of  
 12 what the industry practice was, it's looking backwards.  
 13 Q. Yes. But was it your understanding at the time that as  
 14 long as all of the components were described as class 0  
 15 in manufacturers' literature and third-party  
 16 certifications, then this met the requirement of  
 17 Approved Document B and was compliant? Was that your  
 18 understanding at the time?  
 19 A. I don't think I had an understanding at the time.  
 20 I think because I was focused on structural design and  
 21 fabrication design, I always deferred to the fire  
 22 consultant for advice.  
 23 Q. Are you saying that you never applied your mind at all  
 24 through the Grenfell project to what the classification  
 25 was of, for example, the insulation?

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1 A. No, because I wasn't looking at the insulation. I was  
 2 looking at the structural design of the bracketry and  
 3 the systems that held it on.  
 4 Q. So you never thought about that at all?  
 5 A. No.  
 6 Q. Okay.  
 7 So when you talk about industry practice at the  
 8 time, who exactly are you referring to there? Are you  
 9 talking about cladding subcontractors, architects, fire  
 10 engineers, Building Control? Can you help us as to what  
 11 you mean by that?  
 12 A. I'm talking about the whole building industry.  
 13 Q. Does that mean it incorporates all of the bodies I was  
 14 just mentioning?  
 15 A. Yes.  
 16 Q. So cladding subcontractors thought that at the time?  
 17 A. Yes.  
 18 Q. Architects thought that at the time?  
 19 A. Yeah. I'm not saying all of them, but a lot of them.  
 20 Q. Yes.  
 21 Did you or anyone else at Harley ever challenge that  
 22 industry practice? Do you remember anyone saying,  
 23 "Well, actually, class 0 is not enough for the  
 24 components, we need to look deeper than that"?  
 25 A. I'm not aware of anyone at Harley doing that, no.

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1 Q. Now, if we return to that CWCT Technical Note on page 2,  
2 so this is {CWCT0000019/2}, it goes on on that left-hand  
3 column, if we look at the bottom of the page, please,  
4 under "Definitions", it gives definitions of a firestop  
5 there:  
6 "A seal provided to close an imperfection of fit or  
7 design tolerance between elements or components to  
8 restrict the passage of fire and smoke."  
9 Do you see that there?  
10 A. Yes.  
11 Q. Then it talks about the difference between integrity and  
12 insulation.  
13 At the top of the next column, on the right, then we  
14 get the definition of a cavity barrier:  
15 "A construction to close a concealed space against  
16 penetration or spread of smoke or flame."  
17 Do you see that there?  
18 A. Yes.  
19 Q. Now, were you aware at the time of working on the  
20 Grenfell project that there was a distinction drawn in  
21 industry guidance and other practical guidance between  
22 firestopping and cavity barriers?  
23 A. I think at that time I was just aware of firebreaks,  
24 which encompassed both of them, and that you would need  
25 to put different ones on depending on what you were told

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1 by the fire consultant.  
2 Q. So if I had asked you at the time: do you know what the  
3 difference is between a firestop and a cavity barrier,  
4 what would you have said?  
5 A. I wouldn't have known the difference between the two.  
6 Q. Now, moving on to page 4 {CWCT0000019/4} of this  
7 guidance, under the heading "Cavity barriers in  
8 rainscreen construction", which is in the bottom  
9 right-hand column, there we go, there there's  
10 a paragraph that reads:  
11 "Fire and smoke spread in rainscreen cavities is  
12 particularly dangerous as it may be more rapid than on  
13 the outside face of the cladding, due to the creation of  
14 a flue, and it may be undetected by building users or  
15 firefighters. It is therefore often necessary to  
16 incorporate cavity barriers in rainscreen cavities to  
17 limit the spread of fire and smoke."  
18 Do you see that there?  
19 A. Yes.  
20 Q. Were you aware at the time that fire and smoke spread in  
21 rainscreen cavities is particularly dangerous?  
22 A. I was aware that it could spread behind a rainscreen,  
23 and I was -- I thought that it just needed to be stopped  
24 so that the firefighters could tackle the actual fire.  
25 Q. What was your understanding as to the role of cavity

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1 barriers within a rainscreen cavity?  
2 A. To stop that spread of fire where it could go without  
3 the firemen being able to see where it was going.  
4 Q. Was that within the cavity itself in the outside wall,  
5 or were you also aware that cavity barriers were  
6 required to stop the fire breaking out and into the  
7 rainscreen cavity?  
8 A. I was aware that they were required. I think from other  
9 projects, we'd, like I said before, created elevations  
10 showing where they were going to go, and the fire  
11 consultant would usually draw on where you needed  
12 additional ones.  
13 Q. Yes.  
14 A. But I didn't understand where they were required.  
15 Q. Yes.  
16 Now, this note goes on to say, under "Regulations",  
17 there we have it, at the bottom of page 4:  
18 "For rainscreen walls, AD B requires that cavity  
19 barriers are provided ..."  
20 Then if we go over to page 5 {CWCT0000019/5}, we see  
21 there a bullet point at the top that says:  
22 "To close the edges of cavities including around  
23 window openings."  
24 Do you see that there?  
25 A. Yes.

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1 Q. Were you aware at the time that there was specific  
2 industry guidance that emphasised the importance of  
3 closing the edges of cavities, including around window  
4 openings?  
5 A. No.  
6 Q. Did you know in general terms that window openings had  
7 to be protected in terms of the spread of fire on your  
8 projects?  
9 A. No.  
10 Q. Then we can see at page 6 {CWCT0000019/6}, if we go to  
11 page 6 and look under the heading "Use of combustible  
12 material" on that left-hand column, we see in the second  
13 paragraph it says:  
14 "To satisfy the recommendations in AD B, insulation  
15 and filler materials in walls of a building with a floor  
16 more than 18m above ground level are required to be of  
17 limited combustibility."  
18 Do you see that there?  
19 A. Yes.  
20 Q. Just to be clear, you weren't aware of that guidance at  
21 the time of the Grenfell project; is that right?  
22 A. No, because I was focused on structural design, and  
23 these things I would always pass on to the fire  
24 consultant because I wasn't trained in it.  
25 Q. The guidance further down that column, if we look at the

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1 bottom of that page, if we look at the paragraph that's  
 2 just above the heading "Alternative approaches", it says  
 3 there:  
 4 "The only commonly used insulation material that  
 5 will satisfy the definition of limited combustibility is  
 6 mineral wool."  
 7 Do you see that there?  
 8 A. Yes.  
 9 Q. Again, were you aware at the time of the Grenfell  
 10 project that the only commonly used insulation which  
 11 satisfied the definition of limited combustibility was  
 12 mineral wool?  
 13 A. No.  
 14 Q. Were you aware in general terms that mineral wool was  
 15 the safest type of insulation to use in terms of fire  
 16 performance?  
 17 A. I can remember at the time there was lots of talk about  
 18 other insulations, but I didn't aware -- wasn't aware  
 19 that -- and that they weren't approved for over  
 20 18 metres, but I didn't realise that mineral wool was  
 21 the only one that was.  
 22 Q. So you remember at the time there was lots of talk about  
 23 other insulations, and that they weren't approved for  
 24 over 18 metres. Can you remember what kind of  
 25 insulations you are talking about there?

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1 A. No. I just remember that it was always something that  
 2 you needed to get signed off by the fire consultant.  
 3 Q. I see.  
 4 Now, can I ask you to look again at page 6 of this  
 5 guidance, and at the bottom is the heading "Alternative  
 6 approaches", and then at the top of the right-hand  
 7 column, if we go back to the top of the page, it says  
 8 this:  
 9 "Where testing is carried out in accordance with  
 10 BS 8414, the test applies to the complete cladding  
 11 system including insulation, rainscreen, flashings and  
 12 cavity barriers. Changing any of these components may  
 13 affect the ability of the wall to resist the spread of  
 14 fire."  
 15 Now, is that something that you were generally aware  
 16 of at the time?  
 17 A. No, I wasn't aware that you had to do a -- yeah,  
 18 I wasn't aware of that.  
 19 Q. So you weren't aware that the test would apply only to  
 20 the complete system, including all those details that  
 21 were tested, and that changing any of that system might  
 22 affect the ability of the wall to resist the spread of  
 23 fire? You were not aware of that?  
 24 A. I don't think I was even aware there was a test. On  
 25 other projects, I'd always just submit the drawings and

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1 the material datasheets to the fire consultant for  
 2 approval.  
 3 Q. But we looked earlier, and we will come back to it  
 4 again, at the email you sent to Mr Roome in 2015 where  
 5 you're asking about the BS 8414 test. So when you say,  
 6 "I wasn't aware there was even a test", can you explain  
 7 that?  
 8 A. It was just something so outside of what I did in  
 9 structural engineering that if it was requested by  
 10 a client or fire consultant, you pretty much copy and  
 11 pasted what they were asking for because they knew what  
 12 they were asking for.  
 13 Q. So you weren't aware, even in general terms, that there  
 14 was something that was a system test for fire?  
 15 A. It's hard to separate out what I know now, having done  
 16 the degree and practised it, between what I knew then.  
 17 Q. Okay.  
 18 Can we look at paragraph 30 of your witness  
 19 statement, this is {HAR00010149/7}. You're asked the  
 20 question:  
 21 "To the extent that it was compliant with such  
 22 regulations, legislation, British Standards, guidance  
 23 etc. were any of those inadequate and if so in what  
 24 respects, so far as relevant to the nature and immediate  
 25 causes of the fire and its spread?"

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1 Then you say this:  
 2 "With hindsight I believe that the guidance and the  
 3 legislation is absolutely not adequate. As far as I am  
 4 aware there was no guidance from any official bodies  
 5 such as the Centre for Window and Cladding Technology  
 6 (CWCT) and the Society of Façade Engineers (SFE) that  
 7 these materials should be avoided. It is still  
 8 impossible for either the CWCT or the SFE to offer any  
 9 guidance as the Government has still not made the  
 10 necessary changes."  
 11 Now, focusing on that first part, you say, "As far  
 12 as I am aware there was no guidance from any official  
 13 bodies such as the CWCT", but do you agree, given what  
 14 we've just looked at, that guidance was available from  
 15 the CWCT regarding the risks associated with combustible  
 16 materials, including PIR, polyisocyanurate, insulation?  
 17 A. Yeah. What I mean is that they just should not be  
 18 allowed. Anything, you know, with a B rating or worse  
 19 just should not be allowed over 18 metres.  
 20 Q. They should have been banned, is that what you're  
 21 saying?  
 22 A. Yeah.  
 23 Q. But would you agree with me that there was guidance  
 24 warning about the risks associated with combustible  
 25 material, including PIR insulation?

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1 A. I just don't think it was -- looking back on it now,  
 2 I don't believe it was strong enough. I think the  
 3 guidance, you know, allowed for a way to -- you know,  
 4 for it to be signed off or approved, and I just don't --  
 5 looking at it now, with the experience that I have and  
 6 the education I have, I don't think that it should be  
 7 put on buildings.

8 Q. Just to be clear, I think you have said you didn't read  
 9 the CWCT guidance from March 2011; is that correct?

10 A. Back then, no, I hadn't read it.

11 Q. And you didn't read the Building Control Alliance  
 12 guidance in June 2014 or June 2015?

13 A. No.

14 Q. Can you help us as to why you weren't aware of that CWCT  
 15 guidance when Harley was a member of the CWCT?

16 A. For me, I was looking at structural design and not  
 17 façade design, so I wouldn't have been sent these sort  
 18 of things. They weren't circulated, as far as I'm  
 19 aware. They would have come in to Graham Hackley or  
 20 Mark Stapley.

21 Q. We will see later, and I'll take you through it in  
 22 detail, that you had a lot of dealings with Celotex  
 23 during the project. Why were you having those dealings  
 24 with Celotex if none of this was part of your remit and  
 25 it was all Mark Stapley and Graham Hackley's remit?

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1 A. Because in the Celotex's rep's previous role, he had  
 2 been dealing with me on structural issues with the  
 3 company that he had worked with before and we had formed  
 4 a relationship, so he used to come in and sit down and  
 5 talk about things. But generally I didn't have the  
 6 background or the training to talk about fire-related  
 7 matters or anything else to do with façade engineering  
 8 apart from the structural side at that point. So, as  
 9 with the other things, I would pass anything that  
 10 I didn't know about through to, you know, the relevant  
 11 consultants who did.

12 Q. Graham Hackley had left Harley by the time of the  
 13 Grenfell project, hadn't he?

14 A. Yeah.

15 Q. So in terms of Mark Stapley, we aren't aware of any  
 16 communications where you say to Mark Stapley, "I don't  
 17 have this experience, I don't have this expertise on  
 18 fire, please can you help me". We don't see that, do  
 19 we, in your email communications?

20 A. No.

21 Q. Do you recall ever sending such emails to Mr Stapley?

22 A. No, but they were fully aware of what my area of  
 23 expertise were.

24 Q. I see.

25 Now, I want to ask you briefly about Harley's

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1 contractual duties on the Grenfell Tower project, just  
 2 briefly.

3 Did you yourself read the letter of intent and  
 4 appendices that were sent to Harley by Rydon and which  
 5 formed part of the relationship between the two  
 6 companies?

7 A. No.

8 Q. As design manager, was it important for you to  
 9 understand the nature of your contractual  
 10 responsibilities to ensure that Harley's work complied  
 11 with them?

12 A. My responsibilities as design manager were to make sure  
 13 that the designers were working to programme, and so the  
 14 parts that would have been relevant would have been the  
 15 programme. I wouldn't have read the contract.

16 Q. Did you understand that Harley was responsibility for  
 17 ensuring that the design of the façade was compliant  
 18 with the relevant compliances and statutory  
 19 requirements, which would include the  
 20 Building Regulations?

21 A. No, I didn't.

22 Q. Does that mean you positively thought it was somebody  
 23 else's responsibility, not Harley's, to be ensuring  
 24 compliance of the façade design with the  
 25 Building Regulations?

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1 A. I think my understanding at the time on all projects was  
 2 that it wasn't Harley's responsibility, that you put  
 3 forward your designs to the design team and  
 4 Building Control, who would check it and confirm whether  
 5 it was compliant or not.

6 Q. Did you ever check that assumption with anybody? Did  
 7 you ever say, "Can I just check, are we responsible for  
 8 making sure this complies with the  
 9 Building Regulations"?

10 A. Never checked that, but I did -- on other projects that  
 11 I worked on, I would check that it had been approved.

12 Q. Were you aware that some of the subcontract conditions  
 13 that were imposed in the contract with Rydon required  
 14 Harley to notify Rydon if there were any discrepancies  
 15 between the design of the work shown in the employer's  
 16 requirements and the statutory requirements, including  
 17 in the Building Regulations?

18 A. No, I wasn't aware of that.

19 Q. Were you aware that, as the specialist subcontractor,  
 20 you ought to warn either the main contractor or the lead  
 21 designer, Studio E, if there was a deficiency in the  
 22 design in terms of compliance with the  
 23 Building Regulations?

24 A. No, I wasn't aware of that.

25 Q. Were you aware that it was part of Harley's role to

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1 check whether the products that had been proposed in the  
 2 employer's requirements, including the  
 3 NBS specification, were compliant with the  
 4 Building Regulations and associated guidance?  
 5 A. No, I wasn't aware of that.  
 6 Q. Were you ever made aware of any concerns at the time  
 7 being raised about whether the design was compliant with  
 8 the relevant regulatory requirements, including the  
 9 Building Regulations?  
 10 A. No, I wasn't.  
 11 Q. Did you understand that the conditions that were imposed  
 12 by Rydon on Harley included a liability for design work  
 13 to the standard of an architect or other appropriate  
 14 professional designer holding themselves out as  
 15 competent to do the work?  
 16 A. Sorry, I don't understand the question.  
 17 Q. Sorry, it was a long question.  
 18 Did you understand that the conditions that were  
 19 imposed by Rydon on Harley included a liability for  
 20 design work to the standard of an architect or other  
 21 appropriate professional designer holding themselves out  
 22 as competent to do the work?  
 23 A. Sorry, can you summarise that in a way that --  
 24 I literally --  
 25 Q. Were you aware that Harley's work had to meet the

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1 standard of an architect's work in terms of the façade  
 2 design?  
 3 A. No, I wasn't.  
 4 Q. Or had to meet the standard of another appropriate  
 5 professional designer holding themselves out as  
 6 competent to do the façade design?  
 7 A. No.  
 8 Q. Did you understand that the provisions of the main  
 9 contract between the TMO and Rydon were incorporated  
 10 into Harley's subcontract insofar as they related to the  
 11 design of the façade?  
 12 A. No.  
 13 Q. Did you understand that the intention of the subcontract  
 14 was that Harley should take on the design  
 15 responsibilities in relation to the external cladding  
 16 works that Rydon had undertaken to the TMO under the  
 17 design and build contract?  
 18 A. Sorry, that's another long one.  
 19 Q. Yes, sorry.  
 20 Did you understand that the intention of the  
 21 subcontract was that Harley would take on the design  
 22 responsibilities in relation to the external cladding  
 23 work that Rydon had undertaken to the TMO? So in  
 24 effect, did you understand that you were sitting in  
 25 Rydon's shoes so far as it concerned the design of the

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1 cladding and the external wall?  
 2 A. No.  
 3 Q. Did you ever take the opportunity to inspect the main  
 4 Rydon building contract?  
 5 A. No.  
 6 Q. Now, we know that this was a JCT design and build  
 7 contract, that's Rydon's contract was design and build.  
 8 How familiar were you with design and build projects?  
 9 A. From a contracts point of view or in general?  
 10 Q. From a projects point of view. How many of the projects  
 11 that you'd been involved in were design and build?  
 12 A. I think, for my part, I never had any dealings with  
 13 contract at all, and so probably at that point in my  
 14 career wouldn't have been aware of what contracts were  
 15 design and build or weren't design and build.  
 16 Q. You wouldn't have been aware of what was meant by design  
 17 and build?  
 18 A. I don't think so, no.  
 19 Q. Did you understand at the time you were working for  
 20 Harley on the project that the architect and other  
 21 design consultants were not retained by the TMO through  
 22 to completion of the construction and handover of the  
 23 building?  
 24 A. No.  
 25 Q. Did you understand that Rydon had taken on

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1 responsibility for the entire design and construction of  
 2 the works?  
 3 A. No.  
 4 Q. Did you understand that because Rydon would not have  
 5 itself expertise to design and construct every element  
 6 of the works, it would appoint specialist subcontractors  
 7 for particular elements?  
 8 A. No.  
 9 Q. And that those subcontractors would be liable for the  
 10 design and construction of that particular element of  
 11 the works, did you understand that?  
 12 A. No.  
 13 Q. Were you aware whether Rydon had in place a process to  
 14 supervise the quality of the work that Harley was doing  
 15 on the project?  
 16 A. Quality of the install or quality of the design or  
 17 everything?  
 18 Q. Quality of the design, really, is what I'm thinking of.  
 19 A. My understanding at that point would have been that they  
 20 would pass the information that we sent them through to  
 21 their design team to approve, and that would have been  
 22 how they maintained the quality.  
 23 Q. I see. So you weren't ever made aware of Rydon  
 24 independently checking or --  
 25 A. No.

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1 Q. -- looking at the design?  
 2 A. No.  
 3 Q. Was it your understanding that Harley's subcontract with  
 4 Rydon required it to consider the NBS specification,  
 5 which had been part of the employer's requirements?  
 6 A. I wouldn't have known that that was in the contract, but  
 7 I knew that it was -- on every job we're given the  
 8 specification. I knew that on this job it was an NBS  
 9 specification.  
 10 Q. We will come and look at the NBS specification later,  
 11 but were you aware in general terms that there was  
 12 something called the NBS specification on this project,  
 13 the Grenfell project?  
 14 A. Yes.  
 15 Q. Were you aware that Harley's work had to comply with  
 16 a specification produced by Curtins Consulting, which  
 17 was entitled "Structural performance specification for  
 18 the design, supply and application of overcladding  
 19 systems to Grenfell Tower"?  
 20 A. No, I thought the only one we had to comply with was the  
 21 NBS specification.  
 22 Q. Can we just look at that Curtins Consulting document,  
 23 {ART00000914}. So does this help in any way? You  
 24 didn't think you had seen this specification. Now you  
 25 can see this front page, does that trigger any

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1 recollection of seeing this at the time?  
 2 A. No, I can't remember ever seeing this before.  
 3 Q. I just want to have a look at a couple of items in here.  
 4 If we go to section 6 on page 9 {ART00000914/9}, we can  
 5 see that the contractor is expressly required to  
 6 consider, and then just at the bottom of that page, can  
 7 you see three items up it says, "The need for effective  
 8 fire barriers". Do you see that there?  
 9 A. Yes.  
 10 Q. Were you aware that that was part of Harley's  
 11 responsibility to consider the need for effective  
 12 fire barriers?  
 13 A. We would have known that we needed to put fire barriers  
 14 in, we just wouldn't have known necessarily where they  
 15 needed to go. We've relied on the fire consultant to  
 16 tell us, as with other projects I had worked on.  
 17 Q. If we look on at page 11 {ART00000914/11} of this  
 18 specification, at item 7.1.13, we see there it says  
 19 this:  
 20 "The system should comply fully with the  
 21 recommendations of the BRE document 'Fire Performance of  
 22 External Thermal Insulation for Walls of Multi Storey  
 23 Buildings', second edition, 2003."  
 24 Do you see that there?  
 25 A. Yes.

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1 Q. And also it says in the paragraph below that, 7.1.14:  
 2 "The system shall not be a fire risk at any stage of  
 3 installation, nor shall it constitute a fire hazard  
 4 after completion if for any reason the insulant becomes  
 5 exposed."  
 6 Do you see that there?  
 7 A. Yes.  
 8 Q. Now, looking back at 7.1.13 and that BRE document, were  
 9 you familiar at the time with that BRE publication,  
 10 BR 135?  
 11 A. No.  
 12 Q. Let's just turn to that. This is at {BRE00005554/2}, we  
 13 see the front page of it. This is the second edition of  
 14 that document. It was dated 2003.  
 15 Again, just by looking at that, can you recollect  
 16 whether you ever saw that at the time of the Grenfell  
 17 project?  
 18 A. No, I only became aware of this document when I went to  
 19 Bath for the MSc.  
 20 Q. So you wouldn't have been aware of any of the guidance  
 21 in this document about the risks posed by external  
 22 thermal insulation in walls in multistorey buildings?  
 23 A. No, I wasn't taught it until I'd left the company.  
 24 MS GRANGE: Can we just look at a couple of bits of this  
 25 guidance.

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1 Mr Chairman, I would quite like just to finish this  
 2 topic, if that's okay. I can do that within the next  
 3 five minutes.  
 4 SIR MARTIN MOORE-BICK: Well, if you can do it within  
 5 five minutes, of course, that's fine.  
 6 MS GRANGE: Thank you.  
 7 On page 7 {BRE00005554/7} there is a reference to  
 8 and a picture from the Garnock Court fire in Irvine,  
 9 which is a fire in a multistorey building. You can see  
 10 there is a discussion of that there, and then there is  
 11 a picture below that.  
 12 Do you ever remember seeing anything about the  
 13 Garnock Court fire in Irvine at the time of the Grenfell  
 14 project?  
 15 A. No, I don't.  
 16 Q. Can I look at pages 17 {BRE00005554/17} and 18  
 17 {BRE00005554/18}, under the heading at the bottom of 17  
 18 "External panel", "Non-combustible materials and  
 19 materials of limited combustibility", do you see that  
 20 there?  
 21 A. Yes.  
 22 Q. If we go over to the top of page 18, if we pick up three  
 23 lines down, so this is talking about metal panels, it  
 24 says:  
 25 "They may also generate large pieces of falling

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1 debris if the integrity of the fixings to the railing  
2 systems is lost during the fire . Metal panels such as  
3 aluminium may fall from the system if the strength of  
4 the fixings is affected by the local fire source. They  
5 may also melt, generating molten metal debris if exposed  
6 directly to the sustained flame envelope."

7 Do you see that there?

8 A. Yes.

9 Q. Now, you say you didn't see this guidance and you  
10 weren't aware of it ; were you aware in general terms of  
11 those kind of phenomenon in terms of metal panels such  
12 as aluminium? Were you aware of this , melting,  
13 "generating molten metal debris if exposed directly to  
14 the sustained flame envelope"? Were you aware of that  
15 in general terms?

16 A. Yeah, from doing the structural degree I was aware that  
17 aluminium has a much lower melting temperature than  
18 steel , and with the temperatures created in a fire ,  
19 aluminium will melt.

20 Q. Now, the version of this document that was closest in  
21 time to the Grenfell fire is the 2013, the third edition  
22 of BR 135. If we can pull this up at {CEL00003364}.  
23 Again, there is the front page. It's the third edition,  
24 it was dated 2013, and it was by Sarah Colwell and  
25 Tony Baker.

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1 Does that front page help in terms of whether you  
2 saw this version, the third edition , at the time of the  
3 Grenfell project?

4 A. I recognise it now, but I don't believe I saw it then.

5 Q. I want to have a look at page 22 {CEL00003364/22}, at  
6 just one piece of this at the moment, at  
7 paragraph 6.4.1, page 22, the last paragraph on the  
8 right-hand side there, and it begins, "Combustible  
9 panels are typically ", and it's immediately before  
10 6.4.2. It says:

11 "Combustible panels are typically based on vinyl or  
12 glass-reinforced plastic , although various new products  
13 are being developed in this area, some of which also  
14 contain insulation materials. These products generally  
15 have good surface spread of flame characteristics to  
16 prevent rapid fire spread across the surface of the  
17 system, but once the panels become involved in the fire ,  
18 they have the potential to generate falling debris, add  
19 to the overall fire load, and provide a route for fire  
20 to propagate up the outside of the building."

21 Do you see that there?

22 A. Yes.

23 Q. Again, I know you say you didn't see this at the time,  
24 but were you aware in general terms that there were  
25 various new combustible panel products being developed

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1 at this time, some of which contain insulation  
2 materials, that could have those characteristics in  
3 terms of generating falling debris, adding to the fire  
4 load and providing a route for fire spread up the  
5 outside of the building? Were you aware of that?

6 A. No, the only thing I was aware of is that they would  
7 melt.

8 Q. Would you agree with me now, looking at that, that this  
9 paragraph appears to be warning about precisely the kind  
10 of products like ACM that are combustible, that might  
11 generate falling debris, add to the overall fire load,  
12 and lead to the propagation of fire up the external  
13 envelope of the building?

14 A. Yes.

15 MS GRANGE: Mr Chairman, that's a good moment to stop.

16 SIR MARTIN MOORE-BICK: It's very good timing, well done.  
17 Thank you.

18 Mr Anketell-Jones, that's enough for one day,  
19 I think. We will break there. I will have to ask you  
20 to come back for some more questions tomorrow, please.  
21 So we'll resume at 10 o'clock tomorrow, and please  
22 remember what I said to you earlier : it's very important  
23 that you don't discuss your evidence or anything related  
24 to it while you're out of the room. All right?

25 THE WITNESS: Yes, sir.

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1 SIR MARTIN MOORE-BICK: If you would like to go with the  
2 usher, we will see you at 10 o'clock tomorrow.  
3 Thank you.

4 THE WITNESS: Thank you.

5 (Pause)

6 SIR MARTIN MOORE-BICK: Good. Thank you, 10 o'clock  
7 tomorrow.

8 MS GRANGE: Thanks.

9 (4.30 pm)

10 (The hearing adjourned until 10 am  
11 on Tuesday, 15 September 2020)

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