

OPUS 2

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Day 21

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1 Wednesday, 15 July 2020
 2 (10.00 am)
 3 (Proceedings delayed)
 4 (10.15 am)
 5 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 6 today's hearing. Today we are going to continue hearing
 7 evidence from Mr Sounes.
 8 So could you ask Mr Sounes to come in, please.
 9 MR BRUCE SOUNES (continued)
 10 SIR MARTIN MOORE-BICK: Good morning, Mr Sounes.
 11 THE WITNESS: Good morning.
 12 SIR MARTIN MOORE-BICK: Are you ready to carry on?
 13 THE WITNESS: Yes.
 14 SIR MARTIN MOORE-BICK: All right, thank you.
 15 Yes, Ms Grange.
 16 Questions from COUNSEL TO THE INQUIRY (continued)
 17 MS GRANGE: Thank you, good morning.
 18 I want to start by picking up some follow-up
 19 questions on some of the topics we covered yesterday.
 20 I want to start by looking back at the insulation topic
 21 that we discussed.
 22 Now, you suggested yesterday that Celotex FR5000
 23 didn't burn, it just charred -- that was your
 24 understanding -- and you said {Day20/42:2-4):
 25 "... the whole history of polyurethanes had been

1

1 solved and it was safe to use in cavities. That was my
 2 understanding at the time."
 3 So that's taken from the transcript yesterday.
 4 I want to ask you, and really the key question is
 5 why you didn't include that kind of information in your
 6 witness statement, because you mentioned PIR at several
 7 places in your witness statement, for example at 43.9
 8 {SEA00014273/20}, 116.2 {SEA00014273/54}, and 287
 9 {SEA00014273/118}. In those paragraphs, you don't
 10 express a view about the properties of the material; you
 11 simply say it had been suggested by Max Fordham.
 12 Can I just ask: this point about the whole history
 13 of polyurethanes having been solved by that time and it
 14 was safe to use in cavities, is that information you
 15 have in fact discovered since you gave evidence in
 16 March, or can you be clear that that was in fact in your
 17 mind when you were looking at the insulation products on
 18 the Grenfell project?
 19 A. It was definitely my knowledge, yes, prior to -- prior
 20 to beginning at Studio E in 2000.
 21 Q. And you say that, as we've discussed --
 22 A. On a general level, there are very few locations in my
 23 witness statement where I have relied on an account that
 24 isn't evidenced.
 25 Q. Right.

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1 A. So, wherever possible, the statement has been built on
 2 the facts.
 3 Q. Yes, the documents?
 4 A. The documents, yeah.
 5 Q. Does that mean that your statement doesn't deal with
 6 things that you can remember about, for example, verbal
 7 conversations that were had?
 8 A. Correct, and in particular the prior knowledge of ACM.
 9 I, in retrospect, could have put a lot more in.
 10 Q. I see.
 11 A. The witness statement was an account, obviously led by
 12 our legal team, telling a story with the documents.
 13 Q. I see. Okay.
 14 Were you specifically told that you shouldn't
 15 include anything about your recollection of --
 16 A. No, no.
 17 Q. -- verbal discussions? No, but that's how it came out
 18 in the end?
 19 A. How it came out, that's ... yes. That's how it came
 20 out.
 21 Q. Okay.
 22 Now, we see that you have said the whole history of
 23 polyurethanes had been solved and it was safe to use in
 24 cavities; did that understanding flow from the
 25 discussion you said you had with the Celotex

3

1 representative in 1998/1999 about the Sun Valley fire
 2 which you mentioned yesterday?
 3 A. I can't obviously recall what fire they were referring
 4 to. That's later research on my part. But I do recall
 5 them discussing a fire where a firefighter had been
 6 killed.
 7 Q. Okay.
 8 I think it's right, but can we just clarify, that
 9 you said you understood that this fire had involved
 10 polyurethane insulation and cavities in the roof which
 11 had contributed?
 12 A. Well, I believe it might have been that fire. I'm not
 13 an expert in the subject of the history of fires.
 14 I believe there was probably more than one fire.
 15 Q. Yes, but just to be clear, was it your understanding
 16 that the fire had involved polyurethane insulation?
 17 A. That I can't recall, no. No. It was the risk of
 18 polyurethane in cavities which had become an issue.
 19 Q. And which you were aware of?
 20 A. Well, that's -- I wasn't aware of it in 1998/1999 --
 21 Q. But were you aware of it by the time of the Grenfell
 22 project?
 23 A. I'm sorry, when Celotex presented their product to us,
 24 because at that time, before 2000, it was a relatively
 25 novel -- I don't know if "novel" is the right word, but

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1 it was not as widely used as it is today, so we were
 2 given some background as to its use and to why it has
 3 become acceptable to use it.
 4 Q. I see. But I'm thinking back to what you said about the
 5 Sun Valley fire, and I want to know whether you had
 6 understood at the time of the Grenfell project that that
 7 fire had involved polyurethane insulation?
 8 A. No. No.
 9 Q. No.
 10 A. No.
 11 Q. Were you aware that PIR is a type of polyurethane
 12 insulation?
 13 A. I know it's blown insulation. That's not to say,
 14 I believe the substance is the same, I'm not sure,
 15 I just know it's a blown insulation.
 16 Q. Is it right that you were aware that both PIR and PUR
 17 are plastic foam insulation; you knew that much?
 18 A. Well, I knew they're not mineral. They don't really
 19 present -- they don't -- you wouldn't use the word
 20 "plastic" to describe them, but I knew they weren't
 21 mineral, yes.
 22 Q. Okay.
 23 At the time, would you have had concerns about the
 24 use of a polyurethane insulation? At the time of the
 25 Grenfell project, would you have had concerns about

5

1 that?
 2 A. I wouldn't have looked at it at all --
 3 Q. Because?
 4 A. -- based on prior knowledge.
 5 Q. Because you thought by this time they were safe to use,
 6 is that what you're saying?
 7 A. If someone had presented me with a datasheet with
 8 polyurethane, I would have obviously challenged it.
 9 Q. Right.
 10 A. I didn't go looking for it because I was aware that that
 11 was not acceptable, it was not generally used. It had
 12 fallen out of use, I believe.
 13 Q. I think my question is if you would have been concerned
 14 about the use of a polyurethane insulation, why were you
 15 not concerned about the use of a PIR insulation, given
 16 they're both plastic foam insulation products?
 17 A. Have you not come full circle? I was of the
 18 understanding that the susceptibility of polyurethane to
 19 burn, sustained burning, had been solved with
 20 polyisocyanurate.
 21 Q. Right, okay.
 22 Now, just moving on to what we discussed about the
 23 ACM material yesterday, and I asked you about the
 24 Hays Galleria meeting that you had; do you remember
 25 that?

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1 A. Yes.
 2 Q. I asked you this question {Day20/135:4-7}:
 3 "Question: Did you think about its fire performance
 4 and whether it might be sacrificing fire performance in
 5 the interest of price?
 6 "Answer: No, no, I don't."
 7 Then you carried on.
 8 We just want to be absolutely crystal clear --
 9 A. Are you talking about insulation or the cladding?
 10 Q. We're talking about the cladding now.
 11 A. Right.
 12 Q. When I asked:
 13 "Did you think about its fire performance and
 14 whether it might be sacrificing fire performance in the
 15 interest of price?"
 16 What I want to be clear on is: did you think about
 17 that at the time, or is your evidence that you just
 18 can't recall whether you thought about it?
 19 A. I do not recall thinking that there was any sacrifice in
 20 terms of fire performance.
 21 Q. Yes.
 22 A. I did not believe the panels offered any fire resistance
 23 because they're a very lightweight panel.
 24 Q. Okay.
 25 A. Which is quite a different thing to suggesting that they

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1 offered some kind of hazard.
 2 Q. Okay.
 3 A. Completely different.
 4 Q. Thank you.
 5 Then yesterday, when we were discussing why ACM
 6 ended up being included in the NBS specification as one
 7 of the alternatives, you referred to an email from
 8 Mr Maddison of the TMO which you said was relevant to
 9 this.
 10 A. Yes.
 11 Q. I want to see if an email that we found overnight might
 12 be the right email. This is {SEA00008836}. What we see
 13 here is an email from Peter Maddison of 1 October 2013
 14 to you, copying in David Gibson and Claire Williams at
 15 the TMO.
 16 If we just look down to the email below, it's in
 17 response to your report back of your meeting with Harley
 18 Curtain Wall, Friday, 27 September. Do you see that
 19 there?
 20 A. Yes. I did look -- check this.
 21 Q. I beg your pardon?
 22 A. Sorry, I did look this up last night.
 23 Q. And if we go back up, have I got the right email?
 24 A. This is the email that I recall.
 25 Q. Great. So what we see is Peter Maddison saying:

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1 "Hi Bruce
 2 "Thanks for this .
 3 "Did he give a similar estimate of an Aluminium
 4 solution?
 5 "Peter."
 6 So he's querying whether there was an estimate for
 7 an aluminium solution.
 8 Can you just explain to us, with reference to what
 9 you said yesterday, why this was then relevant to what
 10 went into the NBS specification?
 11 A. I think it's ... it's the only -- there are only
 12 a handful of emails from Peter, but that is one that
 13 mentions the aluminium and I do know that this was
 14 discussed. So this infers an expectation, but there
 15 were discussions which guided us to include it as
 16 an option.
 17 Q. I see. So you're saying that there were discussions in
 18 parallel at the same time with these emails on that
 19 topic; is that correct?
 20 A. Yes.
 21 Q. And who did you have those discussions with exactly?
 22 A. I think it would have come up in one of the project
 23 meetings around this time. As we were finalising the
 24 tender information, we did have project meetings, and
 25 I think I can recall it being discussed.

9

1 Q. What's your recollection as to what you were being told
 2 by the TMO about their position?
 3 A. They wanted an option, that was -- that's my
 4 understanding. Sorry, I can't recall specific --
 5 Q. Okay, but they wanted an option for ACM included in the
 6 specification and the employer's requirements for the
 7 project?
 8 A. Aluminium. I wouldn't go so far as to say ACM, but --
 9 Q. And they were clear that that was to be included in the
 10 employer's requirements, were they, for the project?
 11 A. My understanding is it was included in the tender --
 12 form of tender. So the tendering contractors were given
 13 a box to complete for that option.
 14 Q. Yes. Yes. Thank you.
 15 If I can then pick up where I had got to yesterday
 16 on the ACM. I now want to look at paragraph 377 of your
 17 statement. If we can go to {SEA00014273/153}. In that
 18 paragraph you say that:
 19 "On 23 April 2014, Simon Lawrence (Rydon) forwarded
 20 me some information received from Deborah French of
 21 Alcoa ... I filed the email attachments to a sub-folder
 22 in Studio E's project file. Having checked the
 23 sub-folder, it appears that the attachments to Rydon's
 24 email included ..."
 25 And then you have set out a number of documents

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1 there in subparagraphs.
 2 If we look at paragraph 377.3, we can see that
 3 included within those documents was a British Board of
 4 Agrément certificate titled "Product sheet 1 - Reynobond
 5 Architecture Wall Cladding Panels" dated 14 January
 6 2008, referred to as the BBA certificate. Do you see
 7 that there?
 8 A. Yes.
 9 Q. Then at paragraph 381 on page 154 {SEA00014273/154} you
 10 say this:
 11 "I would have read the Reynobond documents between
 12 23 April 2014 and 15 May 2014 ... While I do not recall
 13 specifically what I noted from them at the time, I would
 14 have been reviewing them from an architectural
 15 perspective and would have been particularly interested
 16 in the colour charts, because the focus at the time was
 17 getting planning approval for the materials in an
 18 aesthetic sense."
 19 Do you see that there?
 20 A. Yeah.
 21 Q. Now, can we take it that you don't actually have
 22 a specific recollection of sitting down and reading
 23 those Reynobond documents, and that you're making
 24 an assumption that you would have read them in that
 25 period thereafter?

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1 A. I think at that point, with the exception of the BBA
 2 certificate, we had those in hard copy, particularly the
 3 colour brochures, colour -- the types of colour, and
 4 those are the documents which we passed on last year.
 5 I think the BBA certificate, I did not spend long on
 6 it, but I think you'll come to in a moment where I --
 7 there is evidence I did look at it.
 8 Q. Yes.
 9 A. Yeah.
 10 Q. Okay.
 11 Would it have been your normal practice to read
 12 a BBA certificate for a product that you were intending
 13 to use on a project?
 14 A. If you were looking to specify it, you would, yes.
 15 Q. Yes.
 16 A. It's usually something that is asked for by
 17 Building Control, or very often.
 18 Q. Yes.
 19 A. Invariably it's something that Building Control would
 20 like to see to verify that the product is suitable for
 21 its application.
 22 Q. Yes.
 23 A. So having it in your hand has often only become
 24 necessary once you make your application for that item.
 25 Q. Yes.

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1 Was it your practice to read the whole of a BBA
 2 certificate for a product you were proposing to use?
 3 A. No.
 4 Q. What would your --
 5 A. Not at this stage, which ... where we had -- you know,
 6 this was received long before we were going to be
 7 submitting to Building Control.
 8 Q. Okay. So what would your approach to that kind of
 9 certificate be? What would you do with it at this
 10 stage?
 11 A. As we have done here, we filed it under the relevant
 12 section.
 13 Q. Yes. Okay.
 14 Now, we've seen that you have said there in that
 15 paragraph of your statement that you would have reviewed
 16 the product from an architectural perspective and would
 17 have been particularly interested in the colour charts
 18 because, at that point, the focus was on planning
 19 approval and aesthetic appearance.
 20 I think it's right that you also considered service
 21 life and durability of the product at this stage; is
 22 that right?
 23 A. Yes.
 24 Q. Let's go to {SEA00010953}. This is an email, if we can
 25 just blow up the top, of 15 May 2014 from you to

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1 Peter Blythe of Artelia, and we can see that in the
 2 first sentence you're saying:
 3 "Peter
 4 "Reynobond's BBA certificate includes the following
 5 statement regarding service [life]: '(The product) has
 6 an ultimate service life in excess of 30 years ... can
 7 be expected to retain a good appearance for up to 20
 8 years.'
 9 Do you see that there?
 10 A. Yes.
 11 Q. So it would appear that you looked carefully at the
 12 certificate regarding its service life and durability;
 13 is that fair?
 14 A. Yes.
 15 Q. Now, you go on to say at paragraph 381 of your statement
 16 {SEA00014273/154}, six lines down:
 17 "At this stage, neither Studio E nor Harley were
 18 carrying out detailed design ..."
 19 Do you see that there?
 20 A. Yeah.
 21 Q. I just want to ask you some questions about that.
 22 Are you suggesting there that the selection of
 23 cladding products, as opposed to, for example, how to
 24 form the joints or the fixings for them, was a matter of
 25 detailed design?

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1 A. I'm sorry, could you just repeat that?
 2 Q. Are you suggesting there that the selection of cladding
 3 products, as opposed to, for example, how to form the
 4 joints or the fixings for those panels, was a matter of
 5 detailed design?
 6 A. Am I saying that the selection of the products is
 7 a subject of detailed design?
 8 Q. Yes. Because you're making the point here, and I want
 9 to ask you what point you're really making, you say:
 10 "At this stage, neither Studio E nor Harley were
 11 carrying out detailed design, as can be seen from
 12 an email from Mark Harris ... to Simon Lawrence ... where
 13 he says 'cladding detailing etc will have to be dealt
 14 with as part of the main scheme design' ..."
 15 And then you go on about conversations with
 16 Daniel Anketell-Jones.
 17 But I'm asking a more basic question, which is about
 18 the simple selection of a cladding product, whether that
 19 was part of the detailed design process or came earlier?
 20 A. Okay. The selection of the products came via Rydon, and
 21 I -- you haven't given the context for this email, which
 22 I think is quite relevant.
 23 Q. Okay. Do you want to give me the context for it?
 24 A. We had met with planning to present them the alternative
 25 cladding products, the aluminium, and that had been

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1 attended by Rydon, the TMO and Artelia, and Artelia had
 2 prepared a note for that meeting where they had -- that
 3 note had been circulated, comparing it favourably --
 4 sorry, comparing the durability of the ACM with the zinc
 5 as being comparable.
 6 Q. Yes.
 7 A. And I didn't believe that was true.
 8 Q. No. Yes.
 9 A. So I was prompted to dig out the BBA and --
 10 Q. Yes, and make that clear.
 11 A. -- contradict it, yeah.
 12 Q. Mr Sounes, I entirely accept your focus at this point
 13 was on gaining planning approval, but do you agree that
 14 before proposing materials to planners, you ought to be
 15 sure of their suitability in principle for use on the
 16 project?
 17 A. Yes.
 18 Q. Did you look at the fire performance of the panels with
 19 reference to the BBA certificate at this stage?
 20 A. I don't recall doing so, no. And I think at this stage
 21 we were not proposing the material.
 22 Q. I see, so you're drawing a distinction, are you, between
 23 what Rydon were doing and what you were doing?
 24 A. I am, I think. I think that needs to be stated quite
 25 clearly. At this point, the proposal is coming from

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1 Rydon.
 2 Q. You're still retained as architect and lead consultant
 3 on the job, aren't you, at this point?
 4 A. Yes.
 5 Q. Can you explain why you didn't look at the fire
 6 performance at this stage?
 7 A. It was not a concern and it would not be for us to
 8 complete the detailed design. It was not a concern. We
 9 have seen -- we had discussed yesterday that we had seen
 10 many buildings completed with the product.
 11 Q. Again, just back to what you mean by detailed design, do
 12 you mean that questions of fire performance of a product
 13 are matters of detailed design which you would not
 14 expect to be involved in?
 15 A. We very much were involved in matters of detailed design
 16 relating to the fire -- fire issues. So I ... I'm
 17 sorry, I'm still just struggling to understand the
 18 question.
 19 Q. You seem to be drawing a distinction as to what was
 20 occurring at that stage and what you were involved in,
 21 and you said you weren't completing the detailed design,
 22 which seemed to imply that it wasn't your role to be
 23 looking at fire performance, and I was just testing
 24 that.
 25 A. Our position, as outlined in our opening statement, is

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1 the detailed design had been taken over by the main
 2 contractor and, we understood, delegated to their
 3 specialist subcontractor, and this had been our
 4 expectation from the outset.
 5 Q. So does that mean that you didn't think it was any part
 6 of Studio E's role from that point forward to look at
 7 the fire performance of the panels that were being
 8 considered?
 9 A. No. I think it was certainly, were we aware of
 10 anything, we should have raised it. But as to actually
 11 responsibility for the selection and implementation, no,
 12 that did not sit with us.
 13 Q. What I want to put to you is: isn't it illogical to be
 14 seeking planning permission for a material that was
 15 potentially unsuitable if it didn't have the right fire
 16 performance? Shouldn't that have been something that
 17 you checked before it's submitted to planning?
 18 (Pause)
 19 A. I'm struggling to ... to answer your question, because
 20 we were submitting a product which is a generic
 21 composite product, and the focus is on the finish.
 22 Q. Okay.
 23 A. Obviously since we've learnt that it came in different
 24 cores, but that was not -- that wouldn't make -- have
 25 made a difference to the conversation about the

18

1 appearance at this stage.
 2 Q. Okay.
 3 Can we now look at the BBA certificate itself. This
 4 is at {SEA00000516}. If we can zoom in, in the bottom
 5 half of that, we see under "Key factors assessed" that
 6 it has a section "Behaviour in relation to fire". Do
 7 you see that there? Third heading down.
 8 A. Yes.
 9 Q. It says there:
 10 "Behaviour in relation to fire -- in relation to the
 11 Building Regulations for reaction to fire, the panels
 12 may be regarded as having a Class 0 surface in England
 13 and Wales, and a 'low risk' material in Scotland (see
 14 section 6)."
 15 Do you see that there?
 16 A. Yes.
 17 Q. Do you have any recollection of reading that at the
 18 time?
 19 A. No.
 20 Q. Or at any time on the Grenfell project?
 21 A. No, my involvement reduced after -- around this point.
 22 Q. Yes. So it follows, therefore, does it, that you didn't
 23 ever look at section 6 of the certificate?
 24 A. No.
 25 Q. If we go to the top of page 2 {SEA00000516/2}, it

19

1 states, right at the top:
 2 "In the opinion of the BBA, Reynobond Architecture
 3 Wall Cladding Panels, if used in accordance with the
 4 provisions of this Certificate, will meet or contribute
 5 to meeting the relevant requirements of the following
 6 Building Regulations."
 7 Do you see that there?
 8 A. Yes.
 9 Q. Then in the detailed information, two kind of main
 10 sections down, it says:
 11 "The panels are judged to meet the Class 0
 12 requirements."
 13 Do you see that there?
 14 A. Yeah.
 15 Q. Did you have an awareness, aside from this certificate,
 16 which you said you didn't look at, that the panels had
 17 a class 0 rating under the relevant England and Wales
 18 requirements?
 19 A. I can't recall.
 20 Q. If --
 21 A. I mean, I would have assumed that they had on the basis
 22 of being aluminium, but I don't recall.
 23 Q. Okay. If we go on to page 3 {SEA00000516/3} of this
 24 certificate, under the heading "General" at the top, in
 25 the third paragraph there is a paragraph that says:

20

1 "It is important for designers, planners,
2 contractors and/or installers to ensure that the
3 installation of the cladding is in accordance with the
4 Certificate holder's instructions and the information
5 given in this Certificate."

6 Do you see that?

7 A. Yes.

8 Q. Again, were you aware that it would be important for
9 a designer to ensure that the installation of the
10 cladding -- were you aware in general terms, in terms of
11 looking at BBA certificates, that it was important for
12 designers to ensure that the installation was in
13 accordance with the certificate holder's instructions
14 and the information given in a BBA certificate?

15 A. I didn't understand that as being the purpose of this
16 BBA certificate, no.

17 Q. Okay.

18 A. Our practice typically would be to approach the
19 supplier, in this instance, and discuss with him the
20 requirements of the project and understand how their
21 system could be used for the specific application.
22 I didn't ... I didn't see it as the purpose of the BBA
23 to tell you that.

24 Q. Okay.

25 I think it's right at this time you did understand

21

1 that there was a difference between a riveted system and
2 a cassette system; is that correct?

3 A. Yes.

4 Q. At page 4 {SEA00000516/4}, if we can look at
5 paragraph 3.6, it says there, at the very last part of
6 that "General" section:

7 "All design aspects of the installation should be
8 checked by a suitably qualified chartered engineer or
9 other appropriately qualified person. For advice on
10 specific construction details, eg flue pipe
11 penetrations, the Certificate holder should be
12 consulted."

13 So just taking that first sentence, were you aware
14 that all design aspects of the installation should be
15 checked by a suitably qualified chartered engineer? Was
16 that something you had been made aware of by looking at,
17 for example, other BBA certificates for other products?

18 A. Again, the relevance of the BBA certificate -- I don't
19 think there is a relevance of a BBA certificate here.
20 Where you have a specialist cladding package, whether it
21 be a roof or elevation, it would involve some
22 engineering to verify it.

23 Q. Would it be fair to say that you principally saw the
24 purpose of the BBA certificate to be something that you
25 could provide to Building Control when the time came to

22

1 satisfy Building Control that the relevant requirements
2 were met? Is that really how you viewed that BBA
3 certificate?

4 A. I don't recall looking at it in those terms for this
5 product, but for other products that I've used on other
6 projects, yes, it has ... it's often something we've had
7 to chase to get our hands on.

8 Q. Let's look then at page 5 {SEA00000516/5} under
9 section 6. If we could zoom in on that whole section.
10 We have a detailed section here, "Behaviour in relation
11 to fire", and I think you have said you didn't read this
12 at this time of the Grenfell project; is that right?

13 A. No.

14 Q. At any time?

15 A. No, I wouldn't have read it.

16 Q. No. It's referring in 6.1 to a standard sample of the
17 product with a grey/green Duragloss coating being tested
18 and achieving European class B.

19 You have already told us that, at the time, you
20 weren't aware of the European classification and testing
21 system, so is it right that you wouldn't have understood
22 what a class B meant, even if you had read it?

23 A. No.

24 Q. When you say "No", do you mean, "Yes, I wouldn't have
25 understood it"?

23

1 A. I wouldn't have understood it.

2 Q. I want to ask you about the use of the phrase "standard
3 sample" there, because what we see in the next
4 subparagraph, 6.2, is it's drawing a distinction between
5 a standard sample of the product and then a fire
6 retardant sample of the product.

7 Were you ever aware that there was this distinction
8 in terms of these Reynobond panels between a standard
9 and a fire retardant sample?

10 A. I do not recall being aware of --

11 Q. So that's not something you were ever told by Arconic or
12 CEP or Harley?

13 A. My recollection is the core was never discussed.

14 Q. Then in 6.4 there is a warning. It says there:

15 "These performances may not be achieved by other
16 colours of the product and the designations of a
17 particular colour should be confirmed by:

18 "England and Wales -- Test or assessment in
19 accordance with Approved Document B ..."

20 Do you see that there?

21 A. Yes.

22 Q. Again, I want to ask you in general, were you aware that
23 there might be different performances achieved by other
24 colours, and that that is something that needed to be
25 confirmed on a specific project?

24

1 A. I wasn't aware of it at the time. I would have thought
 2 it a very strange thing to say at the time.
 3 Q. Yes.
 4 A. I would have thought the colour would have made
 5 negligible difference.
 6 Q. Okay.
 7 So you weren't aware in general that, if you were
 8 choosing a different colour or finish, that might affect
 9 the fire performance and therefore ought to be something
 10 that you checked?
 11 A. As I say, the finish is so thin, I would have thought
 12 there would have been negligible difference. In fact,
 13 why would it be worth even mentioning? I couldn't --
 14 I wouldn't have understood that at the time.
 15 Q. At the end of this section, "Behaviour in relation to
 16 fire", at 6.6, it says:
 17 "Cavity barriers should be incorporated behind the
 18 cladding, as required by the national Building
 19 Regulations, but should not block essential ventilation
 20 pathways."
 21 Then we see this sentence:
 22 "Particular attention should be paid to preventing
 23 the spread of fire from within a building breaching the
 24 cladding system through window and door openings."
 25 Do you see that there?

25

1 A. Yes.
 2 Q. Now, I appreciate you didn't read this at the time, but
 3 I want to know whether you were aware of that need for
 4 particular attention with these kind of panels for
 5 preventing the spread of fire through window and door
 6 openings.
 7 A. Well, I didn't read this section. Had I read it,
 8 I wouldn't have understood that, that paragraph.
 9 Q. You wouldn't have understood it?
 10 A. No.
 11 Q. So you wouldn't have understood that it might be linking
 12 back to the provisions in Approved Document B about
 13 cavity barriers around openings?
 14 A. No. To me this suggests you can't have windows. That's
 15 my reading of it.
 16 Q. Isn't it saying just that it's something that needs
 17 particular attention to preventing the spread of fire,
 18 breaching the cladding system through window and door
 19 openings, that it's something that has to be of
 20 particular focus? Not saying you can't use these where
 21 you have windows, but saying you have to have a tight
 22 focus on that topic?
 23 A. That's not what it says. It says, "preventing the
 24 spread of fire from within a building breaching the
 25 cladding system through window". So no windows.

26

1 Sorry, I find it absurd. I wouldn't have understood
 2 that.
 3 Q. Okay. If you hadn't understood it, would you have
 4 clarified it, you know --
 5 A. Yes.
 6 Q. If you read a BBA certificate and you don't understand
 7 something, would you routinely --
 8 A. If we had a relationship with the suppliers, yes,
 9 I possibly would have. But this is all hypothetical,
 10 because I didn't.
 11 Q. In paragraph 386 of your statement {SEA00014273/155} you
 12 say that you have, since the fire, now read the BBA
 13 certificate, and you say now, with the benefit of
 14 hindsight, there was nothing on the face of it that
 15 alarmed, warned or concerned you about Rydon's proposal
 16 to use the ACM.
 17 Is it right that, even now, you wouldn't have
 18 thought that the caveat in 6.4 about different colours
 19 would have been something that would be important to
 20 follow up?
 21 A. If I was reviewing this with the supplier, I might ask,
 22 because it seems a curious point to make, that one
 23 colour could make any difference at all.
 24 Sorry, your question was: do I think now that it
 25 would have been important to --

27

1 Q. Yes. You have said in your statement, "I have read it
 2 and, even now, there would be nothing that alarmed,
 3 warned or concerned me about Rydon's proposal to use
 4 ACM".
 5 What I'm asking is: when you read that paragraph,
 6 6.4, "These performances may not be achieved by other
 7 colours", did that not strike you as something you would
 8 have been concerned about and something you would have
 9 wanted reassurance on?
 10 A. I might have done, had I been reading it, yes, I might
 11 have done, but I repeat: that does seem a strange point
 12 to make.
 13 Q. Okay.
 14 Now, I showed you the email that you sent of
 15 15 May 2014 where you forwarded the BBA certificate on
 16 to Peter Blythe of Artelia, and there you refer to the
 17 statement on the panels' service life and appearance.
 18 To establish that, you would have had to have gone to
 19 section 9 of this certificate on the top of page 6
 20 {SEA00000516/6}, so that's one page on from the fire
 21 section. Can we just look at that, page 6 of this.
 22 Yes.
 23 So there, under 9.1 -- do you see that? -- that's
 24 where it's talking about "expected to have an ultimate
 25 service life in excess of 30 years"? Do you see that?

28

1 A. Yes.
 2 Q. That was the information you were then relaying on to
 3 Artelia, and you have explained to us helpfully what the
 4 context to that was.
 5 But it remains your evidence, does it, that despite
 6 looking at that specific section, you wouldn't have
 7 looked at the fire performance section on the way
 8 through reading the certificate?
 9 A. I can't recall, but I could well have used the search
 10 function.
 11 Q. Is it right that you did not ever seek any specific
 12 guidance on the meaning and effect of the BBA
 13 certificate from Exova?
 14 A. No, I didn't.
 15 Q. And you didn't ever ask for any discussions about the
 16 BBA certificate with Rydon or Harley?
 17 A. No.
 18 Q. And you didn't contact the manufacturer, Alcoa or
 19 Arconic, and ask for any further information?
 20 A. No.
 21 Q. No.
 22 I think it's right, but can you confirm, that you
 23 never yourself sought any further advice from Exova on
 24 the fire performance of the cladding panels after this
 25 point?

29

1 A. I didn't, no.
 2 Q. Studio E didn't. Do you know whether anyone else at
 3 Studio E did?
 4 A. I ... obviously there's all of Neil's evidence and his
 5 witness statement.
 6 Q. Yes. But --
 7 A. Which I was aware of at the time, but that's all
 8 I can ...
 9 Q. Are you saying you were aware at the time that
 10 Neil Crawford specifically asked Exova and Mr Ashton
 11 about the fire performance of the ACM panels? Is that
 12 your clear recollection at the time?
 13 A. No. No, I don't have a clear recollection of that.
 14 Q. No.
 15 Now, just a few brief questions about the planning
 16 process and ACM, because we know we're kind of within
 17 the planning process in what we have been looking at for
 18 some of this morning.
 19 You have set out your evidence of the planning
 20 process in your witness statement. I'm not going to go
 21 through that in detail, but I think there are some
 22 matters that we can agree on, and I just want to check.
 23 Is it right that the planning permission that was
 24 granted included a condition that materials to be used
 25 on the external faces of the building were to be subject

30

1 to separate approval by RBKC; is that correct?
 2 A. Yes.
 3 Q. So, in effect, the planning permission itself did not
 4 give approval to any particular kind of cladding panel;
 5 is that right?
 6 A. Yes.
 7 Q. Is it correct that the RBKC planning department was
 8 generally wary of the change from zinc to ACM?
 9 A. I think you're asking me to summarise their response,
 10 which is obviously best for them to give. But they --
 11 that's not an unfair portrayal. They -- not wary, but
 12 they had concerns about the overall appearance.
 13 Q. Yes.
 14 A. Which is documented.
 15 Q. Yes, that's my next question: is it fair to say that the
 16 planning officers' primary concern was the colour and
 17 appearance of the panels?
 18 A. Yes. Yes, it was.
 19 Q. There was also an issue, wasn't there, over whether
 20 a face-fixed or a cassette panel would be more
 21 acceptable to the planners?
 22 A. Yes.
 23 Q. Is it right that, ultimately, the decision to go for
 24 cassette-fixed over face-fixed was driven by the
 25 planning officers?

31

1 A. Driven ... the planners, I think, are on record saying
 2 they didn't like the visible fixings.
 3 Q. Yes, the visible fixings in the face-fixed.
 4 A. Yes. But whether that's fair to say they drove it, I'm
 5 not sure.
 6 Q. Yes.
 7 Let's look at an email on that. This is at
 8 {SEA00011373}. This is an email of 28 July from the
 9 planners to David Gibson of the TMO. So this is
 10 Marc Watterson -- he is in the RBKC planning department,
 11 isn't he?
 12 A. Marc, no, he is the planning consultant.
 13 Q. Sorry, he's the planning consultant.
 14 A. He did sit in the RBKC planning. He commuted from
 15 Manchester, I think.
 16 Q. Yes. Thank you.
 17 So he is emailing David Gibson and copying in you,
 18 "Grenfell feedback", and then you see in the second
 19 paragraph I think what you were just describing:
 20 "The email exchange is set out below but in
 21 particular, the LPA ..."
 22 What does LPA stand for?
 23 A. Local planning authority.
 24 Q. Yes:
 25 "... object to the idea of any exposed fixings on

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1 the building. I pushed them on having exposed fixings
 2 higher up the building but their concern, which has also
 3 been borne out of other site visits, is that the rivets
 4 would become rust 'attractors' and then stain the
 5 cladding. They are aware of the cost savings but on
 6 this occasion they do not outweigh their concerns over
 7 quality, appearance and longevity. I advised Claire
 8 that I do agree with this position and I do not feel
 9 that it is worth pushing any further, however please let
 10 me know if you feel any differently."

11 Then he says:
 12 "We are still looking at the colour options ..."

13 So is that a good example of the mood music you were
 14 getting back from the planners about their reluctance to
 15 use the face-fixed and their preference for the
 16 cassettes?

17 A. Yeah, I think there are more -- there is an email from
 18 Sarah Scanell, I think, following her site visit, where
 19 she --

20 Q. Yes.

21 A. -- directly communicates their views.

22 Q. Yes, and we can see that this was notwithstanding the
 23 awareness -- and we see that from this email -- that the
 24 cassette-fixed was more expensive than the face-fixed?

25 A. I'm sorry, the --

33

1 Q. So they're clearly aware --

2 A. Of the cost.

3 Q. It says in the third line of that paragraph, "They are
 4 aware of the cost savings".

5 A. Yes.

6 Q. So they're aware that the face-fixed was a lot cheaper
 7 than the cassettes, wasn't it?

8 A. I don't know how much they knew.

9 Q. Okay. Well, they're clearly aware of that in
 10 principle --

11 A. In principle, but --

12 Q. -- based on this email.

13 Can I just ask you one final question on the
 14 planning: did you ever discuss fire safety of the
 15 cladding system with RBKC's planning department?

16 A. No, I don't recall.

17 Q. Would that be because that was a matter that was
 18 actually for RBKC Building Control rather than for their
 19 planners?

20 A. Yes.

21 Q. Now, at this point I want to ask you some questions
 22 about resident consultation, and I'm doing this now
 23 because what I'm going to be asking you is if you can
 24 help us a little bit more about what information was
 25 provided to the residents about the cladding panels

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1 during that consultation process.

2 What I want to look at is something called the
 3 Grenfell Tower regeneration project engagement
 4 statement. If we can this up, this is at {RBK00000236}.

5 So we can see there it's got your label on the top
 6 left, "Studio E", but then other logos around the
 7 bottom. It's:

8 "Grenfell Tower Regeneration Project, Engagement
 9 Statement, Planning Application, October 2012".

10 Is it right that this was submitted as part of the
 11 planning application --

12 A. Yes.

13 Q. -- at that point?

14 Who actually put this document together, do you
 15 know? Is it a document you're familiar with?

16 A. I haven't looked at it recently.

17 Q. But was it something Studio E put together, or was it
 18 put together by another party?

19 A. It's very unlikely we put it together.

20 Q. Okay.

21 A. I think it would have been between Taylor Young and
 22 RBKC.

23 Q. We will see what it does is it sets out in the
 24 introduction what the purpose was of the consultation,
 25 what the strategy was for consultation, and then, as we

35

1 go through, it contains within it a number of pieces of
 2 information, for example responses to questionnaires or
 3 newsletters that were sent to residents and feedback
 4 through it about what was being said by the community in
 5 response to the proposals.

6 Now, if we can turn to section 1, the introduction,
 7 on page 3 {RBK00000236/3}, we can see, picking it up in
 8 the second sentence of that first paragraph, it says:

9 "The consultation strategy agreed by Royal Borough
 10 of Kensington and Chelsea, in partnership with
 11 Kensington and Chelsea TMO was based on building
 12 positive engagement with local communities and
 13 stakeholders through consultation prior to Planning
 14 submission."

15 Do you see that there?

16 A. Yes.

17 Q. Was that your understanding of, in very general terms,
 18 what the consultation strategy was that had been agreed?

19 A. I wasn't aware that they were following any guidance.
 20 They were -- I was aware there was a consultation
 21 strategy in place and we participated in it, yes.

22 Q. Then paragraph 2 it says:

23 "The focus was to continue to provide opportunities
 24 for local residents to understand, and influence the
 25 development of the design proposals for the Grenfell

36

1 Tower Regeneration Project before the application was
2 submitted."

3 Do you see that there?

4 A. Yes.

5 Q. Again, was that your understanding, that it was to
6 provide opportunities for residents to influence the
7 development of the design proposals?

8 A. Yes.

9 Q. Then at paragraph 3 it says:

10 "In analysing the responses, there is clear evidence
11 of support for the project. However during the early
12 stages of the consultation there were some concerns over
13 elements of designs. Whilst we recognise that not
14 everyone will support the proposals, many of these
15 concerns have now been addressed and are reflected in
16 the proposed development."

17 Do you see that there?

18 A. Yes.

19 Q. Now, can you recall, did any of the concerns relate to
20 the external wall and the design proposals for that?

21 A. No, it was something that was consulted on, but I don't
22 recall any specific concerns.

23 Q. Okay. Can you recall in general what the types of
24 concerns were? I mean, we don't need to go into it in
25 detail, but can you recall the kind of broad topics that

37

1 were raised?

2 A. Before coming, I looked at the -- which I think you'll
3 have -- feedback summary from --

4 Q. Yes.

5 A. -- the sort of formal consultation that was done,
6 I think, in May 2012.

7 Q. Yes.

8 A. And the initial concerns were around security.

9 Q. Yes.

10 A. So I do remember that being --

11 Q. Yes.

12 A. -- raised and the request for cameras.

13 Q. Yes.

14 A. Obviously not directly related to the proposed works,
15 but I do remember that.

16 Q. Okay, yes.

17 Then finally we can see it says there in the last
18 paragraph:

19 "It also meets the guidance set out in the Localism
20 Act (2011) which sets out a requirement for community
21 engagement in advance of the submission of major
22 planning applications."

23 Do you see that there?

24 A. Yes.

25 Q. Then if we can go to page 4 {RBK00000236/4}, this is the

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1 consultation strategy, and what this does is set out the
2 approach to facilitating, it's detailed below, and in
3 a number of subparagraphs you can see the types of
4 strategies and measures that were being said to have
5 been deployed in order to get the feedback. So we have
6 got: community briefing session in February 2012; then
7 questionnaires with feedback questions; as from May,
8 weekly evening consultation meetings or weekly drop-in
9 sessions. We don't need to go through all that. Do you
10 see that? They're set out there.

11 Is it right that you were involved in some of those
12 specific sessions --

13 A. Yes.

14 Q. -- in which feedback was given by residents?

15 A. The questionnaire -- I can remember one questionnaire
16 session which is -- I think was the May one. The
17 evening consultation events, myself and possibly one or
18 more from Studio E attended. I know that the KCTMO were
19 on site often during the day as well --

20 Q. Right.

21 A. -- I think, in the base of the tower, in an office with
22 drawings on the wall.

23 Q. Okay, yes.

24 A. And that went on through the summer. There were
25 a number of them.

39

1 Q. Just in general, had you had any experience of dealing
2 with issues arising from consultation with residents in
3 a social housing context before doing a building
4 project? Was that something you had experience of?

5 A. No.

6 Q. When you embarked on this process, in terms of your
7 involvement, what did you think that the consultation
8 would involve? Were you aware that it would involve
9 these kind of measures?

10 A. We were led by RBKC as to what we were going to do, but
11 I understood it would be a mixture of presentations to
12 a group, and it's an information evening, and
13 questionnaires and discussions one-to-one with people in
14 a room.

15 Q. Yes.

16 Who did you discuss the need for consultation with
17 at RBKC?

18 A. As I recall it, it was Mark Anderson who led on that.

19 Q. Right.

20 A. When I said "led", I believe he was quite focused on it.

21 Q. Yes.

22 A. But he delegated that to us and others.

23 Q. Yes.

24 A. And he attended them as well.

25 Q. Yes.

40

1 Now, if we can go to section 3 of this document on
2 page 5 {RBK00000236/5}, this talks about the planning
3 brief consultation, and I just want to quickly look at
4 the fourth paragraph. It says there:

5 "Resident consultation meetings gave assistance to
6 Studio E when developing designs which meet the needs of
7 TMO requirements and to resident's expectations."

8 Do you see that there?

9 A. Yes.

10 Q. Would you agree with that statement, that the resident
11 consultation meetings did give assistance to Studio E
12 when developing designs?

13 A. I would agree to that. You're going to ask me how,
14 I think, but yes, I would agree to that. It was
15 a two-way process, but it was also explaining the
16 proposals to the residents.

17 Q. Yes.

18 A. So they can be -- ask questions and understand the
19 proposals.

20 Q. Yes.

21 At the bottom of that page, under a heading
22 "Section 4: Newsletters", the first paragraph under
23 "Newsletters", it says there:

24 "The main purpose of the project newsletters was to
25 provide key information of the project and feedback from

41

1 residents following consultation meetings."

2 Do you see that?

3 A. Yes.

4 Q. I'm going to show you some examples in a moment where we
5 see the newsletters actually setting out information
6 about some of the cladding proposals.

7 A. Yes.

8 Q. I just want to ask you some questions about that.

9 Did you actually play a part yourself in devising
10 and formulating the questionnaires that contained
11 feedback questions for residents? Was that a process
12 you were involved with?

13 A. I don't recall doing that, no.

14 Q. No.

15 Who do you think devised those questionnaires, do
16 you know?

17 A. Again, between KCTMO and Taylor Young. I'm not sure.

18 Q. Yes, okay.

19 If we go to section 6 of this engagement statement
20 on page 7 {RBK00000236/7}, this sets out the results of
21 a questionnaire sent to residents in March 2012. So you
22 can see at the top there it says:

23 "Resident's views/feedback was sought via a KCTMO
24 Roadshow ... and the issue of a questionnaire to
25 Grenfell Tower residents with a deadline return date of

42

1 9th March 2012."

2 Then it tells us, as at 22 March 2012, how many have
3 been completed, and then it actually sets out the
4 results below. Do you see that?

5 A. Yes.

6 Q. Question 2 is as follows, it says:

7 "Do you think Grenfell Tower would benefit from
8 thermal insulation cladding? This would have the effect
9 of making the building warmer in winter and cooler in
10 summer and would mean homes require less heating. It
11 would also improve the external appearance of the
12 building."

13 Do you see that there?

14 A. Yes.

15 Q. Were you aware that that question was part of that
16 March 2012 questionnaire?

17 A. I wasn't.

18 Q. No, okay.

19 Can you help us as to whether any information had
20 been given to residents prior to answering that question
21 about the thermal insulation cladding that might be
22 being proposed?

23 A. No, I think this questionnaire pre-dated our
24 involvement.

25 Q. Yes. So it wouldn't have been possible to give any

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1 details at that point of the specific insulation that
2 was being proposed by Studio E?

3 A. No.

4 Q. No.

5 Do you recall any discussions with residents at any
6 later stage about the specific type of insulation to be
7 used in the external wall?

8 A. I can't recall doing -- discussing it, no.

9 Q. No, okay.

10 Do you have any recollection of any discussions at
11 any time about fire safety more generally of the
12 materials to be used in the external overcladding?

13 A. No.

14 Q. No.

15 Then if we can go on to page 14 {RBK00000236/14},
16 this is a table setting out "Consultation summary". We
17 can see the heading, "Section 7: Consultation Summary"
18 above, and it's outlining a number of initiatives that
19 have occurred and what the feedback has been.

20 If we go on to page 15 {RBK00000236/15} we can see
21 a line for 26 July 2012. Do you see it says there:

22 "Evening consultation meeting, day time drop-in
23 sessions and Newsletter."

24 Then the topic was "Discussion with design
25 proposals" and the feedback says this:

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1 "External Canopy; Residents would like to see a new
2 canopy which offers protection and shelter around the
3 block. External cladding proposal favourable to
4 residents seem to be for profiled zinc. Although we
5 seem to have some feedback on type of cladding it's
6 still undecided on their preferred colour for the
7 cladding."

8 Do you see that there?

9 A. Yes.

10 Q. Can you help us, by this stage, as to what information
11 about the zinc external cladding had been provided to
12 residents in the context of these discussions?

13 A. Off-hand, I can't. I ... you have to go back on --
14 I would have to go back on -- based on the date, as to
15 what the board was that we presented that evening.

16 Q. Yes. So, just to be clear, it talks about an evening
17 consultation meeting; were you present there at that
18 evening consultation meeting?

19 A. I would need to check, but I probably was.

20 Q. Yes.

21 You just said "what board we were presenting"; can
22 you just explain to us what you would do at that evening
23 meeting or what you recall doing?

24 A. Well, there were a number of these meetings which had
25 slightly different formats. So often there was

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1 an address from Marc to an audience of residents, and
2 then that would have been followed by a walk-around. So
3 it was a kind of exhibition. We had our A1 boards on
4 easels so we could stand and talk to people.

5 Q. Yes, yes.

6 A. And both TMO and Studio E staff were present and could
7 talk people through what was presented --

8 Q. Yes.

9 A. -- on the boards.

10 Q. Yes.

11 Can you recall whether the residents were ever given
12 any information about the nature and composition of the
13 zinc external cladding?

14 A. As I say, I would have to check what was shown on that
15 board, but you did pick up a newsletter in yesterday's
16 session.

17 Q. Yes, I'm going to come to that in a moment, we will look
18 at that, where we see some details of the VMZinc,
19 I think, being provided.

20 A. Yes.

21 Q. Yes.

22 In your mind, what was the purpose of discussing,
23 for example, the zinc cladding proposals at that kind of
24 resident meeting? What were you seeking to get from it
25 in terms of the design process?

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1 A. The subject of colour and appearance in general was
2 always a sensitive one, and we were seeking to get
3 people on board with what we -- well, trying to get
4 a consensus, certainly with the residents, but also
5 within ourselves as to what we were going to present.
6 So we were putting proposals forward and seeing what
7 came back as to whether there was any strong push one
8 way or the other.

9 Q. Yes. So I think, to summarise, are you saying that what
10 you were seeking to get out of it was primarily about
11 the colour and appearance of the cladding to help you
12 with your design in that aspect?

13 A. Well, it was the whole thing. We presented
14 three-dimensional views of the building, but obviously
15 the cladding was a key part of it, but so were the
16 windows.

17 Q. Yes.

18 Now, after this, the document we're looking at, this
19 engagement statement, has a number of appendices which
20 contain relevant information about this engagement
21 that's summarised earlier in the document.

22 Can we look at appendix C on page 23
23 {RBK00000236/23}. These are minutes and notes from the
24 pre-planning meeting of 19 July. If we go to page 24
25 {RBK00000236/24}, which is page 1 of the minutes, if we

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1 can just expand the bottom of that page -- sorry, maybe
2 we should look at the top first, just to clarify what
3 this is. So it's minutes of a meeting, Grenfell Tower
4 regeneration project. It's at the RBKC Town Hall on
5 19 July 2012, and it's "LPA Pre-Application meeting", do
6 you see that there?

7 A. Yes.

8 Q. You're present. We can see that from the list.

9 A. Yes.

10 Q. Then if we can go down, there is a heading "Canopy and
11 Overcladding" that I just want to look at. We can see
12 in the middle of that page it says "BS", so that must be
13 you, Bruce Soune; is that correct?

14 A. Yes.

15 Q. "... explained that an overclad and rainscreen system is
16 being proposed zinc or eternit particle board are being
17 investigated (OK with EG but suggested that colour
18 choice should avoid grey)."

19 Can you help us as to what that means, "OK with EG"?

20 A. Edward George.

21 Q. Edward George, the planner?

22 A. I think he was the principal planner with engaged with
23 throughout.

24 Q. Then it says this in the next paragraph:

25 "Considering aluminium windows but still talking to

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1 residents about design considering safety etc.
 2 Considering ribbon approach to window design but depends
 3 on 'infill' panels."
 4 Do you see that there?
 5 A. Yes.
 6 Q. Do you know whether any details of the window infill
 7 panels were ever provided to the residents as part of
 8 this process?
 9 A. No, this was long before we were at stage E. This was
 10 stage C consultation, so we wouldn't have put technical
 11 detail forward anyway.
 12 Q. Just to be clear, I think it does follow from your
 13 answers earlier, but I want you to clarify, did any
 14 discussions occur about fire safety or fire performance
 15 of the external wall materials at this meeting?
 16 A. I do not recall that being discussed, no.
 17 Q. No.
 18 Then if we can go on to page 33 {RBK00000236/33} at
 19 appendix G, and this is newsletters. So this is the
 20 appendix with the newsletters, and if we look at page 34
 21 {RBK00000236/34}, we see the newsletter of 15 July 2012,
 22 and in the main part of that page we can see a heading
 23 "Feedback from Residents"; do you see that there?
 24 A. Yes.
 25 Q. Just looking for a moment at the black strip on the

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1 left, two paragraphs up from the bottom it says this:
 2 "KCTMO is seeking to work with residents and the
 3 community to develop the proposals for Grenfell Tower
 4 and has appointed the Studio E design team and
 5 contractor Leadbitter to deliver this project."
 6 Then it says:
 7 "KCTMO and RBKC wish to ensure that the regeneration
 8 of the tower delivers maximum benefit to the residents
 9 and community."
 10 Do you see that there?
 11 A. Yes.
 12 Q. Then in the middle column, at the bottom, under the
 13 heading "What you have said", you can see a heading that
 14 says:
 15 "You wish to be involved in the development of the
 16 proposals for Grenfell Tower."
 17 Do you see that there?
 18 A. Yes.
 19 Q. Was that something you were very aware of at the time of
 20 this engagement, that the community did want to be
 21 involved in the development of the proposals?
 22 A. I have looked at that -- those results of the May
 23 questionnaire and I think that was one of the
 24 questions --
 25 Q. Yes?

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1 A. -- supported that, yes.
 2 Q. Then on the right, we can see, four paragraphs down from
 3 the top, there's a sentence that said:
 4 "There is no clear opinion about the colour or type
 5 of external cladding."
 6 Do you see that there?
 7 A. Yes.
 8 Q. What did you understand type to mean? We have discussed
 9 colour already and that you were looking for feedback on
 10 that. What would you understand type to be meaning
 11 there?
 12 A. Alternative material.
 13 Q. Yes.
 14 A. I think that ... there was no -- they weren't giving
 15 a preference to any particular type of cladding.
 16 Q. Right. And you had given different options, had you, as
 17 part of your presentations? You had looked at different
 18 options?
 19 A. I would have to refer back to the boards, but I think we
 20 did.
 21 Q. Okay.
 22 Then look at page 36 {RBK00000236/36}. This is
 23 a newsletter of 22 July 2012. Under "Feedback from
 24 Residents" on the right-hand side there is a heading
 25 "External Cladding", and it says there -- so by this

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1 time, it looks like -- it says:
 2 "A wide variety of options have been presented and
 3 there is a strong preference for metal cladding:
 4 "1. Aluminium sheet.
 5 "2. Composite metal sheet.
 6 "3. Profiled Zinc sheet.
 7 "Further work is to be done on this and in
 8 particular possible colours."
 9 Do you see that there?
 10 A. Yes.
 11 Q. Then over on to page 37 {RBK00000236/37} of this same
 12 newsletter, right at the bottom of that page, it says:
 13 "We look forward to your feedback on ..."
 14 And then it's got external cladding as the second
 15 bullet, do you see that there?
 16 A. Yes.
 17 Q. Clearly it would appear that the consultation is
 18 carrying on and a variety of options have been presented
 19 and that there is a strong preference emerging for metal
 20 cladding. Was that your understanding?
 21 A. I think ... I think the boards were the primary form of
 22 presentation. I may have taken samples to these events,
 23 I can't recall, and I believe that people would be
 24 pointing at images of buildings with cladding on it,
 25 indicating a preference. So I'm not sure you would draw

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1 a conclusion that was a strong preference one way or the
 2 other.
 3 Q. Right.
 4 Can you remember -- you may not -- when the idea of
 5 aluminium sheet was first introduced in the context of
 6 those discussions?
 7 A. No. As I say, I suspect it relates to an image with
 8 a caption --
 9 Q. Right.
 10 A. -- saying "aluminium sheet", but I would ... I would
 11 want to check.
 12 Q. Yes.
 13 Then if we can go on to page 38 {RBK00000236/38} and
 14 look at the newsletter of 1 August, in the right-hand
 15 column, six paragraphs down, there is a question where
 16 it says:
 17 "Are leaseholders' concerns being taken into
 18 consideration?"
 19 It says:
 20 "We have engaged with a number of leaseholders on
 21 an individual basis and we have additionally offered to
 22 meet with the leaseholders collectively to explain the
 23 proposals that have been developed so far."
 24 Do you see that?
 25 A. Yes.

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1 Q. Do you know why it was that some leaseholders were
 2 engaged with on an individual basis?
 3 A. Well, obviously long leaseholders have ownership of
 4 their flat, and they can change it as they wish, and
 5 they may have had specific concerns that they wanted to
 6 raise directly with the TMO, who were effectively their
 7 landlord. But I don't recall exactly what those issues
 8 were.
 9 Q. From your point of view, were you aware that there had
 10 been engagement with a wider group, including tenants
 11 with shared common interests in the building? Had that
 12 happened as well?
 13 A. I think the -- all the residents engagement was open.
 14 It wasn't exclusive or broken down.
 15 Q. So are you saying anyone could have come along to the
 16 evening meetings or the drop-in sessions?
 17 A. Yes, yes, I believe it was advertised.
 18 Q. Then if we look at page 40 {RBK00000236/40} of this
 19 document, we can see some information which appears to
 20 have been attached to this 1 August 2012 newsletter. If
 21 we look at the bottom half of that page, we can see that
 22 there is a section "Zinc Cladding system and its
 23 advantages"; do you see that there?
 24 A. Yes.
 25 Q. Then we have some boxes and diagrams on the right. Some

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1 of these are familiar to us because I actually took you
 2 to some of this yesterday --
 3 A. Yes.
 4 Q. -- when we were looking at the VMZinc composite, and we
 5 see this is the one where it had reference to
 6 a high-density mineral-rich core combining the qualities
 7 of zinc, et cetera, with rigidity and flatness.
 8 Then in the little diagram on the right at point 2
 9 it has "polyethylene core FR (Fire Retardancy)"; do you
 10 see that there?
 11 A. Yes.
 12 Q. Now, in the light of that, can you recall on what basis
 13 this particular product and this particular detailed
 14 information on that product was being shared with
 15 residents?
 16 A. I can't remember the exact circumstances, but I think
 17 it's related to the image above, which is of a building
 18 clad in the same product, which we may have used, and
 19 that's -- in the presentation.
 20 Q. Right. So you can't help us as to why this particular
 21 product was being singled out to be included within this
 22 newsletter at this point?
 23 A. I can't remember exactly.
 24 Q. Can you remember whether it provoked any discussions?
 25 We see the reference there to "polyethylene core FR

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1 (Fire Retardancy)"; did that information that went out
 2 in that newsletter ever provoke any discussions about
 3 the FR fire retardancy of the core of the panel?
 4 A. No, not to my knowledge.
 5 Q. Finally on this document, before I ask you some
 6 follow-up questions, which we might do after the break,
 7 on consultation, I just want to finish going through
 8 this document.
 9 If we look at page 42 {RBK00000236/42}, and this is
 10 the newsletter of 9 August 2012, "Feedback from
 11 Residents", in the right-hand column it says, with
 12 reference to 26 July 2012 -- I think we have looked at
 13 this before, actually, "External Cladding proposal
 14 favourable to residents". I think we have considered
 15 that already, because we have looked at it earlier.
 16 Sorry.
 17 Mr Chairman, I think that probably would be a good
 18 moment for a break. I'm going to carry on with the
 19 resident consultation theme and just ask Mr Sounes about
 20 some emails after this.
 21 SIR MARTIN MOORE-BICK: Yes. Well, if that's a good point
 22 from your point of view, I think it's probably sensible
 23 to stop there.
 24 MS GRANGE: Yes, it is.
 25 SIR MARTIN MOORE-BICK: Mr Sounes, we're going to have

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1 a break at this point. I'm going to ask you to go with
 2 the usher in just a moment.
 3 Remember, please, not to talk to anyone about your
 4 evidence while you are out of the room. We will come
 5 back at 11.45, please.
 6 THE WITNESS: Okay.
 7 SIR MARTIN MOORE-BICK: Thank you very much.
 8 (Pause)
 9 11.45, then, please.
 10 MS GRANGE: Thank you.
 11 SIR MARTIN MOORE-BICK: Thank you.
 12 (11.30 am)
 13 (A short break)
 14 (11.45 am)
 15 SIR MARTIN MOORE-BICK: Right, would you ask Mr Sounes to
 16 come back, please. Thank you.
 17 (Pause)
 18 Ms Grange, before we continue, I understand that
 19 a number of people have been suffering problems with the
 20 receipt of the live transcript. Mine wasn't working but
 21 it may be working now, but I understand for some people
 22 receiving it elsewhere there have been difficulties.
 23 I'm sorry about that. The technical people are doing
 24 their best to resolve the problems, and I hope that they
 25 will succeed in doing that before very long.

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1 Right, are you ready to carry on, Mr Sounes?
 2 THE WITNESS: Yes.
 3 MS GRANGE: Thank you.
 4 Continuing with the theme of resident consultation,
 5 I now want to take you to a number of emails that are
 6 relevant to that topic and ask you some related
 7 questions.
 8 Can we look at a document, {RBK00000474}. So these
 9 are minutes of a meeting that you attended at RBKC on
 10 30 August 2012, housing digest meeting. Do you see that
 11 there?
 12 A. Yes.
 13 Q. Now, can you confirm that at this meeting with
 14 Councillor Coleridge, you told him and others that 80%
 15 of the residents were happy with the proposals, as
 16 recorded in the minutes.
 17 Can we just have a look in the minutes -- this is
 18 a question that's come in quite recently -- so if we can
 19 just look down to the next page, {RBK00000474/3}, under
 20 the heading it says:
 21 "Bruce Sounes from Studio E attended and gave
 22 a presentation ..."
 23 Do you see that there?
 24 A. Yes.
 25 Q. At the bottom after the bullets it says:

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1 "80% of the residents were happy with the
 2 proposals."
 3 Do you see that there --
 4 A. Yes, yes.
 5 Q. -- immediately after the bullet points?
 6 So can you confirm, first of all, that that's what
 7 you said at the meeting?
 8 A. I can't recall saying that. I might recall attending
 9 the meeting, a meeting. I mean, this was not a normal
 10 meeting for me to attend.
 11 Q. Yes. Can you recall the substance of the point? Can
 12 you recall being aware that as far as you were concerned
 13 80% of the residents were happy with the proposals?
 14 A. This is quite detailed, the discussions about the
 15 proposals. I'm struggling to remember that.
 16 Q. Okay.
 17 A. So I would also struggle to remember the "80% of
 18 residents" item.
 19 Q. Can you help us as to where that 80% figure might have
 20 come from and how that was arrived at?
 21 A. No.
 22 Q. No, okay.
 23 Can we now look at an email that we looked at
 24 yesterday, which came up in the chronology of the ACM
 25 story. This is at {SEA00003965}, and if we can look at

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1 the bottom of page 1, this was the email that you sent
 2 to Mr Blades on Tuesday 10 April in anticipation of what
 3 appeared to be a meeting at site.
 4 A. Yes.
 5 Q. Do you remember there's that paragraph there about, "It
 6 is important to be discreet while we are there"? This
 7 is at the end of the page:
 8 "... as the political context for the development
 9 and the development of the adjoining site is very
 10 sensitive. I would refrain from discussing with
 11 residents or staff who you might meet, or discussing
 12 drawings where anyone can see them. There is enough
 13 misinformation about on the estate and we don't want to
 14 add to it unwittingly."
 15 Do you see that there?
 16 A. Yes.
 17 Q. Now, in the light of all the resident engagement work
 18 that we have just been discussing and the stated
 19 intention of that engagement work, the question is: can
 20 you explain here how your comments are compatible with
 21 the aim to be having positive engagement with the
 22 community and stakeholders at this time?
 23 A. I don't see them as incompatible at all. We were
 24 employed by RBKC to assist in the design of the
 25 refurbishment and this is, I think, a week or two

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1 into -- or a month into the project, and I have been
 2 warned off speaking even to TMO staff about the
 3 proposals. I hope you can pull up Mark's email --
 4 Q. I've got that, I can take you to that in a moment.
 5 A. -- which, as far as I recall, is the source of my
 6 comments here.
 7 Q. I see. Yes, you referred to this yesterday, and I think
 8 we have found it overnight. {SEA00003591/2}, at the
 9 bottom of the page, this is an email from Mark Anderson
 10 to you a month earlier of 5 March 2012, where he says:
 11 "Good morning Bruce."
 12 And then in the second line of the email:
 13 "You are not under any circumstances to make contact
 14 with Robert Regan or the other Estate Inspectors.
 15 "Requests for information are to be directed to
 16 myself copied to Alasdair and Siobhan.
 17 "Please let me know what floor plans you require."
 18 Is that the email you were referring to?
 19 A. Yes, and we -- I think I would have spoken to Mark after
 20 that correspondence.
 21 Q. What did you discuss with him after this?
 22 A. No, I can't remember. What I mean is we would have
 23 discussed this item, the sensitivity around what the TMO
 24 wanted to be known, in other words how they went about
 25 engaging with the community. It wasn't something they

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1 wanted to leave to a chance encounter on site.
 2 Q. I see.
 3 What messages did you get from those discussions?
 4 What did you come away thinking in the light of those
 5 discussions?
 6 A. Just to be careful. I didn't entirely understand the
 7 role of the estate inspectors on site, I didn't
 8 understand the sensitivity they specifically had.
 9 Q. Did you ever think to yourself during the project,
 10 "Well, that's not very consistent with what I'm also
 11 being told about community engagement and engagement
 12 with stakeholders?"
 13 A. No. I don't ... I don't think that's fair. I think
 14 there was ample opportunity to engage all parties, and
 15 what I didn't -- was obviously wary about is somebody
 16 who I didn't know who might say something which could be
 17 misinterpreted --
 18 Q. Right.
 19 A. -- on site, and there were a lot of -- there was
 20 a strong possibility he would be noticed on site.
 21 Q. Yes. If we just look at the top of this email string,
 22 at the top of page 1 {SEA00003591/1} there is another
 23 email from Mr Anderson on 5 March 2012 to you, and he
 24 gives a bit more explanation, he says:
 25 "Robert is a TMO employee and I wish to ensure that

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1 we manage the dissemination and sources of information."
 2 Do you see that there?
 3 A. Yes.
 4 Q. So did you feel at the time that the TMO was taking
 5 a close interest in managing the dissemination of
 6 information about the project?
 7 A. That's certainly reflected in that. I wasn't entirely
 8 clear of the reasons.
 9 Q. Did that actually affect you in terms of what Studio E
 10 were able to do in terms of community engagement? Did
 11 that have a knock-on effect in terms of what you were
 12 then doing?
 13 A. I don't believe it had any impact on our formal or
 14 informal engagements, no.
 15 Q. I have a number of emails to show you. This is forward
 16 in time to 5 July 2012, if I can go to {IBI00000048}.
 17 This is an email from Marc Watterson, the planning
 18 consultant, is that right?
 19 A. Yes.
 20 Q. To you, Studio E Architects, and he says:
 21 "Further to our earlier conversation re the
 22 progression of the refurbishment ..."
 23 Then I want to pick up on what he says in
 24 paragraph 2:
 25 "I will seek a meeting with the Planning Officer,

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1 aiming for Thursday 19th July. We will have been
 2 informed by the first rounds of consultation at this
 3 stage so we will have a clearer idea of the residents'
 4 views. I would suggest that a series of these meetings
 5 will be needed to agree the design prior to the
 6 submission of the application."
 7 Then he says this in paragraph 3:
 8 "I would recommend that it would be beneficial
 9 investing time now to ensure that residents are on-side
 10 as much as possible prior to the submission of the
 11 application. This will help to reduce the risk of
 12 judicial review and is of course best practice. I would
 13 suggest that at this stage, this consideration should be
 14 as much of a driver on the application submission
 15 programme as the projected start on site date."
 16 Do you see all of that?
 17 A. Yes.
 18 Q. Did you understand in that third paragraph what he meant
 19 by "reducing the risk of judicial review"? Did you
 20 understand what that meant?
 21 A. Yes.
 22 Q. Why did you think that -- or why do you think the risk
 23 of judicial review was a factor on this project? Is
 24 that something you thought was a legitimate concern?
 25 A. It's a factor on all projects, to be honest. That meets

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1 any kind of local opposition. It is a factor.
 2 Q. Yes.
 3 What did you understand him to mean by -- he talks
 4 about it being beneficial, in that first line of
 5 paragraph 3 -- "beneficial investing time now to ensure
 6 that residents are on side as much as possible"? What
 7 do you understand "on side" to mean?
 8 A. To win support from the residents for the proposals.
 9 Q. Did you ever feel during the process that the aim of the
 10 consultation was merely to persuade residents round to
 11 the TMO's ideas of what it wished to achieve, rather
 12 than to provide an opportunity to respond genuinely to
 13 what the residents wanted? Did you ever feel that
 14 during the process?
 15 A. I think that's putting it a bit simplistically. The
 16 focus of the investment was on the infrastructure, and
 17 the TMO were taking seriously the input of their
 18 residents. That's how I took it.
 19 Q. Okay.
 20 A. There was, I felt at the time, considerable effort put
 21 into gathering input on the various items.
 22 Q. Yes.
 23 Now, if we can go forward in time again, on
 24 20 August 2012 -- if we can look at an email,
 25 {TMO10037758/2}, there is an email at the bottom there

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1 from Peter Martindale. Can you explain what his role
 2 was on the project? It's an email to you.
 3 A. I don't recall his role. In fact, I knew him as
 4 Peter Martin. Sorry, "Martindale" is unusual, to see it
 5 like that. He was a Studio E employee, yes. I can't
 6 remember what his role was.
 7 Q. So he was a Studio E employee, that was your
 8 recollection?
 9 A. This -- no. I'm not sure. The email has been redacted.
 10 Q. Yes.
 11 Let's look over the page, to see if there is
 12 anything at the bottom of the email. {TMO10037758/3}.
 13 No, that doesn't help.
 14 If we look at, I want to look at paragraph 4,
 15 subparagraph 4, I'm looking for a paragraph -- I'm not
 16 sure that's the reference. No, I can't see that there.
 17 Let's come back to this email another time if we need
 18 to.
 19 Can I ask you, then, finally on this topic, can we
 20 look at an email chain at {SEA00006493}. This is
 21 an email, if we zoom in at the top of the page, this is
 22 an email from Neil Crawford to Ben Rogerson of Exova on
 23 5 November 2012, so forward in time again, and cc --
 24 you're cc'd in to it, Bruce Sounes, do you see that
 25 there?

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1 A. Yes.
 2 Q. This was explored in Mr Crawford's evidence, but I want
 3 to just explore it briefly with you, since you were
 4 copied in. He states:
 5 "Can you help with the query below from Colin Chiles
 6 at Leadbitter. As I understand Colin has been
 7 challenged by one of the residents that the current
 8 redesign of the landscape surrounding Grenfell Tower
 9 compromises the fire access to Grenfell Tower (the
 10 individual concerned is a known trouble maker)."
 11 Do you see that there?
 12 A. Yes.
 13 Q. Did you have any concerns when you were copied in to
 14 this email about the reference there to "a known
 15 troublemaker"? Did that come to your attention? Do you
 16 remember noticing that?
 17 A. I appreciate I was copied on, and it did overlap with
 18 Grenfell, but I don't recall --
 19 Q. Do you remember -- sorry.
 20 A. I don't recall the email at the time.
 21 Q. Okay.
 22 Do you ever remember discussing this topic with
 23 Mr Crawford, the fact that there had been concerns
 24 expressed by one of the residents about the landscape
 25 surrounding and the fire access being compromised, or

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1 the individual being a known troublemaker? Do you ever
 2 recall any discussions with Mr Crawford about that?
 3 A. I think the issue of the access around the tower came up
 4 time and again, that's reflected in the correspondence,
 5 but I can't recall that in the context of any
 6 troublemakers here, no.
 7 Q. Right, yes.
 8 Do you agree, looking at this email now, that the
 9 topic that appears to have been raised was a wholly
 10 legitimate one to be concerned about, given the
 11 importance of firefighting access to a building like
 12 Grenfell Tower?
 13 A. I think it was raised, from the outset, yes, I agree.
 14 Q. It's a legitimate topic to be concerned about, isn't it?
 15 A. Yes.
 16 Q. Do you think that emailing in these terms -- and really
 17 it's a reference to "the individual concerned is a known
 18 troublemaker" -- do you think that's compatible with
 19 a positive attitude towards resident engagement and
 20 consultation?
 21 A. It's copied to consultants. Neil wasn't involved in the
 22 consultation. I don't think it's relevant.
 23 SIR MARTIN MOORE-BICK: I am wondering if that's a matter
 24 for Mr Sounes anyway.
 25 MS GRANGE: I agree.

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1 SIR MARTIN MOORE-BICK: He didn't write this.
 2 MS GRANGE: I agree. I'm not going to pursue it any
 3 further, thank you.
 4 Mr Sounes, I now want to turn to the topic of cavity
 5 barriers and ask you some questions about the design of
 6 the cavity barriers in the façade.
 7 Now, turning first to the requirement of the
 8 Building Regulations, were you aware at the time of this
 9 project of the B3.(4) requirement, "The building shall
 10 be designed and constructed so that the unseen spread of
 11 fire and smoke within concealed spaces in its structure
 12 and fabric is inhibited"? Was that something you were
 13 aware of?
 14 A. The principle I was aware of, yes.
 15 Q. Yes. Can we have a look at section 9 of Approved
 16 Document B. So if we go, this is {CLG00000173}, this is
 17 the 2006 edition of ADB with 2010 amendments, so this
 18 what would have been available in 2012. I want to look
 19 at section 9 on page 82 {CLG00000173/82}. 9.1, it
 20 states:
 21 "Concealed spaces or cavities in the construction of
 22 a building provide a ready route for smoke and flame
 23 spread. This is particularly so in the case of voids
 24 in, above and below the construction of a building, eg
 25 walls, floors, ceilings and roofs. As any spread is

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1 concealed, it presents a greater danger than would a
 2 more obvious weakness in the fabric of the building."
 3 Do you see that there?
 4 A. Yes.
 5 Q. Were you aware of that guidance in Approved Document B
 6 on concealed spaces and cavities when you were designing
 7 the Grenfell project?
 8 A. Yes, I was.
 9 Q. Did you appreciate that the construction of the new
 10 façade would create a number of additional cavities?
 11 A. Yes.
 12 Q. Did you appreciate that there was a risk of fire spread
 13 within those cavities?
 14 A. Yes.
 15 Q. Now, Approved Document B also gives some guidance on the
 16 location of cavity barriers. If we can look at 9.2 on
 17 that same page, guidance there is to provide cavity
 18 barriers -- and I'm just paraphrasing here -- to
 19 subdivide the cavity where there would otherwise be
 20 a pathway around the fire separating element, ie at
 21 compartment walls and floors.
 22 This is illustrated in diagram 33, which appears on
 23 this page below, if we can have that diagram up on the
 24 page. Do you recall ever looking at this diagram during
 25 the time you worked on the Grenfell project?

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1 A. I think you asked me on my second day whether I had read
 2 part B in the context of this project, and I said no,
 3 but I didn't go on to explain why.
 4 Q. Okay.
 5 A. Part B is guidance.
 6 Q. Yes.
 7 A. And in the experience I've gained in 20 years, I've
 8 generally found it very difficult to form any definitive
 9 interpretation from the guidance.
 10 Q. I see.
 11 A. So I may have looked at this during the course of the
 12 projects, but I wouldn't have looked at it as the person
 13 considering the design; I might have looked at it with
 14 either Adrian or Tomas, as they were reviewing these
 15 details.
 16 Q. I see. So even though this was a kind of project that
 17 you have never done before, a high-rise overcladding
 18 project, it didn't occur to you that it might be a good
 19 idea to go back and look at key provisions of ADB,
 20 including this one?
 21 A. Well, I believe Tomas did. He, if not directly,
 22 certainly in connection with his conversations with
 23 suppliers, as to whether the products were -- how they
 24 should be used.
 25 Q. But I'm asking about you yourself.

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1 A. I personally wasn't working in that way on the project.
 2 I wasn't sitting down, preparing drawings and
 3 specifications.
 4 Q. Okay.
 5 Now, we can see from diagram 33, it's in little grey
 6 shading, with the label at the bottom "Cavity barrier",
 7 that it's suggesting cavity barriers at the top of the
 8 cavity. Do you see that there, "Close top of cavity"?
 9 A. Yes.
 10 Q. It's suggesting them within the cavity at compartment
 11 floor line; do you see that there? There is a little
 12 grey shading.
 13 A. Yes.
 14 Q. It's also showing cavity barriers around the windows.
 15 Can you see that?
 16 A. Yes.
 17 Q. It's got a specific diagram, "Close around openings".
 18 Do you see that there?
 19 A. Yes. Yes.
 20 Q. Then it's also got some guidance about firestopping in
 21 the green.
 22 Can we move on to look at the next page of ADB at
 23 page 83, {CLG00000173/83}. At paragraph 9.3, the
 24 guidance states that:
 25 "Cavity barriers should be provided to close the

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1 edges of cavities , including around openings."
 2 So would you agree with me that this guidance is
 3 very clear about the need for cavity barriers around
 4 openings?
 5 A. Not in the context of a rainscreen façade, no,
 6 I wouldn't agree.
 7 Q. Okay. What was it about these provisions of ADB that we
 8 have just looked at that would suggest to you that in
 9 a rainscreen cladding system you wouldn't have to
 10 provide cavity barriers around openings?
 11 A. Well, the approved document is silent on rainscreen, it
 12 doesn't discuss it, but I believe the diagram 33 refers
 13 to a very conventional form of construction and not
 14 a rainscreen, which is essentially outside; the cavity
 15 is outside, it's vented -- pressure equalised, if you
 16 like -- it doesn't offer any resistance to flame from
 17 the outside or flames coming around the window opening.
 18 Q. I see.
 19 A. So I couldn't have -- I would have read that as unclear.
 20 Q. Okay. Does that mean that it was your understanding
 21 that you thought that you didn't need to provide cavity
 22 barriers around openings in this kind of rainscreen
 23 cladding system?
 24 A. I would have done what I believe Tomas did, and he would
 25 have consulted as to --

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1 Q. Consulted who?
 2 A. I'm not sure who he consulted, but I know that he was
 3 speaking both to Exova, Siderise and Harley. I'm
 4 obviously not clear on what his -- who he spoke to, and
 5 maybe we'll not know, but I know he did spend time
 6 trying to arrive at a solution.
 7 Q. Can I just focus on your own knowledge at this point?
 8 A. My own knowledge was him summarising it to me.
 9 Q. No; was your understanding, your own understanding, that
 10 you didn't have to provide cavity barriers around window
 11 openings?
 12 A. I had never seen one around an opening, cavity barrier
 13 around a rainscreen façade, no. I regarded it as
 14 outside. Those drawings that we forwarded last year
 15 included a clutch from CGL, I think Rheinzink and KME,
 16 and there are no cavity barriers around openings.
 17 Q. I see. Did you ever consult any guidance to inform you
 18 about your own knowledge on this topic, or ask anybody
 19 else, any other outside parties about whether --
 20 A. I believe Tomas was dealing with it, and he consulted.
 21 Q. So does it amount to this: that you basically left it to
 22 Tomas to work out what the cavity barrier arrangement
 23 was?
 24 A. He came back to me with his conclusion, and I agreed it.
 25 Q. When he came back to you with his conclusion, did he say

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1 to you, "I'm only going to put the cavity barriers at
 2 compartment floor, I'm not going to put them around the
 3 windows, I think this is acceptable because ..."? Did
 4 you have that discussion with him?
 5 A. I repeat, I haven't seen a cavity barrier on a detail
 6 around a window. I don't recall it being discussed.
 7 Q. I think you have just answered that you don't recall
 8 that being discussed; is that correct?
 9 A. Correct, yes.
 10 Q. So when you said, "Tomas came back to me with it and
 11 I agreed", what did he come back to you about and what
 12 did you agree?
 13 A. The location of cavity barriers on the typical bay
 14 drawing.
 15 Q. I see. So you looked at his drawings on that, and you
 16 didn't have a problem with where he put cavity barriers?
 17 A. I thought they were consistent with the -- my
 18 understanding of part B in terms of protecting the
 19 concealed spread of fire.
 20 Q. Yes. Mr Crawford said in his evidence -- this was
 21 {Day9/163:4-8}, for the transcript -- he was asked:
 22 "Question: Did Mr Sounes tell you that in the
 23 cavity barrier scheme there was not to be a cavity
 24 barrier around the windows?
 25 "Answer: My understanding from the discussion with

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1 him was that there wasn't a requirement for a cavity
 2 barrier around the windows."
 3 Do you recall having those discussions with
 4 Mr Crawford?
 5 A. No, I don't.
 6 Q. So you don't recall saying to him that there wasn't
 7 a requirement for cavity barriers around the windows?
 8 A. I don't recall that specific topic, no.
 9 Q. Do you recall having any discussions with Mr Crawford
 10 about the cavity barrier arrangement?
 11 A. Yes. I know that that came up in the conversation, the
 12 email exchanges with Exova, September 2014 and
 13 March 2015. I was aware of them at the time. But
 14 not -- they were referring to the cavity barriers at the
 15 compartment lines.
 16 Q. Yes. The stage D report prepared by Studio E which is
 17 dated August 2013 doesn't address cavity barriers
 18 anywhere in it; that's right, isn't it?
 19 A. Yes.
 20 Q. In your experience, is it common for details such as
 21 cavity barriers to be addressed in the design at a later
 22 stage?
 23 A. Yes, it's fair.
 24 Q. Do you remember, at the stage D stage, ever addressing
 25 your mind at the time as to whether or not to carry out

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1 some initial design work on cavity barriers?
 2 A. Stage D?
 3 Q. Yes.
 4 A. No. I ...
 5 Q. Had you actually done, you or to your awareness anyone
 6 else at Studio E, ever done any work on cavity barriers
 7 at that stage?
 8 A. I believe we had, but this is based on documents in our
 9 system.
 10 Q. Your belief at the time was based on what?
 11 A. No, my -- at the time I wasn't necessarily aware of it,
 12 but I believe, looking back at the documents on our
 13 system, that we were looking at the cavity barrier
 14 issue --
 15 Q. Who was doing that?
 16 A. That would have been Adrian Jess.
 17 Q. But that was not something you were involved in?
 18 A. Stage D obviously encompassed a period of hiatus,
 19 a stand-down from roughly December 2012 to I think
 20 June 2013, during which time I believe Adrian did do
 21 some work on that.
 22 Q. Let's move forward to the tender stage and the
 23 preparation of the tender documentation between
 24 August 2013 and January 2014. Can we look at what you
 25 say in your witness statement about this. This is

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1 {SEA00014273/112}. This is paragraph 267, it starts
 2 right at the bottom of that page, and you say there:
 3 "I have no recollection of how the judgement as to
 4 the placement of cavity barriers on the Typical Bay
 5 Drawing was arrived at. I note that cavity barriers are
 6 not shown on the draft Typical Bay Drawing dated
 7 24 September 2013, which states 'provision of cavity
 8 fire barrier TBC' ..."
 9 Do you see that there?
 10 A. Yes.
 11 Q. I want to focus on that very first sentence, that you
 12 say you have no recollection about how the decision
 13 about where to install cavity barriers was arrived at.
 14 Is it right that at that tender stage you were still
 15 taking the lead on the design within Studio E?
 16 A. I was still leading on the project, yes. Yes.
 17 Q. Does it remain your evidence that you are unaware as to
 18 how the cavity barrier arrangement was arrived at, at
 19 tender stage?
 20 A. I am unaware, I was unaware of the conversations that
 21 led to those positions indicated.
 22 Q. I see.
 23 Can we just look at a drawing, this is
 24 {SEA00002499}, and we will need the offline version.
 25 Thank you.

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1 A. I should clarify. I was -- I cannot recall who -- where
 2 the discussion came from. Tomas may have mentioned it,
 3 but I cannot recall.
 4 Q. So you're saying he might have mentioned to you --
 5 A. Who he had been consulting, yes.
 6 Q. But you can't recall any discussion with him about that?
 7 A. Specifically who he spoke to, I cannot recall.
 8 Q. Okay.
 9 This drawing, in the bottom right-hand corner it's
 10 dated 24 September 2013, and it was a drawing that was
 11 included as part of the employer's requirements package,
 12 it's number 1279 (06) 110, and I want to look at the
 13 right-hand side of the drawing, right at the top, that
 14 proposed section typical bay, if we can zone in on that
 15 as much as possible.
 16 At the top of that, if we look at the fourth tag
 17 down, "Ensure horizontal and vertical cavity barriers
 18 meet tightly"; do you see that there?
 19 A. Yes.
 20 Q. At the bottom of that, one tag up, we see also "Cavity
 21 fire barrier in line with compartment floor structure";
 22 do you see that there?
 23 A. Yes.
 24 Q. Again both under P10/435. So this is showing
 25 an arrangement where we've got cavity barriers along the

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1 line of compartment floors; is that correct?
 2 A. Yes.
 3 Q. It does not show any cavities around the windows, does
 4 it? Certainly none at the cill level?
 5 A. Correct.
 6 Q. Did you notice that at the time these drawings were
 7 being prepared?
 8 A. No.
 9 Q. Can you help us as to precisely why the arrangement is
 10 as it is on this drawing, with nothing at cill level?
 11 A. I repeat, I understood the purpose of the cavity
 12 barriers was to limit the spread of fire within the
 13 cavity. The cavity was outside, so I did not think that
 14 there was any reason to -- well, I know I'm putting
 15 words -- I'm inventing it. I do not recall seeing there
 16 to be a need for a cavity barrier under the window.
 17 Q. No. At the time, do you know if it was intended that
 18 that cavity barrier at the compartment floor line at the
 19 head of the window should also act as a barrier to
 20 inhibit the passage of fire into the cavity of the
 21 external wall in the first place? Do you know whether
 22 that was the intention?
 23 A. My understanding, which is reflected on this drawing, is
 24 that the cavity was outside, so the barrier only happens
 25 to offer protection; any flame exiting the window would

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1 find its way into the cavity .
 2 Q. So you weren't aware of guidance at the time of the
 3 importance of preventing the flame from entering the
 4 cavity around the sides of the windows and getting into
 5 that cavity in the first place?
 6 A. I don't think that's clear in section 9.
 7 Q. You don't think that's clear in section 9?
 8 A. No.
 9 Q. Okay.
 10 A. No, that diagram reflects the conventional cavity
 11 construction, whether it be timber frame or masonry.
 12 Q. So where section 9 refers to "cavity barriers around
 13 openings", what wasn't clear about that?
 14 A. That cavity I interpret as an internal space, which
 15 therefore has some degree of protection or concealment
 16 of flame, whereas, you know, in a rainscreen the façade
 17 is external.
 18 Q. Did you ever check your interpretation of that with
 19 Exova?
 20 A. No. Well, not me, no.
 21 Q. Can we go to your statement again at paragraph 267,
 22 {SEA00014273/113}. At the end of that paragraph, at the
 23 top of the page, you say this in the final lines :
 24 "Given the level of detail on the latter drawing,
 25 such as the reference to the 25mm gap on the horizontal

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1 barrier being consistent with the Siderise cavity
 2 barriers that I believe were installed, I believe that
 3 the location of the cavity barriers must have been
 4 determined with specialist input."
 5 Do you see that?
 6 A. Yes.
 7 Q. Now, do you mean that in your view there is a high level
 8 of detail on the drawing?
 9 A. Clarity, there is some clarity on the proposal, yes.
 10 I wouldn't say a high level of detail, but there is
 11 clarity .
 12 Q. When you say there "it must have been determined with
 13 specialist input", do you know who provided that
 14 specialist input?
 15 A. Siderise, or Lamatherm I think was the name that we had,
 16 were specified.
 17 Q. I'm talking about whether they were actually consulted
 18 and asked about this. Do you know that Siderise were
 19 consulted at the tender stage about this arrangement, or
 20 are you just assuming from the fact that you have
 21 specified in the NBS Siderise cavity barriers that they
 22 were?
 23 A. I recall discussing, or I recall Tomas discussing this
 24 with me, and him having consulted others. I repeat,
 25 I couldn't remember exactly whom he had discussed this

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1 with, or whether more than one. My understanding now is
 2 that he would have consulted with Siderise, but that's
 3 based on --
 4 Q. It's right, isn't it, that we haven't found any emails
 5 or written record of such a consultation occurring?
 6 A. No, and I can't obviously confirm what Tomas did,
 7 I don't believe I was in the office .
 8 Q. I'm going to put it to you that because the guidance in
 9 Approved Document B about providing cavity barriers
 10 around openings is clear, that specialist input should
 11 not really have been necessary at that tender stage; it
 12 should have been obvious that cavity barriers should be
 13 put round the windows?
 14 A. I obviously have given this a lot of thought, and I did
 15 watch Professor Luke Bisby's testimony, so I tend to
 16 agree, to achieve what the -- I agree with him that
 17 I can't see how you achieve what's required where you
 18 have to provide a half hour in both directions when you
 19 are supporting the window with aluminium. So I don't
 20 think, with hindsight, I don't think I agree that it was
 21 clear on a rainscreen what the intention was in the
 22 document.
 23 Q. Okay. Can we go back to the drawing that we were just
 24 looking at, {SEA00002499}, and I want to look instead at
 25 the elevation of the façade that we see on the top left .

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1 Now, it's right, isn't it, that that's not marked up to
 2 show where cavity barriers should be located, is it?
 3 A. The elevation?
 4 Q. Yes.
 5 A. No.
 6 Q. No.
 7 I want to show you some drawings in Mr Hyett's
 8 report on this topic. Can we go to {PHYR0000003/44} and
 9 look at figure 3.16, if we could blow that up. This is
 10 the first in a series of drawings in which he shows
 11 elevations of the façade and what the scheme of cavity
 12 barriers in his view should have been.
 13 He has done that for a series of elevations. We can
 14 see that, for example, if we go on at page 45
 15 {PHYR0000003/45} and page 46 {PHYR0000003/46} within
 16 this, look at different, he calls them conditions,
 17 different parts of the façade which had different
 18 configurations, and he is showing in an elevation where
 19 the cavity barriers should be.
 20 Can you just explain -- it's a general question --
 21 why you didn't produce similar drawings at tender stage
 22 clearly showing the elevations of the tower and where
 23 the cavity barriers were required?
 24 A. We didn't think they would be necessary for the tender.
 25 Q. Do you agree that that would have been a relatively

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1 straightforward exercise to do?

2 A. I think it would have stepped into the stage F stage of

3 the RIBA plan of work, where you are dictating what you

4 want the contractor to do; in other words, you're taking

5 a traditional line on information and design.

6 Traditional line as in the architect instructs and the

7 contractor constructs.

8 Q. I see. When you were saying F stage, you mean --

9 A. RIBA stage F.

10 Q. -- F after tender? Because remember we were looking at

11 a drawing, the drawing I showed you was part of the

12 employer's requirements.

13 A. Yes.

14 Q. So it would be after the technical design stage,

15 stage E?

16 A. No, F is technical design, so this level of commitment

17 to a scheme to me would fall more obviously into

18 a stage F.

19 Q. I see.

20 At the time you were working on the tender or

21 overseeing what was being done on the tender, did you

22 personally look at any information on the Siderise

23 website about where cavity barriers should be installed

24 in a rainscreen cladding system?

25 A. No, I didn't.

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1 Q. Did you know that they have a video available which very

2 clearly shows this?

3 A. No.

4 Q. Do you know if anyone else at Studio E consulted the

5 Siderise product brochure to see where they advise

6 cavity barriers should be located?

7 A. We have just the one Siderise document on file, which

8 discusses the horizontal and vertical products, but not

9 detail on their location, no.

10 Q. Okay. Now I want to turn to what the NBS specification

11 said about cavity barriers. Can we go to

12 {SEA00000169/246}. If we can look at item 435, is that

13 on that page? Is that all that's shown on that page?

14 At item 435, Studio E specified Lamatherm

15 horizontal --

16 SIR MARTIN MOORE-BICK: Do you want to get that up?

17 MS GRANGE: I can. I'll just get the reference.

18 SIR MARTIN MOORE-BICK: Otherwise it's a bit hard to follow.

19 MS GRANGE: I understand. There it is. Thank you.

20 So this is item 435, ventilated cavity barriers, and

21 we can see that the product reference, a few lines down,

22 is said to be Lamatherm horizontal and Lamatherm

23 vertical. Do you see that there?

24 A. Yes.

25 Q. Those were Siderise products; is that correct?

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1 A. Yes. This was the datasheet we have on our record,

2 which I believe is -- was saved earlier in the year, and

3 that's why I believe Adrian Jess may have done some

4 research.

5 Q. Yes. Then if you look a few bullets from the bottom,

6 it's got a heading "Fire resistance rating", and it says

7 "30/30". Do you see that there?

8 A. Yes.

9 Q. Now, we know the minimum performance standard in

10 Approved Document B was 30 minutes' insulation and

11 15 minutes' integrity. Does the 30/30 here refer to

12 insulation and integrity?

13 A. That's -- that would be my reading.

14 Q. Is it right that the cavity barriers actually exceed the

15 minimum performance standard, if looking at the guidance

16 in Approved Document B?

17 A. Yes.

18 Q. Were you aware of that at the time?

19 A. No.

20 Q. No. The specification also says, "Installation

21 requirements", two items down from that. So just one up

22 from the bottom, "Installation requirements", it says:

23 "Continuous with minimum joints."

24 Do you see that there?

25 A. Yes.

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1 Q. Was it meant by that that there should be no breaks in

2 the horizontal cavity barriers?

3 A. Yes.

4 Q. Did you give any consideration at this stage to how

5 cavity barriers would interface with any cladding rails

6 that were used?

7 A. At this stage, I think we were looking at a sort of

8 helping hand bracket, they call it a T bracket, which

9 would not normally conflict with -- they're spaced out

10 so they wouldn't normally conflict with barriers.

11 Q. I see, so was it something you were generally aware of,

12 that there was a need to make sure that the bracketry

13 for the cladding panels didn't interfere with the

14 continuous nature of the cavity barriers?

15 A. You appreciate the design that Tomas prepared, the

16 drawing that Tomas prepared is not based on a -- on what

17 was built. It's based on a simpler system, with

18 brackets that I believe could have avoided any conflict

19 or clash with the cavity barriers.

20 Q. Okay.

21 Do you know whether any research was done at this

22 stage about any test certification that supported the

23 use of these barriers in a rainscreen system?

24 A. No.

25 Q. Did you or anyone else to your knowledge at Studio E

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1 discuss the suitability of these cavity barriers in
 2 a rainscreen system with the manufacturer, with
 3 Siderise?
 4 A. I'm not -- I did not have those conversations, so I'm
 5 not aware of them, but I believe they must have
 6 happened, but I don't know.
 7 Q. Did it ever occur to you that in the event of a fire the
 8 ACM might buckle and provide a route for fire to spread
 9 within the cavity, notwithstanding the presence of
 10 cavity barriers?
 11 A. That doesn't quite make sense. If the cladding has
 12 buckled, it's created a void which would be outside --
 13 Q. Yes, and there is no hard surface for the cavity
 14 barrier, the intumescent to expand and seal, is there?
 15 A. It's outside, yes.
 16 Q. Yes.
 17 A. And that ... my understanding is that -- the degree of
 18 protection that the barrier offers is only until the
 19 cladding fails.
 20 Q. Can we move forward in time to a query that was raised
 21 by Harley much later on in the project, in March 2015.
 22 Can we go to {SEA00012906}. If we can blow up the top
 23 of that, what we can see is that on 6 March 2015 there
 24 is an email from Neil Crawford to Kevin Lamb and
 25 Simon Lawrence -- Kevin Lamb was doing work at that time

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1 for Harley; Simon Lawrence for Rydon -- copying you in
 2 and others. He says:
 3 "Hi Kevin
 4 "As per telephone conversation I have asked the
 5 question of Exova on the fire break but not had anything
 6 back. To me the fire breaks would have to follow the
 7 ratings of the party walls which are shown on the fire
 8 plan attached. You can see some of the low level
 9 apartments are separated by 120mins and others by
 10 60mins."
 11 Do you see that?
 12 A. Yes.
 13 Q. Attached to that is a fire strategy drawing. Do you
 14 remember looking at the drawings that were attached to
 15 this email at the time?
 16 A. No. No.
 17 Q. So you didn't --
 18 A. I was copied in as being notionally still the project
 19 lead, but Neil was fronting it.
 20 Q. So does that mean that you wouldn't have looked at those
 21 drawings and noticed that there were no cavity barriers
 22 at the head, jamb or cill of the windows in those
 23 drawings?
 24 A. No, I wouldn't have scrutinised an email which was
 25 copied to me for information.

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1 Q. Okay.
 2 Can we go back to {SEA00012906}. So Mr Crawford is
 3 saying there that he's asked the question of Exova on
 4 the firebreak but not had anything back.
 5 Now, just to put this in context in terms of time
 6 again, the NBS specification was dated January 2014.
 7 Can you explain why it was that in March 2015 the
 8 question of the fire resistance of the cavity barriers
 9 was still outstanding?
 10 A. I think this pertains to Neil's evidence as to the RFI
 11 that Harley raised and the conversations that ensued.
 12 Q. Yes. Did this not alert you to the fact that Exova's
 13 advice was unfinished or incomplete on the external
 14 wall, the fact that this query was being raised?
 15 A. At the time that -- no. I understood that there was
 16 a discussion going on. That's all I -- that's all
 17 I recall.
 18 Q. Did you know at the time that the question had been
 19 asked of Exova but they hadn't had anything back yet?
 20 A. No.
 21 Q. This didn't prompt you to ask Exova for a comprehensive
 22 strategy or advice on the specific cladding proposals at
 23 that time?
 24 A. No.
 25 Q. I now want to ask you just a few questions about cavity

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1 barriers in the crown. If we can go to drawing
 2 {SEA00002551}, and we will need the offline version of
 3 that, this is dated -- it's a drawing, you can take it
 4 from me, I appreciate it's small, dated
 5 26 September 2013 and it also formed part of the
 6 employer's requirements, and it's a drawing of the
 7 façade where it meets the top of the building, the crown
 8 of the tower.
 9 If we look at the very top right-hand side, so
 10 I want to look at that section on the right, if we can
 11 go into that, do you see at the very first label at the
 12 top it says:
 13 "Design of the crown detail TBC by architect."
 14 Do you see that there?
 15 A. Yes.
 16 Q. Is it right that at that stage that part of the design
 17 was outstanding, it hadn't been worked out yet?
 18 A. Correct, yes.
 19 Q. Does it also follow that not much thought will have gone
 20 at that stage into where cavity barriers should be
 21 located at the crown?
 22 A. Correct.
 23 Q. Now, we can see a horizontal cavity barrier that appears
 24 to be there at the head of the window on the top floor.
 25 Can you see there is a smaller hatched little rectangle

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1 there? Do you see that?
 2 A. Sorry, at the head of the window?
 3 Q. Yes.
 4 A. Yes.
 5 Q. But there is no other detailing about cavity barriers at
 6 the top of the building, is there?
 7 A. No.
 8 Q. And no indication of how the horizontal cavity barriers
 9 at the top would meet with the vertical cavity barriers?
 10 A. Well, it's a section rather than a detail at the corner,
 11 but there are dotted lines beyond which, as they appear
 12 on the section on the left, I would interpret as being
 13 the barriers behind the cladding.
 14 Q. We don't get an elevation of that, do we?
 15 A. No.
 16 Q. We haven't been able to find one. So was it the
 17 intention that Studio E would be carrying out further
 18 detailed design work of the crown at a later stage?
 19 A. The work is -- sorry, the design is outstanding because
 20 of the ongoing planning negotiations, and I ...
 21 I believe it was clarified as part of the -- actually
 22 I think it was part of the materials submission.
 23 Q. Can I show you another drawing from Mr Hyett's report,
 24 this is {PHYR0000003/50}, and it's figure 3.21. This is
 25 Mr Hyett's elevation where he's shown how, in his

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1 opinion, cavity barriers should have been arranged
 2 around the crown at the head of the building. Do you
 3 see that?
 4 A. Yes.
 5 Q. Can you explain why Studio E never produced a similar
 6 drawing to this on the Grenfell project, an elevation
 7 which looked at the cavity barrier detailing at the top
 8 of the building?
 9 A. I think this comes back to the same position, we did not
 10 expect to be detailed designing every aspect of the
 11 envelope.
 12 Q. Okay. So that was something you left to Harley and
 13 Rydon to work out, was it?
 14 A. Correct.
 15 Q. Yes. Staying with the crown for a moment, can we go to
 16 {SEA00006663}. This is an email to you -- from you,
 17 sorry, to Paul Dunkerton on 16 November 2012. Do you
 18 see that there?
 19 A. Yes.
 20 Q. These seem to be notes from the architecture appraisal
 21 panel meeting.
 22 A. Correct.
 23 Q. At the fourth bullet from the bottom, it says:
 24 "'White lump' at top - opportunity to do something
 25 with the top of the building. Amenify space?

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1 Conservatory?"
 2 Do you see that there?
 3 A. Yes.
 4 Q. You have said in your statement that in response to this
 5 Studio E increased the height and elaborated the design
 6 of the crown. That's at paragraph 154.3 of your
 7 statement {SEA00014273/76}. Is that correct?
 8 A. That's correct.
 9 Q. Now, is it right, then, that some changes to the crown
 10 were then suggested as part of the value engineering
 11 process? Let's look at a document. Can we go to
 12 {SEA00007672}. This is an email dated 22 May 2013 from
 13 Robert Powell of Appleyards, later Artelia, to
 14 Phillip Booth of Artelia, copying you in. Do you see
 15 that?
 16 A. Yes.
 17 Q. I want to look at the second paragraph. We can see
 18 there he says:
 19 "The perception is that if we retain the planned
 20 external envelope treatment, alloy windows and only
 21 reduce the scale of the crown, then we are not departing
 22 too wildly from the existing planning application. The
 23 biggest question mark remains over the access to the
 24 walkway and the lift ..."
 25 Do you see that there?

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1 A. Yes.
 2 Q. Is it right that any reduction in the scale of the crown
 3 would have been subject to the approval of the planning
 4 officers?
 5 A. At this point, I'm sorry, you've jumped over quite a big
 6 event, which was that architects appraisal panel and the
 7 feedback we received --
 8 Q. Yes.
 9 A. -- and what happened thereafter.
 10 Q. Right.
 11 A. Are you wanting me to comment on ...?
 12 Q. The question I asked you is: is it right that this would
 13 all be subject to the approval of the planning officers
 14 and that their judgement would be based on appearance
 15 rather than considerations of fire safety?
 16 A. Correct, yes.
 17 Q. Now, I think we have seen that no detailed design work
 18 had been done for the crown at the tender stage; we just
 19 looked at that.
 20 Can we just look at something in the very first
 21 draft of the NBS specification dated 21 November 2013.
 22 Can we go to that at {SEA0000152}. So this draft, we
 23 know or we believe it was dated 21 November 2013 and it
 24 was a draft before the one on 29 November 2013 which was
 25 issued to tenderers. Yes?

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1 A. Sorry, this was January?
 2 Q. This was 21 November 2013, so this is what we think is
 3 the first draft of the NBS specification that we can
 4 find. There seems to be another one on
 5 29 November 2013, and then there is the one from
 6 January 2014, which was the final version.
 7 A. Right.
 8 Q. Can you recall who was sent this first draft of the NBS
 9 specification?
 10 A. No. I believe, if it was the first draft, it possibly
 11 wasn't issued for tender.
 12 Q. No, no, I don't think it was issued for tender. We
 13 think it might have been sent to the TMO but we can't
 14 see it being sent to anybody else. Might that be right?
 15 A. I can't recall.
 16 Q. Okay. Can we look at page 81 {SEA00000152/81} within
 17 this first draft, and I want to look at clause 130. So
 18 this earlier version has some detail included for the
 19 crown, which was not included in the later versions. It
 20 states under "Material" -- do you see it says there,
 21 it's the second bullet point there:
 22 "Material: Panel made up of two sheets of zinc that
 23 are 0.5 mm thick and thermo-glued on either side of a
 24 mineral-rich polyethylene core."
 25 Do you see that?

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1 A. Yes.
 2 Q. I want to ask you about that, those words "mineral-rich
 3 polyethylene core". Did you appreciate at the time that
 4 the reference to that mineral-rich polyethylene core was
 5 likely referring to an FR fire retardant core?
 6 A. No.
 7 Q. So --
 8 A. No, and I didn't prepare this in the first instance.
 9 I'm not sure that would have --
 10 Q. Do you know who within Studio E --
 11 SIR MARTIN MOORE-BICK: Sorry, you hadn't finished.
 12 A. I'm not sure who did prepare this, although -- I keep
 13 bringing up work that was done almost a year before
 14 this, but I think a good portion of this specification
 15 had been completed by Adrian Jess.
 16 MS GRANGE: Okay.
 17 A. And he would have -- he may well have put this in. But
 18 there was never any intention to have a different
 19 (inaudible) to the crown as to the rest of the building.
 20 Q. I want to ask whether or not you were aware, though, at
 21 the time that there had been a desire to provide
 22 a superior fire rating for the crown over and above the
 23 fire rating for panels on the rest of the building lower
 24 down?
 25 A. No.

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1 Q. So you can't explain to us why this is talking about
 2 a mineral-rich polyethylene core?
 3 A. I think it's because the specification goes back to
 4 anywhere from December '12 to February '13 when we were
 5 considering a zinc composite; and this is a secondary
 6 clause to H92, a non-standard item, being the crown, so
 7 I think the first draft possibly for this H92 made
 8 reference to VMZinc. That's my --
 9 Q. I see, yes.
 10 A. -- understanding.
 11 Q. But you see why we're asking you about this; you can
 12 understand why the reference to a mineral-rich
 13 polyethylene core is something that --
 14 A. I think that's copy/pasted from the manufacturer's
 15 information.
 16 Q. I see, but you don't think it would have been understood
 17 within Studio E that that was a superior panel to the
 18 one that finally appeared for the more general sections
 19 of the tower in the later version of the NBS spec?
 20 A. From my side, definitely not. Mineral-rich is
 21 ambiguous.
 22 Q. I see. When I say superior, I mean superior to the
 23 Reynobond ACM panel that was one of the alternatives.
 24 A. The core, you meant, you're talking about a superior
 25 core or a superior finish?

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1 Q. Superior fire performance.
 2 A. No.
 3 Q. Now, can we just look at another drawing -- we're almost
 4 finished this topic -- at {SEA00002596}. This is
 5 another one of the employer's requirement drawings. If
 6 we see at the top of the building, this -- is it right
 7 that this drawing is showing what some people have
 8 described, I think, on the project as a radiator effect
 9 design for the top of the building? Which is what was
 10 ultimately installed, wasn't it?
 11 A. Yes.
 12 Q. So channels of ACM, C-shaped channels that were
 13 interconnecting?
 14 A. The white lump that Will Alsop referred to in his
 15 feedback on -- at the AAP, is the plant room at the top,
 16 the tank rooms, the lift motor room.
 17 Q. Yes.
 18 A. And the other -- for instance the exhaust for the
 19 bathrooms and the --
 20 Q. Yes.
 21 A. -- fire lobbies are all contained within that concrete
 22 box which is set back from the edge.
 23 Q. Yes, and the smoke extract comes out that top as well?
 24 A. Yes, and the existing building included perforated
 25 pre-cast panels which you might see on -- you will see

100

1 on earlier photographs, which provided the kind of
 2 crown, existing crown, and this was our solution to
 3 concealing that existing pre-cast element to unify the
 4 appearance.
 5 Q. Did you ever consider the fire safety of the crown at
 6 any point during the design process?
 7 A. I'm afraid with ... we were not aware of the combustible
 8 risk of ACM, otherwise of course we would. That, to
 9 our -- to my thinking at the time, was just metal
 10 outside, and therefore presented no hazard or risk.
 11 Q. I see, so does it follow that: were there ever any
 12 discussions -- forget ACM for the moment -- about the
 13 crown and fire in relation to the crown and the need to
 14 consider whether or not the crown might be a vehicle for
 15 fire spread in the event of an external fire?
 16 A. I watched Professor Torero's evidence, because
 17 I certainly didn't understand the risk that it posed.
 18 Q. No, so is the answer to my question: no, it was never
 19 discussed?
 20 A. No.
 21 Q. Sorry, my transcript is still not working. Can you just
 22 be clear: was it ever discussed?
 23 A. No, it was never discussed.
 24 Q. In terms of the design of the windows now -- sorry,
 25 there is one more topic on cavity barriers which I just

101

1 want to cover.
 2 Did you ever discuss the cavity barrier strategy
 3 with Mr Crawford? When he gave his evidence, he said
 4 that you were adamant that the cavity barrier strategy
 5 was correct. What he seemed to mean by that was none
 6 around the windows but just around compartment lines.
 7 He said that at {Day10/190:13-15}. Do you recall being
 8 adamant in discussions with Mr Crawford about the cavity
 9 barrier strategy being correct?
 10 A. I can't remember being adamant about the cavity barrier
 11 strategy being correct, but I was confident that Tomas
 12 had checked it with someone in that it was viable;
 13 viable, it was -- we could expect it to be accepted.
 14 I had confidence in what Tomas had presented to me.
 15 Q. Would you agree that a reasonably competent architect
 16 would prepare an indicative design of, amongst other
 17 things, the cavity barrier arrangement for RIBA stages D
 18 and E?
 19 A. No.
 20 Q. Does it follow that you don't agree, therefore, that
 21 this work should start with a review of statutory
 22 standards and relevant guidance?
 23 A. The principles were understood, so I'm not sure
 24 I understand the question. If --
 25 Q. Did Studio E to your knowledge ever do a review of

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1 statutory standards and relevant guidance for the cavity
 2 barrier arrangement at Grenfell Tower?
 3 A. I think I want to repeat what I said earlier. These
 4 statutory requirements as contained in the approved
 5 document are guidance and require a high degree of
 6 interpretation, so it's not possible to go down the list
 7 and tick off items.
 8 Q. I see.
 9 SIR MARTIN MOORE-BICK: I think the question was whether
 10 Studio E had undertaken an investigation into that.
 11 Wasn't that your question?
 12 MS GRANGE: Absolutely.
 13 A. On our own? I think that I can only refer to it, as
 14 borne out in Tomas' and Neil's evidence, as evidence
 15 that we did take steps to check.
 16 Q. Can we just look at a couple of examples from Mr Hyett's
 17 report before we break. If we can go to
 18 {PHYR0000003/64}. So here, and in a series of drawings,
 19 what Mr Hyett has done is he has indicated where the
 20 position of the cavity barriers was as indicated in the
 21 Harley drawings, and then where the cavity barrier
 22 position he says should have been at the window jamb, so
 23 it's the difference between the solid red line and the
 24 dotted red line. Do you see that there?
 25 A. Yes.

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1 Q. There are a number of these drawings. Let's look at
 2 another one, for example at the cill. If we look at
 3 page 65 {PHYR0000003/65}, he's outlined in a dotted line
 4 where at the cill level a cavity barrier ought to have
 5 been, whereas no cavity barrier was shown in the Harley
 6 drawings.
 7 Then at the window head on the next page,
 8 {PHYR0000003/66}, he has indicated that the cavity
 9 barrier should have been immediately at the window head
 10 in the dotted line, rather than remote from it in the
 11 solid red line.
 12 Do you see that there?
 13 A. Yes.
 14 Q. Did you think it was Studio E's responsibility to
 15 address this kind of detailing in its designs?
 16 A. No.
 17 Q. Can you explain why? Why not?
 18 A. This level of detail is stage F, fabrication or detailed
 19 design. So I don't believe that fell to us to direct
 20 Harley on -- as to how they proposed to satisfy the
 21 requirements of the ... the employer's requirements.
 22 Q. That was my next question: did you think it was
 23 Studio E's responsibility to make sure Harley addressed
 24 this kind of detail in its designs?
 25 A. Under what ... under what authority?

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1 Q. Well, under the Rydon deed of appointment, for example,
 2 seek to ensure that designs met the statutory standards,
 3 that was one provision within that deed of appointment.
 4 But forget the detail of that deed for a moment, I just
 5 want to know whether you understood at the time that it
 6 was Studio E's responsibility to make sure Harley
 7 addressed that kind of detailing in its designs?
 8 A. I don't believe it was at all. I think that would
 9 have -- that would have created duties which we did not
 10 expect to have. That would have placed design -- full
 11 design responsibility on Studio E. So I think it was
 12 a very clear line, and that is very typical of design
 13 and build as a method of procurement.
 14 Q. So does it follow then that you wouldn't have expected
 15 Mr Crawford to pick up on those kind of design issues?
 16 For example, nothing at the cill and ... you wouldn't
 17 have expected Mr Crawford to be questioning that when he
 18 was being shown the drawings?
 19 A. I think you have to look at each detail in -- on its
 20 own. But if you take this option here -- sorry, this
 21 detail in front of me, where the location of the barrier
 22 above the window needing to be literally at the window
 23 head to me introduces all sorts of practical problems
 24 for the installer. And I also am not clear why that
 25 would have been a requirement under the -- any reading

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1 of the approved document. So I think the onus on Neil
 2 to flag it is false. I don't think he did have that
 3 onus.
 4 Q. Okay.
 5 Just one final question, if I may: were you ever
 6 personally involved in considering Harley's design
 7 drawings after Studio E was novated to Rydon, or did you
 8 leave that task to Mr Crawford?
 9 A. I ... as far as I can recall, I left that entirely to
 10 Neil. I certainly remember seeing drawings coming in,
 11 and -- but I didn't, I didn't seek to study them.
 12 MS GRANGE: Okay.
 13 Mr Chairman, I understand there has been a bit of
 14 a problem with the live transcript.
 15 SIR MARTIN MOORE-BICK: With mine, at least.
 16 MS GRANGE: We will have to investigate what's happened over
 17 the lunch break, but that is an appropriate moment, if
 18 that's okay.
 19 SIR MARTIN MOORE-BICK: Yes. We will have a break now for
 20 lunch, Mr Sounes, and come back at 2 o'clock, please.
 21 You go with the usher. Don't talk to anyone about your
 22 evidence, please.
 23 (Pause)
 24 Ms Grange, I'm sure that those who are dealing with
 25 the transcript know there is a problem. I can only

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1 apologise to you and everyone else who is trying to make
 2 use of it, and we will hope it's back in action at
 3 2 o'clock.
 4 MS GRANGE: Exactly, thank you.
 5 SIR MARTIN MOORE-BICK: 2 o'clock, please.
 6 (1.02 pm)
 7 (The short adjournment)
 8 (2.15 pm)
 9 SIR MARTIN MOORE-BICK: Now, before we resume, can I just
 10 say for the benefit of those watching this on the live
 11 stream that we have had a certain amount of difficulty
 12 this morning with the running transcript. I have had
 13 a chance to speak to the technical people and they're
 14 confident that they have identified the problem, and
 15 that we are able to resume now with everything working.
 16 And, indeed, it does appear to be working.
 17 I apologise for the difficulties that that's caused,
 18 but I'm reasonably confident that we can now resume in
 19 the normal way.
 20 So I'm going to ask the usher to bring Mr Sounes
 21 back, please.
 22 (Pause)
 23 Mr Sounes, I think for the second time today you
 24 have been kept waiting longer than you might have
 25 expected. I'm sorry about that. We have been having

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1 some technical difficulties. But we are ready to carry
 2 on.
 3 Can I just ask you this, though: it may be that we
 4 might want to run a bit longer than usual this
 5 afternoon, we will see how we go. Would that trouble
 6 you in principle?
 7 THE WITNESS: No, that's fine.
 8 SIR MARTIN MOORE-BICK: We will see how we get on, anyway.
 9 Yes, Ms Grange.
 10 MS GRANGE: Thank you very much.
 11 Yes, if I can start with some follow-up questions
 12 from topics we were discussing this morning.
 13 On cavity barriers, can I go to a section of
 14 Mr Hyett's report again, {PHYR0000004/67}, and look at
 15 figure 4.44. I want to look at the plan that's at the
 16 bottom of that page, and what this is is an extract from
 17 the drawing that we were looking at, 1279 (06) 110,
 18 "Proposed Typical Bay", that was a drawing that formed
 19 part of the employer's requirements.
 20 I don't think we looked at this plan section this
 21 morning, but the short question that I've got for you
 22 is: when you looked at this drawing at the time, what
 23 did you think the little hatched area was right at the
 24 junction between the window frame and the column?
 25 A. I can't confirm what I thought it was at the time, if

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1 that's your question.
 2 Q. Yes. All we see on the labels is there is a label
 3 coming down from it, the middle label, that says "Window
 4 EDPM lapped over existing structure", so is that the
 5 EDPM membrane?
 6 A. That's providing the weather seal behind -- direct onto
 7 the concrete.
 8 Q. But you can't help us as to what that hatched area is
 9 there?
 10 A. I think it's a recognition that it would need to be
 11 insulated and that it ... no, I can't -- I think it's
 12 indicative.
 13 Q. Okay, thank you.
 14 On resident consultation, I took you to a document
 15 that I now just want to go back to, {TMO10037758}. What
 16 I want to do is start at the bottom of page 1. This is
 17 an email from Mr Peter Martindale. We have been
 18 helpfully told that he was a resident of the tower at
 19 the time. He is sending you an email on 20 August 2012.
 20 Do you see that?
 21 A. Yeah.
 22 Q. And he is raising a number of points.
 23 If we go on to page 2 {TMO10037758/2}, it's item 4
 24 that I just want to ask you about. He says here:
 25 "As expressed at our last meeting, I am concerned

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1 that the implications of choices are not being fully
 2 explained to residents, who, for example, when asked to
 3 choose a design for the windows have not had explained
 4 that it is not just the window but the entire vicinity
 5 of the window will be substantively effected.
 6 "What they think they are opting for and what they
 7 will discover they are getting when work starts could
 8 lead to some very disgruntled people."
 9 Do you see that there?
 10 A. Yes.
 11 Q. Can you recall receiving this email from Mr Martindale?
 12 A. Now that I know he lived in the tower, I can possibly
 13 place him, but I'm not sure. I'll be honest, I don't
 14 recall this email.
 15 Q. What was your reaction to the criticism that appears to
 16 be made here that the implications of choices are not
 17 being fully explained to residents?
 18 A. Sorry, repeat that, what is my ...?
 19 Q. What was your reaction to the criticism that appears to
 20 be being made here that the implications of choices, ie
 21 choices for the design, are not being fully explained to
 22 residents?
 23 A. I did not -- I would have passed this on to the TMO --
 24 Q. I see.
 25 A. -- I suspect, at the time. I would not engage in

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1 a one-to-one with a resident.
 2 Q. Does that mean you didn't kind of think substantively
 3 about the complaint that seems to be being raised there?
 4 A. I would have -- if it was a ... I don't think it wasn't
 5 discussed with residents what the implications of the
 6 proposed changes were. It would have required
 7 a conversation, I think. He is suggesting that we're
 8 not explaining it adequately.
 9 Q. Yes.
 10 A. That's how I read that. In other words, it's not been
 11 communicated.
 12 Q. But is it right from what you just said that you didn't
 13 think that was a valid criticism?
 14 A. Well, I think it's all prefaced by residents might not
 15 be understanding the full implications.
 16 Q. Yes.
 17 We can see at the top of page 1 {TMO10037758/1} that
 18 Mr Dunkerton appears to respond to this, cc'ing you in,
 19 saying, "thank you for your comments" and "thank you for
 20 taking the time to attend our presentation".
 21 Do you recall whether you ever responded?
 22 A. No, I wouldn't respond direct.
 23 Q. Okay.
 24 Then on design responsibility, just picking up
 25 a different topic, you said very candidly this morning

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1 that you did not look at ADB in carrying out the design
 2 of the cladding on Grenfell Tower because you said it
 3 was only guidance and you found it difficult to
 4 interpret; is that correct?
 5 A. Difficult to reach a definitive interpretation.
 6 Q. Yes. So can I ask you: how did you, as lead consultant
 7 and with co-ordination responsibilities, propose to
 8 ensure that the cladding design that you proposed was
 9 sufficient to satisfy the Building Regulations if you
 10 weren't complying with the guidance in Approved
 11 Document B?
 12 A. I think I would take issue with that phrase, "comply
 13 with guidance". You can comply with a clear set of
 14 requirements, but complying with the approved document
 15 requires an insight which I believe we had (a) employed
 16 Exova to input on, and (b) the contractor had employed
 17 a specialist façade subcontractor to input on. And
 18 ultimately Building Control would agree the whole.
 19 Q. But I'm asking you how you sought to comply with the
 20 Building Regulations themselves, the functional
 21 requirements. If you weren't following the practical
 22 guidance in ADB, what were you following?
 23 A. I believe it's those steps that we took.
 24 Q. So those steps that --
 25 A. Engaging those entities to support us, we sought to

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1 comply.
 2 Q. I see. So because you had --
 3 A. I've since come across alternative forms of regulation,
 4 so I feel that referring to the guidance as somehow
 5 definitive is inaccurate. It requires a high level of
 6 interpretation.
 7 Q. We're not saying that the guidance is somehow
 8 definitive, but I think the point I'm putting to you is:
 9 if you are not going to follow that practical guidance,
 10 shouldn't you have been following something else that
 11 gave you a route to compliance with the functional
 12 requirements, including the functional requirements
 13 under part B of the Building Regulations?
 14 A. Now I don't understand, because Exova's fire strategy
 15 report refers specifically to part B, Building Control
 16 specifically referred to part B.
 17 Q. So does it --
 18 A. So the judgement as to whether something meets the
 19 requirements is a judgement; it's not something that the
 20 approved document can give you categorically.
 21 Q. I see, okay.
 22 Now, if, as you suggested this morning, you did not
 23 think diagram 33 of Approved Document B was applicable
 24 to the cladding, as opposed to being applicable to
 25 conventional construction, to what guidance did you, as

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1 project leader for Studio E, direct the members of your
 2 team to in order to comply with the
 3 Building Regulations?
 4 A. The approach we took was to confer with others, both in
 5 the industry and consultants, and this largely postdates
 6 the period of my intense involvement in the project, and
 7 I don't believe we ever sought to comply against some
 8 other code of practice --
 9 Q. Okay.
 10 A. -- or approved -- or system of approval.
 11 Q. Okay, thank you.
 12 Windows. I've got some brief questions for you on
 13 windows.
 14 Now, in terms of the design of the windows, I think
 15 we can agree that the new windows at Grenfell Tower lay
 16 outside and forward of the plane of the original masonry
 17 fabric and structure; is that correct?
 18 A. Yes.
 19 Q. As such, the windows were no longer sealed against the
 20 solid concrete surround; is that correct?
 21 A. Yes.
 22 Q. Now, it's correct, isn't it, that changes in the size
 23 and placing of the new windows created gaps as a result
 24 of moving the windows outwards of that plane of the
 25 concrete structure?

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1 A. Yes.
 2 Q. Can we look at a drawing that helps with this. If we
 3 can bring up {INQ00011312/7}, this is one of the Harley
 4 drawings that was approved for construction, and we see
 5 the Studio E stamp as well there.
 6 I've brought this up because it's helpfully got some
 7 green at the gap between the column and the window
 8 frame. Do you see that green gap?
 9 A. Yes.
 10 Q. There's actually some text with a little note, and it
 11 says:
 12 "Note: this varies 35-90 as columns not plum.
 13 However all windows align vertically ..."
 14 Do you see that there?
 15 A. Yes.
 16 Q. So is it right, and were you aware at the time, that
 17 that gap between the window frame and the column might
 18 vary between 35 and 90 millimetres?
 19 A. I wasn't aware of the scale of the tolerance, but I --
 20 on every project there's tolerance.
 21 Q. What I want to know is: did that gap concern you at all
 22 during your time on the project? Was that something
 23 that you gave any attention to?
 24 A. We knew that there would need to be a gap to accommodate
 25 the tolerance. That was something we were aware of.

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1 Q. It's really the size of the gap. Did that ever concern
 2 you, the size of it and the potential variation in it?
 3 A. In itself, no, that didn't concern me.
 4 Q. Do you remember ever discussing it specifically on the
 5 project with anybody?
 6 A. No.
 7 Q. Does it follow that you didn't ever think about the
 8 potential fire risks that might be posed by that gap?
 9 A. I think you can only ask that question with hindsight.
 10 If you were to see that gap in isolation, you would want
 11 to know where the risk was, and there is -- I mean, it
 12 should be obviously packed with insulation, but you
 13 would not expect there to be a fire hazard sitting
 14 within the cladding zone.
 15 Q. Okay.
 16 A. In other words, I would be -- if I heard your question,
 17 if someone had asked me that before, I would be thinking
 18 rather of the -- you know, where's the hazard? I can't
 19 see where the hazard is.
 20 Q. Now, did you know that the EDPM membrane was to sit in
 21 that gap as part of the final design of the window?
 22 A. It largely closes the gap for the sake of
 23 weatherproofing.
 24 Q. So is the answer yes, that you were aware that an EPDM
 25 membrane was going to be across that gap? I think it's

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1 indicated here in the dotted line .
 2 A. I think that is quite a typical detail .
 3 Q. Okay.
 4 A. I knew it would be a membrane.
 5 Q. Did you know at the time of the Grenfell project that
 6 EPDM rubber membrane is a combustible material and will
 7 burn quite rapidly if ignited?
 8 A. No, but I knew it was based on -- was rubber, based on
 9 rubber.
 10 Q. Okay.
 11 A. So ...
 12 Q. So the fact it was based on rubber --
 13 A. It is combustible, yes.
 14 Q. Yes. But that's not something you gave any specific
 15 attention to on the project yourself?
 16 A. Again, I was not aware of there being any hazard in this
 17 zone to be concerned with combustibility of components
 18 of that nature, which is quite an isolated item.
 19 Q. Okay.
 20 I now want to just ask you a few short questions
 21 about the insulation products that were used at the
 22 interface between the window frames at the head, jamb
 23 and cill of the windows.
 24 Can we look at something in Mr Hyett's report to
 25 start with. This is {PHYR0000002/39}, and it's

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1 figure 2.13.
 2 Now, this is a diagram adapted by Mr Hyett of
 3 a Harley drawing, {HAR00008880}, and we can see the area
 4 he's outlined in the drawing in red. That's the line of
 5 the original concrete column. Do you see that there?
 6 A. Yes.
 7 Q. At the top of the diagram, to the right of the red, we
 8 can see running parallel with the red line it says:
 9 "Window board & soft joint by others."
 10 Do you see that?
 11 A. Yes.
 12 Q. It's writing sitting on its side. This indicates the
 13 new internal window reveals that would be installed as
 14 part of the internal window reveal; is that correct?
 15 A. Yes.
 16 Q. Now, above this we can see the mark-up. It says:
 17 "Existing frame remaining in most cases. Remove by
 18 others where necessary."
 19 Do you see that?
 20 A. Yes.
 21 Q. So that's the old existing wooden door frame?
 22 A. No, that was aluminium. It was an aluminium frame.
 23 Q. Okay. Sorry.
 24 A. The outer frame for the sliding windows.
 25 Q. Then below the outline of the original metal window

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1 frame, we can see insulation indicated, and the mark-up
 2 says "Insulation by others". Do you see that there?
 3 A. Yes.
 4 Q. Now, if we look at the employer's requirements and the
 5 NBS specification, if we can go to {SEA00000169/243},
 6 there's there reference to "Compressible insulation in
 7 gaps", do you see that at item 235 at the bottom?
 8 A. Yes.
 9 Q. Do you see that there? It says:
 10 "Manufacturer: Rockwool Limited ..."
 11 Do you see that?
 12 A. Yes.
 13 Q. We have discussed what Rockwool is.
 14 Now, I want to look at one of the employer's
 15 requirements drawings, if we go again -- I think it's
 16 the same drawing we looked at this morning --
 17 {SEA00002499}, and it's the offline version. I want to
 18 go to the very bottom left sketch, the plan at the
 19 bottom left. We can see various tags there where the
 20 window frames meet the existing reinforced concrete
 21 wall, and it says:
 22 "Existing reveal cladding to be retained and new
 23 cladding fixed through it. Add new lipping to cover new
 24 and existing cladding edge."
 25 Do you see that there? It's the third --

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1 A. Yes.
 2 Q. -- tag down in that drawing.
 3 A. Yes.
 4 Q. Then in the middle, at the existing internal partitions,
 5 it states:
 6 "Cut back existing plasterboard partition to allow
 7 window installation. Install new timber reveal
 8 cladding."
 9 A. Yes.
 10 Q. Can you see that? Yes, that's in the middle label --
 11 A. Yes.
 12 Q. -- "Cut back existing plasterboard", so away from the
 13 column.
 14 At the bottom there is reference in the second tag
 15 up to "Window EPDM lapped over existing structure".
 16 Now, would you agree that there is no indication in
 17 this plan here of any packing material to the internal
 18 window lining?
 19 A. I don't think this scale of drawing really permits that.
 20 Q. No.
 21 What I want to put to you is: is it right that,
 22 while Studio E specified compressible Rockwool
 23 insulation in the NBS, neither mineral wool nor Rockwool
 24 is specified on the tender drawings?
 25 A. Correct, but tender spec takes precedence over the

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1 drawings.
 2 Q. I see. So I wanted to ask you whether you agree that
 3 Studio E ought to have identified on the drawings the
 4 type of insulation product that should be used in this
 5 application; do I take it you don't agree with that?
 6 A. No, the reason for the codes is to point to the
 7 specification.
 8 Q. I see. I don't think we see any labels here that are
 9 referring back to that bit of the specification.
 10 A. No.
 11 Q. No.
 12 On the window infill panels, just some short
 13 questions about those. If we look again at the NBS
 14 specification, {SEA00000169/145}, this is item 332,
 15 within the section L10, and it's under the heading
 16 "Aluminium windows fixed unit" there. What it's talking
 17 about is under "Panel/facing type", so that's the second
 18 little bullet down, it says:
 19 "Aluminium faced insulated panel comprising core
 20 insulation, aluminium lining panel and integrated
 21 channel profile around perimeter ..."
 22 Do you see that there? Can you see that? It's the
 23 second little dot down. There is a dot that says
 24 "Finish as delivered: Polyester powder coating" and then
 25 there is a dot that says "Panel/facing type"; do you see

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1 that?
 2 A. Yes.
 3 Q. And then it says:
 4 "Aluminium faced insulated panel comprising core
 5 insulation ..."
 6 Do you see that?
 7 A. Yes.
 8 Q. That's what we understand to be the -- we call them the
 9 window infill panels; yes?
 10 A. Yes.
 11 Q. I think we can see there an insulated core has been
 12 specified but no specific product is identified for
 13 that --
 14 A. Yes.
 15 Q. -- item.
 16 Now, what I want to put to you is that, at this
 17 tender stage, Studio E should have at least specified
 18 that that insulation product should be of limited
 19 combustibility in accordance with the guidance in
 20 paragraph 12.7 of Approved Document B; would you accept
 21 that?
 22 A. No, because that would be subject to the method of
 23 demonstrating compliance.
 24 Q. So does it follow that you left that to the contractor
 25 and any relevant subcontractor to determine exactly what

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1 type of panel --
 2 A. Yes.
 3 Q. -- they provided there?
 4 A. Yes.
 5 Q. Okay.
 6 Now, I'm going to come on to ask you some questions
 7 about Building Control in a minute, which is perhaps the
 8 main topic for this afternoon, but I just want to pick
 9 up just a few other points that I think are logical to
 10 pick up at this point, some of them relating to Exova
 11 and Mr Ashton's evidence.
 12 First of all I want to pick up a point arising from
 13 Mr Ashton's oral evidence. He said that at the first
 14 meeting with the design team which he attended, he made
 15 the point fairly forcefully that the proposals that had
 16 been drawn up by Studio E were not acceptable in terms
 17 of getting Building Control approval and, therefore, he
 18 says he said:
 19 "... we needed to do some serious work to get to
 20 a situation where we could go forward with Kensington
 21 and Chelsea ... confident that a scheme would be
 22 approved."
 23 That was on {Day17/9:4-12}.
 24 Now, he couldn't give an exact date of that meeting,
 25 but he says he thought that was the first time he

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1 attended with all of the team there and the client
 2 there, and we know the first meeting he attended was
 3 a design team meeting on 6 September 2012.
 4 Now, what I want to ask you is whether you recall
 5 Mr Ashton saying something to that effect, either at
 6 that meeting or maybe at a later meeting, that he made
 7 the point forcefully that the proposals at that stage
 8 were going to need some serious work in order to go
 9 forward confident with Building Control?
 10 A. I obviously prepared the notes to that meeting --
 11 Q. Yes.
 12 A. -- which you have. When I take a note, of course, I am
 13 focused on the action. That was probably, you know,
 14 over any kind of record of the meeting. I'm more
 15 focused on what needs to be followed up. I can't say
 16 I didn't hear him say that. I remember him talking, but
 17 I can't remember -- I can only obviously point to my
 18 notes and the meeting that we had subsequent -- that we
 19 had a meeting, I think it was on the Monday. But
 20 I can't deny that he said something to that effect.
 21 So I can't -- it's too long ago to be sure what
 22 I remember him saying.
 23 Q. But you don't have a memory of him being very forceful
 24 in that first meeting about effectively the uphill
 25 struggle he thought you were going to have?

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1 A. I don't think he quite said that. No, he didn't say we
 2 were going to -- I don't think in his evidence --
 3 Q. He says he said:
 4 "... we needed to do some serious work to get to
 5 a situation where we could go forward ... confident that
 6 a scheme would be approved."
 7 Those were the words he used.
 8 A. Yes, as I say, I can't contradict that because I can't
 9 remember what he did say, but --
 10 Q. So he might well have said that?
 11 A. He might well have said something to that effect. And
 12 whose work is it? Was it his work or our work?
 13 Q. Did that chime with a general awareness you had at that
 14 time that you were going to have to do some serious work
 15 to be confident in any Building Control application?
 16 A. I think it's consistent throughout that we understood
 17 the issue with a single stair building without -- well,
 18 with a very limited smoke exhaust to the smoke lobbies,
 19 that it was sensitive and would need attention. That
 20 I think is consistent throughout.
 21 Q. Okay.
 22 Just staying with Mr Ashton for a moment, and
 23 thinking back to exactly this time period, we know from
 24 emails -- and I previously discussed this with you --
 25 that there was a meeting that you and Mr Ashton had on

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1 10 September 2012 after that, and you previously said in
 2 your evidence that you remembered elevations being on
 3 the table showing cladding, and you said this: that you
 4 were almost sure you discussed it. That was
 5 {Day8/48:23} onwards.
 6 A. Yes.
 7 Q. Now, Mr Ashton said to us last week that he didn't
 8 recall seeing any elevations of the building at that
 9 meeting, and that they certainly weren't discussed in
 10 any way, shape or form. He also said there had been no
 11 discussion about cladding at that meeting. That was
 12 {Day16/154}.
 13 Now, I want to come back to this, because you said
 14 before you were almost sure, and I want to ask you: how
 15 sure are you, first of all, that there were elevations
 16 on the table when you had the meeting with him?
 17 A. My memory is as it was, and I can give you another
 18 reference --
 19 Q. Okay.
 20 A. -- if that helps.
 21 Q. Yes, okay. Have you got it with you?
 22 A. I do. Of course, I've had to think about this, but it's
 23 {RYD00026230}.
 24 Q. Okay, yes. Let's bring that up.
 25 A. This -- the reason why I say there were elevations on

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1 the table is it was our large meeting room, and
 2 I believe at the end of the meeting I asked one of the
 3 assistants to bring out the A1 consultation boards that
 4 we had prepared --
 5 Q. Right.
 6 A. -- that summer, just to show Terry what we were doing.
 7 Q. Yes.
 8 A. So I don't -- I do agree with him we didn't discuss it
 9 in any detail, but I believe I showed him, let's say,
 10 this board, because I believe it was sitting in a folder
 11 in our office.
 12 Q. Am I right, this looks quite similar to some of what we
 13 see in the stage C report --
 14 A. Yes.
 15 Q. -- that you then put in at the end of October 2012; is
 16 that correct?
 17 A. Yes, yes.
 18 Q. So you had these --
 19 A. So I have this recollection, and I'm not sure I'm
 20 disputing what Terry says, but I believe I showed him
 21 what we were doing.
 22 Q. Yes.
 23 Can you recall any form of discussion about these
 24 elevations at that time?
 25 A. No.

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1 Q. No.
 2 A. We were showing him what we were doing.
 3 Q. Can you recall any substantive discussion about the
 4 cladding specifically at that meeting?
 5 A. I can't remember anything substantive, no.
 6 Q. Okay.
 7 Now, we know that Mr Jess sent a link to Mr Ashton
 8 and the design team, the stage C report. I looked at
 9 that with you previously and I looked at that with
 10 Mr Ashton. That was on 31 October 2012, the same day
 11 that you then got issue 1 of the fire strategy. It was
 12 just cc'd in to Mr Ashton. He was not one of the main
 13 recipients but he was a cc.
 14 Can I just ask: what were your expectations of
 15 Exova, if you had any, when that link was sent to them?
 16 A. I think at that point it was a record, stage C is
 17 a record.
 18 Q. Did you expect Mr Ashton to open the link and have
 19 a look at the stage C report in order to inform himself
 20 about where you were on the design of the project?
 21 A. Not per se. It was obviously circulated as a record, so
 22 I would ... I would expect certainly the other designers
 23 to have downloaded it as a record.
 24 Q. But not him? You wouldn't have expected that?
 25 A. No, I don't recall having any thoughts about what he

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1 might do, I just circulated it.

2 Q. By the time it came to his issue 2 of the outline fire
3 safety strategy, the following October, would you have
4 expected him to have absorbed the contents of that
5 report by then?

6 A. I think we circulated drawings direct at that point.

7 Q. Right.

8 A. So ... and I don't think we circulated the full stage C
9 report with the elevations and the engineer's sections.

10 Q. Do you agree it would have been prudent for Studio E to
11 have asked Exova if they had seen the stage C document
12 at some point?

13 A. I wouldn't -- I think prudence -- I ... implying there's
14 some risk of something missing, getting missed, which
15 I wouldn't have expected there to be.

16 Q. Is that because -- to cut to the chase, are you saying
17 that you were sending drawings separately and it was
18 those drawings you were expecting him to look at, and
19 that you had no expectation of him looking at the
20 stage C report?

21 A. I can't ... I can't say that I expected him to look at
22 the stage C report, no. As to whether it's prudent for
23 him to have looked at the stage C report, well,
24 that's --

25 Q. No, prudent for you to have checked that he looked at

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1 it.

2 A. That's a difficult question in hindsight. Chasing
3 people to look at documents is ... would be endless.

4 Q. Right, yes.

5 A. Wouldn't it?

6 Q. So how did you think he was learning about the external
7 wall at the time, if he wasn't reading, for example, the
8 stage C report?

9 A. If it was pertinent, I would expect him to raise it.

10 Q. I see. So you were expecting a request from him for
11 further details?

12 A. Any consultant, if they needed to know something, would
13 ask.

14 Q. Right.

15 Just finishing this short topic on Exova and then
16 I will ask you more about Building Control, did you
17 believe that Exova remained engaged throughout the
18 project?

19 A. Sorry, can you just define "throughout"?

20 Q. Did you believe that Exova remained engaged -- we know
21 they were engaged by the TMO initially, the fee proposal
22 was accepted.

23 A. Yes, yes.

24 Q. Did you believe at the time that they remained engaged
25 throughout the project beyond Rydon's appointment?

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1 A. No, I -- well, when I say not engaged, I thought that
2 was a subject between Exova and the TMO, so --

3 Q. Did you think there was a point when Exova stopped
4 working on the project, pursuant to that appointment?

5 A. I believe with the issue of their third revision of
6 their outline strategy that they had concluded their
7 input on the report, on us -- that phase of the work.
8 And that -- the fee that they had tendered I believe
9 covered that.

10 Q. Right.

11 A. Didn't have a clear idea at the time of the scale of the
12 fee, but I knew it wasn't a big fee.

13 Q. Were you aware at the time that they were providing
14 ad hoc advice, for example on the cladding, in
15 September 2014 and in March 2015? Were you aware of
16 that?

17 A. I believe I was, and I think I was copied in to some of
18 the correspondence.

19 Q. You were. On what basis did you think they were
20 providing that advice?

21 A. In terms of an appointment or in terms of --

22 Q. Did you ever consider on what basis they were giving
23 that advice, that ad hoc advice?

24 (Pause)

25 A. I'm sorry, on what basis, are you implying on what

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1 terms?

2 Q. Yes. Who was their client for the purposes of
3 delivering that advice? What were the terms of their
4 engagement? Did you ever think about that?

5 A. I think it was ... did I think about it? I think
6 I understood that they were tying up the loose ends or
7 the -- some outstanding queries on the original
8 fire strategy.

9 Q. Right.

10 A. Or -- obviously because it was discussing detail, it was
11 very ad hoc and it was checking to see if they could
12 advise --

13 Q. Okay.

14 A. -- rather than being done on any formal basis.

15 Q. Okay, thank you.

16 So Building Control. I now just want to ask you
17 about some interactions with Building Control.

18 We know that the first meeting with Building Control
19 took place on 7 November 2012. Can we go and look at
20 the notes of that. This is {SEA00006526}. We looked at
21 this before in the context of insulation. These are
22 Mr Jess' notes of that meeting.

23 When you look at the email and all the subtopics, it
24 would appear that the focus was on means of escape
25 issues, and there is no reference in the notes of this

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1 meeting to any discussion about the overcladding, is
 2 there?
 3 A. No, I believe not.
 4 Q. Now, the next meeting with Building Control was on
 5 17 September 2013. Can we go with reference to that to
 6 {SEA00000121}. This is an email that you send to
 7 John Allen and Paul Hanson of RBKC Building Control
 8 dated 25 October 2013 in which you're reporting back
 9 following a meeting with them.
 10 Now, your statement says that the meeting had been
 11 on 17 September 2013. That's paragraph 292
 12 {SEA00014273/120}. But actually the first line of the
 13 email here says:
 14 "Further to our meeting at RBKC on 17 August ..."
 15 Can you help us as to which month it was, whether it
 16 was August or September?
 17 A. I think my statement says it was September.
 18 Q. Either way, in terms of the chronology, the stage D
 19 report was issued, I think, by Studio E in August 2012.
 20 I think that was right.
 21 A. Stage D?
 22 Q. Yes, the stage D report.
 23 A. Was 2013, I think. July or August 2013.
 24 Q. Exactly, this is in 2013 as well. So you have done the
 25 stage D report, and you're working towards the NBS

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1 specification and tender documents by October 2013; is
 2 that right?
 3 A. We're working towards submitting by November 2013, yes.
 4 Q. Yes.
 5 Now, can you explain why nearly a year had passed
 6 between the meetings with Building Control?
 7 A. Why I think there was a delay?
 8 Q. Yes, why so long between the two meetings? You have had
 9 the first one in November 2012, but then there has been
 10 no meeting until either September or August 2013.
 11 A. I think my witness statement, the large bulk of it
 12 covers the series of events which resulted in such
 13 a delay to the project, a combination of switch of,
 14 I think, procurement --
 15 Q. Yes.
 16 A. -- and a sort of planning impasse on the appearance of
 17 the tower, as well as the change in management at the
 18 TMO --
 19 Q. Right, yes.
 20 A. -- I think --
 21 Q. Yes.
 22 A. -- all contributed to the delay.
 23 Q. Now, you say in your statement that you don't recall
 24 what was discussed at this meeting -- just for the
 25 transcript, that's at paragraph 318 of your statement on

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1 {SEA00014273/129}.
 2 In light of the focus that there had been on B1 and
 3 B5 fire safety issues up to that point, would you agree
 4 that it's unlikely you discussed overcladding or the B4
 5 requirements at this meeting?
 6 A. I think it is unlikely --
 7 Q. Yes.
 8 A. -- given the conversations that followed this between
 9 Building Control and Exova.
 10 Q. Yes.
 11 Your email at the end, just in fairness to you, does
 12 say -- we see some of what was discussed, and then it
 13 says, right in the last paragraph:
 14 "There are a number of other issues in dealing with
 15 this refurbishment that need to be discussed and this is
 16 probably best done in person once you have had a chance
 17 to study the documents."
 18 Do you see that there?
 19 A. Yes.
 20 Q. Did any of those issues concern the overcladding?
 21 A. I can't recall what I was thinking of at that point.
 22 Q. We can see --
 23 A. But I know that at this meeting the focus on smoke was
 24 the primary issue, I seem to recall, at the expense of
 25 anything else.

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1 Q. Yes. Yes.
 2 In the attachments to this email, we can see that
 3 there are some drawings attached, and an outline fire
 4 safety strategy is attached. Do you see that there?
 5 A. Yes.
 6 Q. But the drawings -- we've checked those drawings --
 7 don't include any drawings of the proposed cladding.
 8 Does that sound right?
 9 A. Yes.
 10 Q. Yes.
 11 Now, a few days later on 29 October 2013 you email
 12 Claire Williams. Can we go to that, {SEA00009510}.
 13 I want to go to the second email at the bottom of the
 14 first page. This is an email that you have sent,
 15 Bruce Soules, to Duncan Campbell of Max Fordham,
 16 Matt Smith of Max Fordham and then Claire Williams of
 17 the TMO, and you're addressing them.
 18 Then can we go to the top of the second page
 19 {SEA00009510/2}. We can see what you said to Claire in
 20 that email. You say this:
 21 "Claire,
 22 "I followed up the Fire Strategy submission we made
 23 to Building Control on Friday. I managed to get through
 24 to Paul Hanson yesterday. John Allen was on leave. He
 25 initially didn't want to offer any time frame for a

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1 response, saying he was very busy and there were other
2 very urgent jobs needing his attention. I pressed him,
3 reminded him of the issues and why we needed London Fire
4 Brigade input and that they had offered to pass it on
5 for a quick reply. At that he said he would get onto it
6 next week."

7 Do you see that there?

8 A. Yes.

9 Q. So you're reporting back to her.

10 Then two lines down from that, you say this:

11 "I wondered if you had any leverage ..."

12 I think you might mean "any leverage"; yes?

13 A. Yes, yes, I think --

14 Q. "... to ensure we get the critical feedback we need to
15 inform the tender?"

16 Do you see that there?

17 A. Yes.

18 Q. Can you explain what you meant by that, asking her if
19 she had any leverage?

20 A. As an RBKC employee, whether she could speak to him
21 direct. As a third-party consultant, he may not feel as
22 inclined to be responsive, if that's been ...

23 Q. Exactly what were you expecting her to do when she spoke
24 to RBKC Building Control?

25 A. Nothing more than what I had communicated already. He

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1 has indicated that he would come back, I just thought:
2 it's urgent, I might ask.

3 Q. Is it fair to say at this time you felt under pressure
4 to finalise the tender documentation?

5 A. All projects have deadlines, and we had been given
6 a deadline.

7 Q. Were you hoping for a quick sign-off from
8 Building Control at this stage?

9 A. No, this issue specifically centred on the smoke exhaust
10 to the lobbies.

11 Q. Right.

12 I want to put to you: were you reluctant to raise
13 the cladding at this stage because you didn't want to
14 create any further delays on the project?

15 A. No.

16 Q. Is that why cladding wasn't raised?

17 A. No. I think I've explained before, the cladding was not
18 seen as a critical element to the viability of the
19 scheme at this point.

20 Q. So you didn't think you needed to have any discussions
21 with Building Control about the cladding?

22 A. No. That was ...

23 Q. Okay.

24 Now, can we go to {SEA00009805}. This is an email
25 from John Allen of RBKC Building Control to you dated

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1 11 November 2013.

2 In this email, we can see from the first few lines
3 that John Allen is saying that the information submitted
4 so far is not adequate to enable an effective
5 consultation with the fire authority. Do you see that
6 there?

7 A. Yes.

8 Q. It's clear from the remaining email that his concerns
9 appear to be related to the smoke control system; is
10 that correct?

11 A. That was how I understood it at the time.

12 Q. There is no reference to cladding here again, is there?

13 A. No.

14 Q. Now, you say in your statement that you were frustrated
15 that things weren't resolved before going to tender.
16 For the transcript, that's paragraph 323 of your
17 statement on page 131 {SEA00014273/131}.

18 Can we just go to an email you sent at the time,
19 this is {SEA00009809}. If we can blow up the top, this
20 is you to Claire Williams on 11 November 2013, and in
21 that first paragraph you say:

22 "Claire,

23 "Apologies if that was the impression."

24 Importantly, you say this:

25 "I am frustrated that the Fire Strategy principle

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1 has not been agreed prior to tender and I would expect
2 the TMO to be as well. I thought you needed to know
3 given the magnitude of design risk associated with fire.

4 "These are strictly M&E items and I don't see us
5 achieving resolution before the end of the week."

6 Do you see that?

7 A. I think you need to show the preceding email to show the
8 context, and I don't think it's on this.

9 Q. Yes, sorry. If we go down the page.

10 A. Yes.

11 Q. She is saying to you:

12 "You sound like 'fed up of Hammersmith'?"

13 What you are doing there -- and you can see it from
14 the blue text -- is she has extracted a bit of
15 Paul Hanson's email on the smoke control system and you
16 were all discussing that. Does that seem right?

17 A. There is a previous email to this which she responds to.

18 Q. Okay.

19 A. That's the context.

20 Q. Fine.

21 Can we go back up to the top of the page and your
22 email.

23 When you say, "I thought you needed to know given
24 the magnitude of design risk associated with fire", can
25 you just explain what you meant by that in this email?

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1 A. The context was discussing the meetings that we had had
 2 to discuss the -- to try and agree the smoke strategy.
 3 Q. Yes.
 4 A. That was the original email, and Claire had picked up
 5 a -- from my tone, which I hadn't intended to betray,
 6 that I was frustrated.
 7 Q. Yes.
 8 Was there any sense in which you were pushing for
 9 Building Control to endorse the proposals at an early
 10 stage because you yourself didn't feel confident in your
 11 own ability to spot problems? Was that any part of your
 12 thinking?
 13 A. I'm sorry, you're completely taking it out of context.
 14 The original email discussed the meetings we had had
 15 between Building Control and Max Fordham to discuss the
 16 smoke exhaust strategy, bearing in mind that that had
 17 been flagged by Exova from the very beginning --
 18 Q. Right.
 19 A. -- as a significant concern, and from my position as
 20 lead designer, I saw it as having a potentially huge
 21 knock-on to the feasibility of what we were doing.
 22 Q. Okay.
 23 Do you accept that, potentially due to your
 24 inexperience on projects like this, it just didn't occur
 25 to you that there might be compliance issues with the

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1 cladding proposals?
 2 A. Again, I can't see the context.
 3 Q. Pardon?
 4 A. I can't see the context for that question.
 5 Q. Well, we've looked at several emails, and there has been
 6 no discussion with Building Control about the cladding,
 7 and what I'm putting to you is: do you think that
 8 perhaps due to your inexperience it simply wasn't
 9 occurring to you that there might be compliance issues
 10 with the cladding proposals?
 11 A. I don't think we had planning approval yet for the
 12 scheme as a whole, so we weren't yet -- I mean, yes, we
 13 had -- we were trying to finalise our scheme, but
 14 I don't think we had -- am I confusing myself? No, at
 15 this point we were concentrating on the critical items.
 16 Q. And you didn't see cladding as a critical item from the
 17 point of view of Building Control approval?
 18 A. No, it is, of course it is. But to see it as
 19 a strategic issue at this point I don't agree is true.
 20 Q. Okay.
 21 Now, Claire Williams responds to you the same day.
 22 Can we look at that at {SEA00009814}. She says this:
 23 "Don't worry, I was only teasing. I am not sure if
 24 the building regulations chap is being lazy; or maybe he
 25 has had a run in with the fire bods and so wants to make

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1 sure they won't bat it back!
 2 "You are right, it is a major part of the scheme and
 3 we are being held back by this procedural glitch."
 4 Do you see that there?
 5 A. Yes.
 6 Q. Did you share her view that Building Control was being
 7 lazy? To be fair, she says, "I'm not sure if he is",
 8 but she raises that as a possibility. Did you think
 9 that?
 10 A. No.
 11 Q. Now, if we keep following the chronology of what was
 12 going on with Building Control, you then provided some
 13 further information relating to the fire strategy plans
 14 to Building Control on 3 December 2013. That's at
 15 paragraph 324 of your witness statement
 16 {SEA00014273/131}. Then you receive feedback from
 17 Paul Hanson on 31 December 2013.
 18 Can we look at your statement with this. It's
 19 paragraph 339 of your statement, {SEA00014273/139}. So
 20 there is a heading there:
 21 "Building control, fire safety and smoke ventilation
 22 between December 2013 and March 2014."
 23 You say:
 24 "Building Control provided feedback on BC P1 on
 25 31 December 2013 ..."

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1 And then you say what that included, and it included
 2 B1 means of escape observations and then a copy of
 3 a fire strategy drawing with comments in blue, and
 4 a copy of the fire access plans. Do you see that?
 5 A. Yes.
 6 Q. The BC P1, the P1 submission to Building Control, can
 7 you just explain what P1 means?
 8 A. That was the name given by Paul Hanson to his mark-up.
 9 Q. Okay, so that's like a code he has used for that
 10 particular submission to him?
 11 A. Yes.
 12 Q. We can see from your paragraph below that that you have
 13 summarised the feedback that you were getting and, in
 14 summary, Building Control were still saying it didn't
 15 have enough information to consult the LFB, and this is
 16 in relation to the smoke control system; is that
 17 correct?
 18 A. Yes, that was my understanding.
 19 Q. At paragraph 341, just a little further on, you say
 20 there:
 21 "I was surprised by the level of detail and effort
 22 that Building Control had gone to, which in my
 23 experience was unusual. We had not yet made the formal
 24 application. Building Control's engagement gave me
 25 comfort that, from a fire perspective and on the level

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1 of detail provided, there was nothing that might pose
2 a risk to the Project prior to the tender being
3 awarded."

4 Do you see that there?

5 A. Yes.

6 Q. We have been through the documents, and we have agreed
7 that the detail you had provided by that stage did not
8 cover the cladding, did it?

9 A. No.

10 Q. So is it right that, from a fire perspective, you
11 couldn't take any comfort from Building Control scrutiny
12 on that aspect of the proposals, could you?

13 A. Why not? I didn't ... I didn't see them as separate
14 departments on different sections.

15 Q. But how would Building Control even know that
16 overcladding was part of your proposals at this point?

17 A. I'm ... I can't evidence it, but I cannot -- I would
18 expect that at every introductory -- every engagement,
19 the introduction would describe the nature of the
20 project, which would include a description of the new
21 windows and the overcladding --

22 Q. But you hadn't provided any specific detail, had you, to
23 Building Control by this point?

24 A. No, but I --

25 Q. So there were no --

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1 A. You're asking me whether they ought to have known or
2 whether -- how they would have known, and I'm --
3 I believe I would have told them at the first meeting.

4 Q. That overcladding was part of the proposal?

5 A. That overcladding was part of the overall scheme.

6 Q. Would you accept that your main concern at this point
7 seemed to be maintaining momentum on the project?

8 (Pause)

9 A. This was New Year, New Year's Eve. Tenders had been
10 issued. What's the context for your question, sorry?

11 Q. Well, I'm asking you whether you thought your main
12 concern by this point was to maintain momentum on the
13 project?

14 A. The project was out to tender. We were awaiting tender
15 returns.

16 Q. Okay.

17 Now, we know that these comments from Paul Hanson
18 that he gave on 31 December 2013, they were passed from
19 Mr Crawford to Rydon much later in September 2014.

20 Do you know, had those comments been passed to Rydon
21 any earlier than that?

22 A. I can't --

23 Q. No.

24 A. Offhand, I can't remember, no.

25 Q. Let's move forward in time to February 2014.

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1 Would you agree that, during this period and up to
2 the submission of the full plans application, your
3 dealings with Building Control focused almost
4 exclusively on the smoke ventilation system and means of
5 escape?

6 A. I think I can only point to that P1 summary from
7 Paul Hanson. Those were the issues. I think it covered
8 a bit more than that.

9 Q. Can we look at a document, [EX000000621]. If you blow
10 up the top of that page, this is an email from you to
11 Claire Williams on 14 February 2014, and you say there:

12 "Please see attached our fire strategy drawings,
13 both the originals and the documents received from
14 Building Control. I would hesitate sending these as is
15 - they have taken a very conservative line and we
16 haven't begun further negotiations. I'm copying Terry
17 in - he may have an opinion."

18 So you have copied in Terry Ashton there; do you see
19 that?

20 A. Yes.

21 Q. On what basis were you saying there that they had taken
22 a very conservative line? Why did you say that?

23 A. I am afraid I'm just relying on my memory here, which
24 isn't ... I haven't obviously got it in front of me,
25 what was in the attachment, but I think in my report

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1 I discuss the marking of A and B that Paul Hanson had
2 given to various service risers and cupboards off the
3 central lobbies, suggesting he didn't want us to use
4 them, and I thought that that may pose a problem for us
5 in routing new services up the building.

6 Q. Okay.

7 I want to put to you that that seems to be quite
8 a dismissive comment about the Building Control
9 response. Would you accept that?

10 A. Dismissive?

11 Q. Yes, "they have taken a very conservative line".

12 A. No. Why would it be dismissive? We have to respect
13 Building Control.

14 Q. I see. So you're just stating as a matter of fact your
15 belief that they had taken a conservative line; is that
16 right?

17 A. I knew that we had to find routes for the new heating
18 pipes and water supply pipes, and that that detail
19 hadn't been fully resolved yet, and that may require
20 some enclosures to be created, or existing enclosures to
21 be reused, and in principle I couldn't see why that
22 couldn't be done.

23 Q. Okay.

24 A. As was done --

25 Q. Okay.

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1 A. -- in the event.
 2 Q. Now, keep moving forward with the chronology. On
 3 29 June 2014 you submitted an application to RBKC
 4 planning department for their approval for cassette
 5 fixed ACM panels. We don't need to go to that, but
 6 after that, you were in discussions with RBKC planning
 7 about the finish and colour of the ACM panels and the
 8 method of fixing; that's correct, isn't it?
 9 A. Yes.
 10 Q. Now, I want to go to an email towards the end of July,
 11 {SEA00000175}. This is an email from you dated
 12 24 July 2014 to John Allen of RBKC Building Control,
 13 copying in Neil Crawford and Simon Lawrence, informing
 14 him that Studio E would be leading on Building Control.
 15 Do you see that in the second paragraph?
 16 A. Yes.
 17 Q. So you say:
 18 "We understand that the client's budget is £8.5m.
 19 The application will be made by the design and build
 20 contractor, Rydon who are on site. Studio E's
 21 appointment has been novated to Rydon and we will be
 22 leading on gaining approval."
 23 That was leading on gaining Building Control
 24 approval; is that correct?
 25 A. Yes.

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1 Q. Yes. So was it your understanding at the time that it
 2 was Studio E's responsibility to liaise with
 3 Building Control?
 4 A. At that time, yes.
 5 Q. Now, in the next paragraph you say this, the last
 6 sentence of that email:
 7 "The fire strategy was a tricky subject and we would
 8 like to engage on this as soon as possible."
 9 Can you recall what you meant by that, the
 10 fire strategy was a tricky subject?
 11 A. I can't remember exactly what I thought at the time, but
 12 I believe I would have been referring to the outstanding
 13 smoke exhaust issue, which still presented a risk.
 14 Q. Right.
 15 Now, on 4 August 2014 you then submitted the full
 16 plans application form to RBKC. If we can go and look
 17 at the email which accompanied that, this is at
 18 {RYD00014378}. So this is you to John Allen, and it's
 19 headed, "Grenfell Tower Refurbishment, Full Plans
 20 Application" and you say:
 21 "... please see attached the completed Full Plans
 22 application form for Grenfell Tower. Hard copy and
 23 drawings to follow."
 24 Do you see that there?
 25 A. Yes.

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1 Q. Did you mean hard copy of the form and drawings to
 2 follow?
 3 A. That sounds like what I meant, yes.
 4 Q. And hard copies of the drawings also to follow?
 5 A. Yes.
 6 Q. Do you know whether hard copies of the drawings were
 7 ever submitted to the Building Control department of
 8 RBKC?
 9 A. I'm not sure.
 10 Q. You're not sure?
 11 A. I didn't submit them.
 12 Q. Okay.
 13 A. I can't --
 14 Q. Is that because it was Neil Crawford who was dealing
 15 with it at that point?
 16 A. Yes.
 17 Q. Do you know whether Studio E kept a record of exactly
 18 what drawings were associated with the full plans
 19 application?
 20 A. The way we conventionally do it is we would, for
 21 a significant issue, create a folder and put all the
 22 documents in it, so that you had a snapshot of that
 23 submission. So we normally would, yes, and I think we
 24 did.
 25 Q. Do you agree that it was important to keep a record so

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1 that you could check what information the
 2 Building Control body had been supplied with?
 3 A. Yes.
 4 Q. Now, let's just look at the form itself, {RYD00014379}.
 5 This is the form that goes in, and I believe it's signed
 6 but not dated.
 7 Is there another page to this document? No, sorry,
 8 if we go back, I've just seen where I meant.
 9 So can you see you have signed it --
 10 A. Second line.
 11 Q. -- in the middle, and there is your signature, but there
 12 is no date on it.
 13 A. Yes.
 14 Q. Do you know why there was no date?
 15 A. I understood that it would be enclosed with the cheque
 16 and the drawings as a hard copy, so I didn't date it.
 17 Q. You have said here in the box below that the date the
 18 work will start -- this is your handwriting here, is it?
 19 A. Yes.
 20 Q. The date the work will start is the week commencing
 21 18 August 2014; do you see that there?
 22 A. Yes.
 23 Q. But it's right, isn't it, that some work did start
 24 on site as early as 2 June 2014; is that correct?
 25 A. I can't recall exactly what work was being undertaken,

152

1 no.
2 Q. I think some demolition and mobilisation work had
3 started earlier than that. So you can't explain for us
4 why 18 August was picked as that date?
5 A. No. I can remember discussing this with Simon and him
6 asking me to complete it, but I can't remember the --
7 how the dates were arrived at.
8 Q. Do you agree on large projects it's common for
9 information and drawings to be supplied to
10 Building Control as the project progresses?
11 A. My understanding is there is usually an upfront
12 submission of drawings to establish the principles, and
13 thereafter the detail -- the finer detail of different
14 elements is issued over time, yes.
15 Q. Yes, and what I'm going to put to you is that that's
16 in fact what happened on the Grenfell Tower project,
17 that drawings and information were issued piecemeal
18 after that form had gone in; is that correct?
19 A. "Piecemeal" suggests incomplete, but I believe that is
20 typically how Building Control applications are dealt
21 with.
22 Q. Did you keep a tracker of which drawings and information
23 had been submitted to RBKC?
24 A. No. I didn't, no.
25 Q. Can you help us as to why not?

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1 A. The person managing the application is usually the one
2 who would -- may -- I mean, the option of a tracker
3 is -- it's a management device, and even discussing it
4 makes it sound like it's inevitable. It's not. But it
5 is commonly used as a way of tracking the items that
6 Building Control have agreed.
7 Q. It's right, isn't it, that there was no tracker kept by
8 Studio E of which drawings had been submitted to
9 Building Control?
10 A. Well, the tracker doesn't track the drawings; it tracks
11 the sections of the approved document which are relevant
12 and the dates of sign-off. In other words, so it's --
13 you're looking to tick all the rows that you have
14 agreed, all the items.
15 Q. But Studio E didn't operate one of those, did they?
16 A. No.
17 Q. Did Studio E keep any other form of record that would
18 allow you to check what had been submitted?
19 A. We do keep drawing issue sheets, and that would
20 typically apply on this issue as well. We would record
21 an issue on a drawing sheet.
22 Q. Okay. We're going to come back in a little while and
23 look at what was on the drawing issue sheet for
24 Building Control.
25 What I want to ask is: if you didn't have a tracker

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1 or another formal record, how were you going to ensure
2 that RBKC had all of the relevant information to be able
3 to decide whether the works complied with the
4 Building Regulations?
5 A. I repeat, I don't think the tracker is focused on the
6 documents as much as it is focused on the sections of
7 the approved document. So, for instance, you may
8 require very little to satisfy certain aspects and a lot
9 more on others. Each project will vary. And those
10 drawings and that information would come from various
11 sources.
12 Q. But without that kind of tool, whether it was as you
13 describe, how was Studio E going to satisfy itself that
14 all the relevant information had been provided to
15 Building Control?
16 A. I think this overlaps with Neil's evidence, and I think
17 he does comment on his engagement with Building Control
18 and how they wanted to handle the flow of information.
19 Q. Okay.
20 Now, if we --
21 SIR MARTIN MOORE-BICK: Do you think we ought to be having
22 a break soon?
23 MS GRANGE: Yes, I do, and I'm very conscious of that.
24 I was wondering whether I might be able to get to the
25 end of this topic and then break, but if you would

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1 rather break soon --
2 SIR MARTIN MOORE-BICK: Well, we have been running an hour
3 and ten minutes, and I think probably this is a good
4 moment.
5 MS GRANGE: Yes. Could we say 10 minutes? I'm just
6 conscious that we are --
7 SIR MARTIN MOORE-BICK: We have to be very careful about the
8 length of breaks, don't we? I think it would be unwise
9 to try and shorten them too much.
10 MS GRANGE: Okay, 15 minutes, then.
11 SIR MARTIN MOORE-BICK: Mr Sounes, we will have a break now.
12 We will come back at 3.40, please, and no talking about
13 your evidence or anything to do with it while you're out
14 of the room. All right? Thank you very much.
15 (Pause)
16 3.40, please. Thank you.
17 (3.25 pm)
18 (A short break)
19 (3.40 pm)
20 SIR MARTIN MOORE-BICK: All right, Mr Sounes, ready to go
21 on?
22 THE WITNESS: Yes.
23 MS GRANGE: Thank you.
24 Just picking up again on the topic of the full plans
25 application that went on in 5 August 2014, can we turn

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1 up a document, {SEA00011398}.

2 Now, this is an email at the bottom of the page from

3 John Allen to you:

4 "Thank you for the summary of costs ..."

5 The point I'm asked to put to you is: can you

6 confirm that Mr Allen at RBKC had asked you to submit

7 a set of drawings with the full plans application form?

8 A. Sorry, you're asking me if -- it's not mentioned there.

9 Q. No, I can see it's not mentioned there. Is there

10 a second page to this email? No. Can we go back to the

11 first page.

12 Yes, I think you get it actually from your response

13 to Rydon. Do you see you then forward this on to

14 Zak Maynard and Simon Lawrence of Rydon? In that last

15 paragraph you say:

16 "He wants a set of drawings to accompany the

17 submission but it probably makes sense to hold on the

18 drawings until we have confirmation on the flats and

19 ground floor changes."

20 Do you see that?

21 A. Yes.

22 Q. Can I confirm it was your understanding at the time that

23 Building Control had wanted a full set of drawings to

24 accompany the submission?

25 A. I think they would expect drawings, yes.

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1 Q. Yes.

2 Now, just before we get to the first big pack of

3 drawings that were submitted, can we look at

4 {SEA00000189}. This is an email, if we just blow it up,

5 from Simon Lawrence to John Hoban, copying you and

6 others in. This is where he is introducing himself,

7 Mr Lawrence, as the Rydon contracts manager. He says:

8 "We haven't been introduced properly yet, but I am

9 Rydon's Contracts Manager for the Grenfell Tower

10 project. I understand that you dropped into our site

11 office recently and had a brief introduction to the

12 project and drawings from our Project Manager,

13 Simon O'Connor."

14 Do you see that there?

15 A. Yes.

16 Q. In the final paragraph he says:

17 "Studio E are our Architects, lead designers who

18 will forward all relevant drawings, etc in the future.

19 I believe you already know them from your work on the

20 KALC project next door so hopefully this will make

21 things easier. I will ask them to arrange a meeting

22 with yourself on site shortly."

23 Do you see that?

24 A. Yes.

25 Q. It's suggesting in that first paragraph that John Hoban

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1 had popped into the site office and seen some drawings

2 on site. Were you aware of that at the time?

3 A. Not before. I can't recall being aware of it before

4 this email.

5 Q. He is saying in that very last sentence:

6 "I will ask them [that's you, Studio E] to arrange

7 a meeting with yourself on site shortly."

8 With John Hoban.

9 A. Yes.

10 Q. Did you have a meeting with him on site after this?

11 A. I didn't personally. I wasn't fronting it at that

12 point.

13 Q. Now, sticking with the chronology, the full plans

14 application goes in on 5 August 2014, that's the form.

15 Then on 24 September 2014, Neil Crawford sends a pack of

16 drawings to RBKC Building Control. Can we just look at

17 that, {RYD00018742}. This is, we can see from the top,

18 Neil Crawford to John Hoban. Now, you're not copied in

19 to that. Had you had a discussion with Mr Crawford

20 about which drawings would be sent to Building Control?

21 A. Oh, it's too long ago to remember a specific

22 conversation.

23 Q. Okay.

24 Were you aware that this first big pack of drawings

25 that went still had the cladding panels labelled as

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1 zinc?

2 A. Again, I wasn't thinking of it at the time. So I wasn't

3 aware of what was or wasn't on the drawing, although

4 I would have expected Neil to submit the tender set at

5 this stage.

6 Q. The tender set?

7 A. Set of drawings, yes.

8 Q. So that would have shown zinc, but events had moved on,

9 hadn't it? I mean, by this stage the ACM had very

10 clearly been selected, hadn't it?

11 A. We didn't have planning as yet, approval for the --

12 sorry, I can't remember the exact date offhand now for

13 the materials submission, but I don't think it was fully

14 confirmed. And in a first submission, you would expect

15 to follow up with more detail. So a general

16 arrangement, even if it's not -- sorry, a section or

17 elevation -- a detailed section or elevation, even if

18 not entirely accurate, would still be valid as a -- to

19 show the scope.

20 Q. I see.

21 Did you know that these drawings did not include

22 details of the insulation that was going to be used on

23 the columns or behind the spandrels?

24 A. I wasn't sure what was submitted, and if it's not on the

25 drawing in the form of an explicit note -- which wasn't

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1 our custom, our custom was to use NBS codes -- I guess
 2 I didn't know, no.
 3 Q. Okay.
 4 Had you known those things, that it was still
 5 labelled zinc and it didn't show what insulation was to
 6 be used, is that something you would have asked
 7 Mr Crawford to correct before the drawings went in?
 8 A. Not necessarily. I think typically individual items are
 9 considered in turn, and insulation was one of them. So
 10 just because it wasn't annotated on every drawing, it
 11 doesn't suggest that there's something missing.
 12 Q. My question was also about the zinc. Wasn't it
 13 important to send Building Control accurate information
 14 so that they could do their job properly?
 15 A. In the context of the first submission or in the context
 16 of subsequent submissions? Because I can't disagree
 17 with that statement. But this first -- as is usually
 18 the case, the first set of drawings is to provide the --
 19 specifically the fire strategy, and an overview of the
 20 project.
 21 Q. I see. So you didn't think it was important to be
 22 providing all the up-to-date details in that first
 23 submission?
 24 A. I don't think we were at the point of detailed design of
 25 the envelope at this point.

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1 Q. I'm not talking about detailed design, I'm talking about
 2 the selection of the materials to be used.
 3 A. I think those were in Building Control's mind, as in our
 4 mind, to some extent deferred. So, no, I don't think it
 5 was essential that your submission was 100% consistent
 6 with what you were going to build.
 7 Q. Okay.
 8 Now, in fact we can see from the documents, that
 9 pack of drawings goes on 24 September 2014, and on
 10 25 September 2014, the very next day, the planners
 11 approved the smoke silver ACM panels. They had
 12 previously been going towards the champagne colour, and
 13 then on 25 September it was the smoke silver ACM panels
 14 that were approved. For the transcript, that's at
 15 {IBI00001802}.
 16 That was clearly an important milestone in the
 17 project, wasn't it?
 18 A. Yes.
 19 Q. The approval of those ACM panels.
 20 Did it occur to you at the time that Studio E would
 21 need to update Building Control of the change from zinc
 22 to ACM?
 23 A. I repeat, I think each item is considered in turn, and
 24 they would need more detail than what was provided on
 25 our GA set, I believe, to confirm their agreement.

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1 Q. Okay.
 2 Did you ever tell Building Control that there had
 3 been a change from zinc to ACM?
 4 A. I can't recall having conversations, no.
 5 Q. By this stage, we know you had received a copy of the
 6 BBA certificate. Do you agree that the BBA certificate
 7 should have been sent on to Building Control?
 8 A. I repeat, the elements of the construction are usually
 9 considered in turn -- so, for instance, whether it be
 10 mechanical aspects, obviously the cladding, the
 11 windows -- and each would be submitted with relevant
 12 details to Building Control to confirm agreement.
 13 Q. Yes, and I'm asking: was the BBA certificate ever
 14 submitted to Building Control, because we can't see any
 15 record that that ever happened?
 16 A. I'm not sure. Obviously I was not --
 17 Q. And you never checked with any colleague that that had
 18 been done?
 19 A. No.
 20 Q. During his oral evidence, Mr Crawford said he understood
 21 from conversations with you that Building Control were
 22 aware of the façade design and the materials specified
 23 to be used within it before the full plans application
 24 was made in August 2014. He said that on {Day11/141}.
 25 Now, is that right? Had you told Mr Crawford that

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1 Building Control were aware of the façade design and the
 2 materials specified to be used within it before the full
 3 plans went in?
 4 A. The only comment which I've just made is that I believe
 5 I would have explained the nature of the refurbishment,
 6 but I can't recall any instance where I discussed the
 7 materials with Building Control.
 8 Q. Okay.
 9 Now, we know that following the submission of the
 10 full plans application you handed over responsibility
 11 for liaising to Neil Crawford. Did you retain any
 12 oversight of what he was doing on Building Control
 13 issues?
 14 A. No, not on an ongoing basis. No, I was monitoring, as
 15 in I was copied in, but I wasn't checking.
 16 Q. No, okay.
 17 Did you personally ever meet with Mr Hoban to
 18 discuss the cladding for the project with him?
 19 A. No. I think I had the one meeting with John Hoban.
 20 I can't remember the date now, but it was well in
 21 advance of the application.
 22 Q. So you can't recall ever discussing the cladding with
 23 Mr Hoban, you personally?
 24 A. No.
 25 Q. Or Approved Document B, you didn't have any discussions

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1 with him about that?

2 A. I think it was a meeting with Matt Smith from

3 Max Fordham, one of the early meetings, I believe I met

4 with John Hoban, but I ...

5 Q. I see.

6 A. I do not recall the contents of -- apart from what's

7 noted in minutes and emails, I can't remember --

8 Q. Okay?

9 A. -- specifically .

10 Q. Mr Crawford said in his oral evidence that he had

11 workshops on site with Building Control to discuss the

12 cavity barrier strategy. He said there had been one of

13 these workshops before Christmas in 2014 and one in

14 mid-February 2015, and he thought another one in late

15 March/April 2015. That was at {Day11/14:2} and

16 following.

17 Did you attend any such workshops with

18 Building Control?

19 A. No.

20 Q. Do you recall Mr Crawford attending them? Were you

21 aware that he was attending workshops with

22 Building Control in those times?

23 A. I can't be precise. I knew he was visiting site, but

24 I can't be precise.

25 Q. Can you help us as to why there might be no written

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1 record of any such workshops with Building Control

2 having taken place on those occasions?

3 A. No.

4 Q. Now, just before I finish this topic, I want to turn to

5 one specific issue about the rating of the cavity

6 barriers.

7 We have already been through some questions about

8 Harley's query in March 2015 about the cavity barriers,

9 whether they should be 120 minutes or 30 minutes.

10 Now, on 6 March you were cc'd in to some further

11 emails from Neil Crawford where he was trying to find

12 out the answer to Harley's queries. I want to look at

13 an email you sent, {SEA00012915}.

14 If we can look at that email at the top of the page,

15 this is you in March 2015 to Neil Crawford and

16 Simon Lawrence, and you're saying there:

17 "I went to Ecobuild yesterday and stopped at the

18 stand of Fill Metalbau. They had a large picture of

19 Great Arthur House (Golden Lane Estate) on their wall."

20 Then in the second paragraph you say:

21 "Also quite prominent on the wall was a UK resi

22 tower overcladding project. He explained that Mulally

23 had screwed up and Kier (I think it was) had called Fill

24 Metalbau in to replace every panel and make good on a

25 time charge basis. Franz made several disparaging

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1 comments about Mulally workmanship."

2 The last bullet point you have there is, "No fire

3 stops", do you see that?

4 A. Yes.

5 Q. You say:

6 "I'm sure Paul Hanson is going to be very particular

7 about fire stops at Grenfell Tower."

8 Do you see that?

9 A. Yes.

10 Q. What did you mean when you said this about Paul Hanson

11 being particular about firestops? Wasn't it John Hoban

12 who was leading on the cladding?

13 A. No, most of the meaningful engagement I had had up to

14 that point was with Paul Hanson.

15 Q. I see.

16 A. I thought he led that department. That was my

17 impression.

18 Q. Right.

19 Was this email intended by you as a strong prod to

20 Neil Crawford and Simon Lawrence to get it right in

21 terms of the firestopping within the overcladding? What

22 was the purpose for you sending this email?

23 A. I actually think it may have something to do with Great

24 Arthur House. That's where I think it might have

25 started. I think Rydon had bid for that project with

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1 Harley, and I think I had learnt that by then. And,

2 of course, I was just relating some of the information

3 from -- and of course Mulalley were one of the tenderers

4 on the contract -- on the Grenfell Tower, and that was

5 really the extent of the interest -- of the email.

6 Q. In the light of that email, did you ever check what

7 information had been provided to RBKC Building Control

8 about cavity barriers at this point?

9 A. No.

10 Q. Okay.

11 I want to move on to some different topics.

12 Just very quickly, the Building Control Alliance,

13 did you know that at the time of the Grenfell project

14 the Building Control Alliance, the BCA, had issued

15 guidance documents for the construction industry? Did

16 you know that?

17 A. No.

18 Q. Did you ever read a BCA guidance document entitled,

19 "Technical Guidance Note 18: Use of Combustible Cladding

20 Materials on Residential Buildings"? It was dated

21 June 2014.

22 A. No.

23 Q. No, okay.

24 Handover to Mr Crawford, this is my next topic.

25 You have said that from July 2014 Neil Crawford

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1 began to take on the role of the Studio E day-to-day
 2 contact on the project; that's correct, isn't it?
 3 A. Yes.
 4 Q. Why was it that you became less involved in the project?
 5 A. I obviously moved on to other things. I'm sorry I can't
 6 give you more detail, I haven't tried to focus on that.
 7 Q. Did it reflect a decision made within Studio E to
 8 allocate more junior resources to the project and divert
 9 more senior resources to other work?
 10 A. No. Neil had, to a large extent, performed my role on
 11 Grenfell from the beginning on the KALC project, so he
 12 had, with Andrzej, fronted the academy project, and he
 13 had seen it through to completion. I wouldn't regard
 14 Neil as junior, so I don't agree with your statement.
 15 Q. Okay.
 16 Now, Mr Crawford has told us, at paragraph 25.1 of
 17 his statement {SEA00014275/10}, that according to his
 18 Outlook calendar, on 13 August 2014, you and him had
 19 a handover discussion meeting regarding the project. Do
 20 you recall that meeting?
 21 A. Possibly, but not -- most conversations I can't recall.
 22 Q. Do you recall planning what you were going to say to
 23 Mr Crawford at that handover meeting about what remained
 24 to be done on the project?
 25 A. No. I mean, there would have been a point at which we

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1 sat down, but here I'm trying to reconstruct it.
 2 Q. Okay.
 3 A. But there would have been a point --
 4 Q. Do you recall anything about the content of that
 5 handover meeting?
 6 A. No.
 7 Q. Do you think you might have told Mr Crawford that there
 8 was relatively little left to do on the project?
 9 A. I don't think that was my impression at the time.
 10 Q. Was there a standard procedure within Studio E for how
 11 these handovers happened or was it done on an informal
 12 basis?
 13 A. I would say it was informal because it took place over
 14 a period and there was no sudden handover. I didn't
 15 disappear; I was always available.
 16 Q. So does it follow that you can't really tell us anything
 17 now about what was included as part of that handover and
 18 what you discussed?
 19 A. I -- no, I can't remember anything in detail.
 20 Q. Just one specific point: did you instruct Mr Crawford
 21 that Exova would need to update their outline fire
 22 strategy analysis, do you remember having that
 23 conversation with him?
 24 A. No, I don't believe I did.
 25 Q. You don't believe you did have that?

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1 A. No.
 2 Q. Did you ever tell Mr Crawford what the bespoke terms
 3 were which Rydon had proposed in 2014? Do you remember
 4 discussing the terms of the Rydon appointment with
 5 Mr Crawford?
 6 A. I might have done, but I can't remember.
 7 Q. So you don't recall going through the terms and checking
 8 that Mr Crawford had understood what he was to do in the
 9 schedule of services that was attached to that?
 10 A. No, I don't think I did.
 11 Q. Okay.
 12 Can we go to an email, this is {SEA00013741}. This
 13 is an email to you from Daniel Banks on
 14 14 December 2015, and he says to you:
 15 "Thank you for your email.
 16 "I am conscious we have outstanding appointments and
 17 warranties for the following jobs:
 18 •" Lea Bridge Road
 19 •" Froggnal Place
 20 •" Grenfell Towers
 21 "You have previously commented upon the form of
 22 warranty and deed of appointment."
 23 Those other projects being mentioned there,
 24 Lea Bridge and Froggnal Place projects, can you remember
 25 how big those projects were?

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1 A. Lea Bridge was quite a substantial project, but I ...
 2 and I won't hazard a guess as to the value, but it was
 3 in Walthamstow, a police station, or police station that
 4 had been converted into a hostel with two new-build
 5 blocks next -- either side.
 6 Froggnal Place, it was a change of use and mostly
 7 internal alterations to a series of units.
 8 Q. Yes.
 9 A. But I can't, I wouldn't hazard a value of that.
 10 Q. If it helps, these other projects on Rydon's websites
 11 were said to be £7 million and £6.1 million projects
 12 respectively, so they're not small projects, are they?
 13 A. I didn't realise Froggnal was that scale.
 14 Q. What I want to ask you is: did Studio E's work on these
 15 other projects affect the extent to which it was able to
 16 devote resources to the Grenfell project?
 17 A. There were different people involved completely.
 18 Q. Was that the reason why Mr Crawford appears to have been
 19 effectively the sole Studio E professional engaged on
 20 the project from July 2014 onwards?
 21 A. I don't connect the Lea Bridge and Froggnal Place
 22 projects with Grenfell. Had Neil required resource, he
 23 would have got it to assist.
 24 Q. So you don't think that resourcing within Studio E
 25 affected the extent to which you were able to service

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1 the Grenfell project --
 2 A. No.
 3 Q. -- after July 2014?
 4 A. Not at all.
 5 Q. Okay.
 6 Quality assurance and document control. ISO 9001 --
 7 are you familiar with ISO 9001 on quality management
 8 systems?
 9 A. I'm not very familiar with it, but I know of it.
 10 Q. I see.
 11 Do you know if during your involvement on the
 12 project a quality management system was in place in
 13 accordance with ISO 9001 within Studio E?
 14 A. We had a system which was audited, which I think
 15 includes what you referred to.
 16 Q. Okay.
 17 I want to ask you some questions about documentary
 18 control processes and output.
 19 Do you agree that a quality assurance system
 20 compliant with the standards of ISO 9001 would demand
 21 a structured, accessible and well-maintained document
 22 control system?
 23 A. Yes.
 24 Q. Are you familiar with the RIBA Handbook of Practice
 25 Management, ninth edition? Can we have a look at that,

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1 this is at {INQ00011309}, and I want to look on page 135
 2 {INQ00011309/135} at paragraph 11.2.3 under the heading
 3 "Project-related risks".
 4 In that second paragraph, this is what I wanted to
 5 draw your attention to, it says:
 6 "Particular attention should be paid to establishing
 7 a good document storage and retrieval system, which will
 8 make documents easy to find should suggestions of breach
 9 of duty be made, and that a clear record is maintained
 10 showing exactly what was issued to whom, and when."
 11 Do you see that there?
 12 A. Yes.
 13 Q. Would you agree that that was important?
 14 A. Yes.
 15 Q. And were you aware of that at the time you were working
 16 on the Grenfell project?
 17 A. I can't say I was aware of that paragraph, but the
 18 principle is certainly one I was aware of.
 19 Q. I think we touched on it earlier: do you agree that,
 20 through the life of an architectural project, all
 21 documentation issued to clients, consultants and
 22 statutory authorities should be recorded on a drawing
 23 issue register?
 24 A. That's the convention. I wouldn't say it's
 25 a requirement, but that's a convention which goes back

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1 a long way to recording issues.
 2 Q. Do you agree that it should contain the names of
 3 recipients of those drawings and the dates that they
 4 were sent?
 5 A. That's usually what's contained in a drawing issue
 6 sheet, yes.
 7 Q. Can we then look at the document, {SEA00013512}, and
 8 I need the offline version. It's a document entitled
 9 "Document register and issue advice".
 10 If we look on the right-hand side, at the top, we
 11 can see this is a Studio E document, and it has a number
 12 of dates on the top right-hand side. We can see the
 13 register runs from 12 September 2013 through to
 14 29 October 2014 -- actually it goes, if we go to page 4
 15 {SEA00013512/4}, beyond that to 6 July 2015. If we can
 16 see that at the top, it's running through to 2015.
 17 Now, if we scroll down to the bottom, we can see the
 18 distribution list on page 2 {SEA00013512/2}. Do you see
 19 that there?
 20 A. Yes.
 21 Q. It appears from the face of this document that there is
 22 no record of any information issue being made to either
 23 Exova or RBKC Building Control. They are outlined here
 24 on this distribution list. Do you see that?
 25 A. Yes.

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1 Q. So it doesn't seem to record at any time throughout that
 2 period, September 2013 to July 2015, what information
 3 was issued to Building Control or Exova.
 4 Now, is it right that the document register and
 5 issue advice should have recorded key milestones in
 6 terms of the issue of documents?
 7 A. Yes.
 8 Q. And do you agree that it should have recorded those
 9 drawings issued to Exova and to Building Control,
 10 for example the pack of drawings that was sent on
 11 24 September 2014 following the full plans application?
 12 A. Yes.
 13 Q. Would you agree that the failure to record what drawings
 14 were issued to Building Control and Exova is a serious
 15 omission on Studio E's part?
 16 A. It would be an omission if there was no record, but
 17 I believe there are records.
 18 Q. I see.
 19 A. So it is not good practice to not maintain a drawing
 20 issue sheet, but there is a record.
 21 Q. Do you mean there are records because we can look back
 22 at emails and piecemeal?
 23 A. Yes, yes.
 24 Q. I see. But you are accepting that it wasn't good
 25 practice because good practice would have meant

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1 including it in this kind of register?

2 A. Yes.

3 Q. That's fair, thanks.

4 So do you agree that it's not possible to determine
5 by looking at this register whether Building Control or
6 Exova might have been missing any particularly key
7 documents?

8 A. Yes.

9 Q. Now, quality assurance and technical reviews, I want to
10 ask you some questions about Studio E's system of
11 internal reviews. If we look at your witness statement,
12 {SEA00014273/62}, and I want to look at paragraph 130.

13 So you say here:

14 "I should also note that Studio E has an internal
15 technical review process, which involves a design review
16 and a technical review by Studio E employees not
17 otherwise involved in the Project. Internal reviews are
18 part of our ISO 9001 Quality Assurance process. They
19 are conducted at key stages in the project and are
20 intended to be a peer review of the work in progress, to
21 share thoughts and cross check that all relevant issues
22 are being considered. I carried out a technical review
23 for the Project after Neil became involved. This is
24 discussed further below."

25 Do you see that there?

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1 A. Yes.

2 Q. So you're talking about both design reviews and
3 technical reviews, and is it correct that a technical
4 review will focus on technical considerations such as
5 the choice and arrangement of materials and components
6 to achieve the performance objectives, such as thermal
7 insulation, weather protection and fire safety?

8 A. The design review would normally --

9 Q. I'm talking about the technical review, sorry.

10 A. The technical review would obviously occur when the
11 project is ideally approaching site. So, yes, it would
12 include an overview of any technical aspect.

13 Q. Do you agree that such reviews would seek to ensure that
14 the construction documentation -- ie the drawings,
15 schedules, specification -- are in all respects
16 functional and fit for purpose and fully compliant with
17 the relevant standards and statutory requirements?

18 A. That's a massive ask. I wouldn't -- I don't believe our
19 QA was quite so extensive.

20 Q. Do you agree that technical reviews might be informal,
21 taking place at short notice to discuss a particular
22 aspect of the work?

23 A. They wouldn't be necessarily at short notice or even of
24 short duration. They may focus on specific issues which
25 one or other party thinks is more relevant than others.

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1 Q. I see. Do you agree that they could also be formal
2 scheduled events which are documented?

3 A. They were meant to be documented, yeah.

4 Q. Yes.

5 Is it fair to say that without any formal technical
6 review process, there is no way of monitoring the
7 quality of the work that's produced?

8 A. That's a bit -- that's a bit blanket. I think
9 everything any architect's office produces is monitored
10 day by day. The technical review is -- or the QA is
11 a way of making sure that something hasn't been missed
12 and that everything has been done as expected. It's
13 a --

14 Q. I see.

15 Now, if we look at paragraph 131 of your witness
16 statement, three lines down from the beginning you say
17 there:

18 "Based on our quality management system, I believe
19 that our internal design and technical reviews for the
20 Project took place in February 2013 and October 2015
21 respectively ..."

22 Do you see that?

23 A. Yeah.

24 Q. Then you say:

25 "... however there was likely to have been some

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1 discussion of the Project at the KALC design and
2 technical reviews held on September 2012 ..."

3 Do you see that?

4 A. Yeah.

5 Q. Is it right that there was only one technical review on
6 the Grenfell Tower project and that was in October 2015?

7 A. Yes.

8 Q. You discuss the October 2015 review at paragraph 470.6
9 of your statement at page 182 {SEA00014273/182}, and you
10 say:

11 "On 28 October 2015, I took part in an internal
12 technical review of Studio E's work on the Project;
13 Neil Crawford (Studio E) issued the internal report the
14 next day, using the office template document, which we
15 would have both used as a checklist to discuss and agree
16 whether there were any areas that needed to be
17 investigated further. I note it contained a comment
18 regarding design standards and that it was 'designed to
19 current housing, approved document building regulations
20 and British standards.'"

21 Do you see that there?

22 A. Yes.

23 Q. What I want to do is just look at the contemporaneous
24 record of that review, {SEA00013508}. If we look at the
25 top of the document, you are there recorded as the

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1 assessor in the middle of the page, and Mr Crawford is
2 recorded as the project architect.

3 Can you explain why no one more senior at Studio E
4 was involved in that technical review?

5 A. The only ones more senior were Andrzej or
6 David Lloyd Jones, but I don't -- I think that's -- that
7 was -- agree, that's an acceptable level of seniority.

8 Q. You think that's an acceptable level of seniority to be
9 doing the technical review, is that what you're saying?

10 A. Yes, yes.

11 Q. Was it common at Studio E for no more senior person to
12 conduct them, for example a partner or director?

13 A. Not necessarily, no.

14 Q. Okay.

15 Now, as at October 2015 we know from other documents
16 that the work to the external façade was 60% complete
17 approximately. So this first technical review appears
18 to be undertaken when the construction of the external
19 façade was 60% complete. Does that sound about right?

20 A. I can't dispute that.

21 Q. Now, Mr Kuszell said in his witness statement at
22 paragraph 24.2 {SEA00014271/7} that a technical review
23 usually occurs at RIBA stages E/F.

24 Would you agree with Mr Kuszell that that's normally
25 the stage where a technical review would be carried out?

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1 A. Yes.

2 Q. So that would have been in late 2013/early 2014, before
3 Studio E was appointed by Rydon; is that correct?

4 A. Yes.

5 Q. Would you agree that if the technical review meeting --
6 and I think we have agreed it -- was the first such
7 review, the meeting on 28 October 2015, then it's been
8 carried out far too late in the project?

9 A. It is late, yes.

10 Q. Were you aware of that at the time you were doing it?

11 A. Yes.

12 Q. Now, if we go back to this technical review and look at
13 page 2 {SEA00013508/2} under the heading "Project
14 Documents", it states in relation to
15 Building Regulations assessment:

16 "Building Control sign off-drawings have been issued
17 and incrementally signed off/agreed on site."

18 Do you see that?

19 A. Yes.

20 Q. Would you agree that that is in fact incorrect and that
21 there had not been any sign-off of drawings by
22 Building Control by this stage, had there?

23 A. I don't think that Building Control issue anything until
24 the final certificate, so you may be justified in
25 thinking you have had something signed off without

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1 a document.

2 Q. So what do you mean there by, "Building Control
3 sign off-drawings have been issued and incrementally
4 signed off/agreed on site", what does that mean?

5 A. I think "sign off-drawings" is -- the hyphen is
6 confusing. I read that as the drawings that have been
7 submitted to Building Control incrementally and have
8 been signed off/agreed on site. Does that clarify it?

9 Q. Not entirely. What I want to put to you is that that's
10 a misleading summary of the statutory approval process,
11 that Building Control hadn't been signing off drawings
12 agreed on site.

13 (Pause)

14 A. To the extent that you wouldn't get a signature for
15 a drawing from Building Control, I agree it's true, but
16 I think it is accurate to say that it is an incremental
17 procedure and it was ongoing at this stage.

18 Q. Okay. So are you really saying there was some kind of
19 implicit sign-off by Building Control? Is that what
20 you're trying to say?

21 A. Yes.

22 Q. Now, at the bottom of the page, we have got "Design
23 Standards" and there is a comment there. It says:
24 "Designed to current Housing, Approved Document
25 Building Regulations and British Standards where

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1 applicable."

2 Do you see that there?

3 A. Yes.

4 Q. Now, you have said, "Approved Document Building
5 Regulations"; did you mean it's been designed in
6 accordance with the Approved Documents, and also it
7 meets the Building Regulations?

8 A. That would be my understanding, yes.

9 Q. But I think you told us earlier today that in terms of
10 compliance with part B, it hadn't been designed in
11 accordance with Approved Document B for fire.

12 A. No, I thought it had. I think that's accurate. We
13 believed that we were designing in accordance with
14 Approved Document B.

15 Q. But you certainly told us in the context of the cavity
16 barriers today that you found the guidance confusing and
17 that you hadn't used it for that aspect of the works.

18 A. No, I disagree. I don't think the approved document can
19 be used so literally. That was my point.

20 Q. Okay. Well, again, I'm going to suggest that, in the
21 light of what you have told us today, it's not correct
22 to have recorded there that the design standard included
23 the approved document if in fact you knew that, for
24 certain aspects of the work, you hadn't followed that
25 practical guidance.

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1 A. No, I'll repeat that there is no specific guidance in
2 the approved document dealing with a rainscreen overlaid
3 or rainscreen cladding. It requires some degree of
4 interpretation.

5 Q. Right.

6 Now, as matters stood, the latest advice you had had
7 from Exova was in issue 3 of the outline fire safety
8 strategy, wasn't it?

9 A. By this stage we had had obviously subsequent emails,
10 but formally, yes.

11 Q. Did you look back and think about the fact that, on B4,
12 Exova's work was still incomplete because there was due
13 to be an analysis in a future issue of their report?

14 A. No, because Exova had been asked to prepare a strategy
15 document.

16 Q. So on what basis did you think in this technical review
17 that, in terms of fire, there had been compliance with
18 the Building Regulations and the approved document?

19 A. Well, you're asking me again: how can we believe that
20 it's compliant if we haven't determined it ourselves,
21 and I repeat that that I don't believe was our role.

22 Q. I see. So what are you actually doing in this technical
23 review? What's the process by which you're commenting
24 there?

25 A. It's a summary of the design standards that we believe

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1 were applicable.

2 Q. Okay.

3 Turning to page 3 {SEA00013508/3}, under the heading
4 "Technical Performance", there is a section "Fire
5 Detailing", and it says there:

6 "Fire Detailing. Comment: Completed."

7 Do you see that there?

8 A. Yes.

9 Q. Do you know what that comment relates to?

10 (Pause)

11 A. I can only point to the column -- the left-hand box
12 which says "Fire Detailing", and that would cover
13 internal and external fire sealing and cavity barriers.

14 Q. By this time, the detailing of the cavity barriers was
15 not complete, was it? We have seen there were ...

16 A. October 2015, I think we believed it was.

17 Q. I see, okay.

18 What about any more informal technical reviews?

19 Were you aware of any such informal technical reviews
20 occurring?

21 A. No, I can't remember anything offhand.

22 Q. Just in terms of what documents you had to hand when you
23 were working, I think there was mention in Mr Crawford's
24 evidence of the fact that you worked on a paperless
25 basis, you worked predominantly electronically; is that

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1 correct?

2 A. I think we certainly -- I don't think anyone's
3 paperless, but I tried to ensure that there was always
4 a digital record.

5 Q. Yes.

6 Would you ever have had any hard copy documents to
7 hand, like really key documents on the project,
8 for example the outline fire safety strategies by Exova
9 or the NBS specification? Would you ever have those in
10 hard copy?

11 A. Yes. Usually you would -- I would keep hard copies of
12 documents that I would -- might need with me at
13 meetings. That's usually ...

14 MS GRANGE: Now, Mr Chairman, I have two very short
15 topics -- very short topics --

16 SIR MARTIN MOORE-BICK: Yes.

17 MS GRANGE: -- before I finish my questions. Perhaps
18 I could be permitted to finish those --

19 SIR MARTIN MOORE-BICK: All right. Then we will see where
20 we have got to.

21 MS GRANGE: -- and then see where we are.

22 In Mr Kuszell's evidence that he gave on 2 March, he
23 told the Inquiry that a company called Croner had
24 carried out a review of Studio E's health and safety
25 procedures in 2013. Do you recall that review ever

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1 having taken place?

2 A. I have to say, yes, I recall conversations surrounding
3 Croner. I was not familiar with what they did in
4 detail.

5 Q. So you don't know what that review covered?

6 A. Not in detail, no.

7 Q. Can we look at an email, SEA00005947/2. Is there no
8 page 2? I'll come back to that email in a moment.

9 It's an email in which -- I don't know whether you
10 recall it -- you contact Croner as the point of call for
11 CDM-related issues --

12 A. Yes.

13 Q. -- and ask for some input on the issue, and then Croner
14 come back to you and basically say they can't give
15 CDM-specific advice for projects, that's not what they
16 do. Then you appeared to be rather annoyed about that.
17 Do you recall that exchange?

18 A. Yes.

19 Q. Is it right that you felt that Croner had failed to
20 perform for Studio E at the time in terms of not giving
21 advice on CDM-related issues?

22 A. No, I don't think my annoyance was with Croner, I --

23 Q. Who were you annoyed with?

24 A. I understood that we were ... we had appointed somebody
25 to provide CDM advice, and that was -- it was

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1 an obligation on us to do that, and on Grenfell Tower we
 2 knew we had an issue with opening windows, and I wanted
 3 to get some input on that specific issue of safety and
 4 opening windows --
 5 Q. Right, yes.
 6 A. -- in a residential context, and they weren't prepared
 7 to give it.
 8 Q. In terms of the CDM Regulations, do you accept that, as
 9 a designer, Studio E was responsible for design and
 10 complying with the CDM Regulations 2007 --
 11 A. Yes.
 12 Q. -- and liaising with the appointed CDM co-ordinator --
 13 A. Yes.
 14 Q. -- on the project?
 15 Do you accept that Studio E, as designer, was
 16 responsible for ensuring that a design risk assessment
 17 was compiled and reviewed, revised, updated as and when
 18 appropriate?
 19 A. Yes.
 20 Q. Now, we can see that Studio E did a design risk
 21 assessment. Can we look at that. This is at
 22 {TMO10003944}. It's dated 23 October 2013. If we look
 23 at the first entry at the top, "Fire risk during works",
 24 do you see that there?
 25 A. Yes.

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1 Q. Do you agree that there is very little detail there
 2 about the fire risk during the work?
 3 A. In terms of us identifying the potential risks?
 4 Q. Yes.
 5 A. There's not much detail, I agree, yes.
 6 Q. If we look at page 3 {TMO10003944/3}, the section for
 7 fire, 15c, 15d and 16a, there is a reference there,
 8 "Fire-fighting strategy: review". Do you see that
 9 there?
 10 A. Yes.
 11 Q. Do you know what that was referring to?
 12 A. I can only assume that's -- I can't assume, but I think
 13 that would be referring to the fire appliance access to
 14 the tower.
 15 Q. Do you know whether this risk assessment schedule was
 16 ever updated during the project?
 17 A. I can't recall, no.
 18 Q. Did you ever think to update it when the cladding
 19 changed from zinc to ACM or when the insulation changed
 20 from FR5000 to RS5000?
 21 A. No. There's -- I don't think there are any products
 22 mentioned in the risk assessment.
 23 Q. Did anyone ever ask you to update it?
 24 A. No.
 25 Q. Just going back to those Croner emails, this is

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1 {SEA00005449}, and it's the second email down. So you
 2 have emailed him, Martin Somerfield of Croner, saying:
 3 "I understand you are our point of call for CDM
 4 related issues. I hope you are able [to] give us some
 5 input on this one."
 6 Then if we can go up an email to the next one up, he
 7 says:
 8 "Hello Bruce
 9 "I'm actually on holiday at the moment for some
 10 reason my auto reply is not working. I did point out to
 11 Cathrin that I cannot give specific CDM advice for
 12 projects, that's not what we do."
 13 Do you see that there?
 14 A. Yes.
 15 Q. "You should refer any design issues to the CDM
 16 Co-ordinator for the project and the Principal
 17 Contractor."
 18 Sorry, I think we're still missing an email at the
 19 top of the page then where you express some annoyance at
 20 that response. Can you recall that?
 21 A. Yes, yes, I think I outlined it -- I just outlined it.
 22 I thought that that was the sort of advice that we were
 23 getting from Croner. That wasn't in a -- my irritation
 24 wasn't directed at Croner.
 25 Q. It was directed at who?

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1 A. Studio E.
 2 Q. I see, because you were frustrated that they hadn't
 3 engaged Croner to give you that kind of advice?
 4 A. No, I thought that's what we were getting, but it
 5 appeared we hadn't got specific CDM advice. Maybe I had
 6 been misled as to what Croner were going to offer.
 7 Q. I see.
 8 Mr Soules, the last question I want to ask you is:
 9 we have been now through an awful lot of the
 10 contemporaneous material from the project over a number
 11 of days. In the light of all that, I want to ask you
 12 and give you the opportunity to say whether you would
 13 have done anything differently if you had had the chance
 14 to do it again?
 15 A. Obviously I've had a long time to think about this.
 16 I think ... I think it's a very cruel question.
 17 (Pause)
 18 I said -- I sat through and I watched all of the
 19 fire experts' evidence, and then much -- in fact, quite
 20 a bit later, I studied the DCLG tests, and in a sense
 21 that was more revealing, but I had no idea.
 22 Q. Yes.
 23 A. And I don't believe anyone involved in the project would
 24 have not acted had we known.
 25 Q. Okay. Yes. Thank you for that.

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1 A. Okay.
 2 MS GRANGE: Mr Chairman, that concludes my questions.
 3 SIR MARTIN MOORE-BICK: Yes.
 4 MS GRANGE: Actually, I'm terribly sorry, there is one more.
 5 There was one more question that I said I would ask.
 6 Sorry, can I just finish that one more question?
 7 Maybe we should discuss this now. We're going to
 8 have to have a break, as is customary.
 9 SIR MARTIN MOORE-BICK: Let's see where we are going now.
 10 I think, Mr Sounes, you probably understand, because
 11 you have been following our work from time to time, that
 12 when a witness gets to the end of his evidence, we have
 13 to have a break of a reasonable length --
 14 THE WITNESS: Yes.
 15 SIR MARTIN MOORE-BICK: -- to allow people following
 16 the Inquiry from other places to put questions for
 17 consideration by our own counsel.
 18 Now, in the situation we're in now, that would have
 19 to be about 15 minutes, and then we often find that
 20 another series of questions should be asked and that
 21 could take another 15 minutes.
 22 Now, I sense you have had a long day already, and
 23 one of the options that we must consider is whether it
 24 would be wise to stop now but ask you to come back
 25 tomorrow morning just to field any additional questions

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1 that might have cropped up over the interim.
 2 Now, you could do that. It shouldn't take very
 3 long. It would obviously be inconvenient for you to
 4 come back again tomorrow morning. On the other hand,
 5 you might feel slightly more robust having had a break
 6 overnight.
 7 So I had already told Ms Grange that I thought we
 8 should finish at 4.45 at the latest because I was
 9 concerned about your becoming rather tired to deal with
 10 other questions. Tell me how it strikes you: would you
 11 be content to come back tomorrow morning?
 12 THE WITNESS: I would very much like to finish.
 13 SIR MARTIN MOORE-BICK: I'm sure you would, but just bear in
 14 mind that this could go on a bit.
 15 MS GRANGE: Mr Chairman, I understand there may be some
 16 operational issues that we need to consider about
 17 whether it's feasible to have Mr Sounes back tomorrow
 18 and also cover what was next in the programme. Could we
 19 perhaps just have a very short break now to just
 20 consider what the best plan of action is?
 21 SIR MARTIN MOORE-BICK: All right, well, I want to make it
 22 clear I am concerned about Mr Sounes' position.
 23 MS GRANGE: I understand that.
 24 SIR MARTIN MOORE-BICK: He has had a long day giving
 25 evidence and it takes its toll on anyone in his

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1 position.
 2 When you say a short break, do you mean
 3 five minutes?
 4 MS GRANGE: Yes.
 5 SIR MARTIN MOORE-BICK: All right.
 6 Mr Sounes, you have been following what we've been
 7 saying, but we are going to have a short break now to
 8 consider the implications of where we go, and you can do
 9 the same while you are out of the room, and then when
 10 you come back you can tell me how you see things and
 11 then we'll decide what we do. All right?
 12 So 4.45, please.
 13 (Pause)
 14 Right, 4.45.
 15 MS GRANGE: Thank you.
 16 (4.40 pm)
 17 (A short break)
 18 (4.48 pm)
 19 SIR MARTIN MOORE-BICK: Mr Sounes, first of all, my
 20 apologies, the five minutes turned into ten, as it so
 21 often does, but there we are.
 22 I'm going to ask Ms Grange if she has any idea how
 23 many more questions there might be, and then we will
 24 take it from there.
 25 Ms Grange, you have one question?

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1 MS GRANGE: Just one question.
 2 SIR MARTIN MOORE-BICK: Is that all that you have on the
 3 plate at the moment?
 4 MS GRANGE: That's correct.
 5 SIR MARTIN MOORE-BICK: As I explained to you earlier, the
 6 normal course now would be to break for about
 7 ten minutes to give other people a chance to feed
 8 questions in to Ms Grange, and then, depending on what
 9 comes in, we might be here for another 10 or 15 minutes
 10 dealing with them. I have no idea at the moment whether
 11 there will be many or few.
 12 As I said to you earlier, it's been a long day, and
 13 I'm sure you're tired. I'm also sure you want to finish
 14 your evidence, if you can, but I don't think it's fair
 15 to you to push you along unless you feel up to doing it.
 16 Do you understand that?
 17 THE WITNESS: I do.
 18 SIR MARTIN MOORE-BICK: All right. Now, how do you feel
 19 about it?
 20 THE WITNESS: I'm very happy to continue. I'm very happy --
 21 I would like to continue, rather than --
 22 SIR MARTIN MOORE-BICK: Even though you might be here for
 23 another 20 minutes or thereabouts?
 24 THE WITNESS: Yes.
 25 SIR MARTIN MOORE-BICK: Right.

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1 Now, Ms Grange, do you want to put your last
 2 question?
 3 MS GRANGE: Yes, that makes sense, that would be helpful.
 4 SIR MARTIN MOORE-BICK: Then we will break.
 5 Ms Grange has one final question.
 6 I'm sorry, before we go on, I should have asked the
 7 shorthand writer if she's happy to go on? Yes, all
 8 right.
 9 MS GRANGE: I'm grateful, thank you.
 10 It's about there being a firefighter lift. It's
 11 a very discrete question.
 12 If we can go to a document, this is {EX000001592/3}.
 13 So at the top of that page, we see an email from
 14 Cate Cooney to you on 9 August 2012. Do you see that
 15 there?
 16 A. Yes.
 17 Q. She is asking you a number of questions, and in the
 18 third question she says, "Is there a firefighting lift?"
 19 Do you see that there?
 20 A. Yes.
 21 Q. Then if we can go up the page, on 10 August 2012, page 2
 22 {EX000001592/2} of this, we can see there -- sorry, we
 23 should perhaps just see the top of the email first.
 24 Yes, it's a response back to her on 10 August 2012.
 25 If we can go down the page again, you can see there

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1 you have put "Fire fighting lift - no". Do you see that
 2 there?
 3 A. Yes.
 4 Q. It's really just to find out from you: can you recall
 5 why you told Cate Cooney that there was no firefighting
 6 lift in the tower? Can you recall on what basis you
 7 came upon that information and then gave it to her?
 8 A. I understood a firefighting lift was a firefighting
 9 shaft with its own lobby and stair.
 10 Q. Yes.
 11 A. So this was not it.
 12 Q. Yes. So you had worked that out yourself from looking
 13 at the design drawings of the tower?
 14 A. Yes. Although I believe it was referred to as
 15 a firefighting lift, but I'm not sure.
 16 Q. Yes.
 17 A. But it's not a firefighting shaft. Maybe I confused the
 18 two.
 19 MS GRANGE: Right, thank you.
 20 Mr Chairman, that was all I wanted to ask about
 21 that.
 22 SIR MARTIN MOORE-BICK: Thank you very much.
 23 We will take the break now, then, Mr Sounes, if you
 24 are confident that you are okay to carry on.
 25 THE WITNESS: Yes.

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1 SIR MARTIN MOORE-BICK: I'm going to say 5.05 and then we
 2 will put it all to bed then. Thank you very much.
 3 (Pause)
 4 Right, 5.05, then, please.
 5 MS GRANGE: Thank you.
 6 (4.52 pm)
 7 (A short break)
 8 (5.05 pm)
 9 SIR MARTIN MOORE-BICK: All right, Mr Sounes, this is the
 10 last lap.
 11 THE WITNESS: Yes.
 12 SIR MARTIN MOORE-BICK: Now, Ms Grange, do you have some
 13 more questions?
 14 MS GRANGE: Yes, just very few.
 15 Mr Sounes, can we just look, in the context of
 16 Building Control, at a document at {SEA00000154}, and
 17 I think this is an email that you sent to Paul Hanson of
 18 Building Control on 3 December 2013.
 19 A. Yes.
 20 Q. It's about the smoke control system.
 21 A. Yes.
 22 Q. You state in this email that that system is the single
 23 biggest risk to the proposals at that stage.
 24 A. This email?
 25 Q. That's the reference I have been given. I'm sorry, I'm

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1 having to respond to questions that are coming in at the
 2 very last minute. In an email to Paul Hanson you state
 3 that the smoke ventilation system is the single biggest
 4 risk to the proposals, and this is the reference I have
 5 been given.
 6 Can we look, are there any more emails further down
 7 from ... yes, there we go, thank you. So it's on page 2
 8 {SEA00000154/2}. In that second paragraph, we can see
 9 you say there:
 10 "We believe that agreement on the smoke ventilation
 11 to the tower is the single biggest risk to the
 12 proposals, but we don't think it is reasonable to leave
 13 the existing system in place."
 14 A. Yes.
 15 Q. Do you see that there?
 16 A. Yes.
 17 Q. Can you explain why you thought that was the single
 18 biggest risk to the proposals? Do you mean the
 19 Building Control proposals?
 20 A. No, it's the proposals that involve the dramatic
 21 alterations to the lower floors creating new
 22 accommodation.
 23 Q. Right.
 24 A. That, I would say -- if that was going to be assessed
 25 afresh against current guidance, that presented

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1 a potential risk to the overall scope of the work.
 2 Q. I see. So was cladding in your mind when you made that
 3 statement there?
 4 A. No.
 5 Q. No.
 6 A. No.
 7 Q. Is it right that, in the end, your understanding was
 8 that advice was sought from Building Control on the
 9 proposed smoke control system?
 10 A. Yes, I believe that went on for some time.
 11 Q. Then if I can look at another related email, this is
 12 {EX000000214}. It's an email to Max Fordham and Exova
 13 in which you state:
 14 "I think we need to formulate our argument for the
 15 smoke vent as soon as possible."
 16 In relation to Building Control comments.
 17 Do you recall saying that?
 18 A. Possibly, yes.
 19 Q. Do you recall what you were trying to argue in relation
 20 to the smoke control system?
 21 A. I believe I was following up the first meeting with
 22 Paul Hanson where he had asked for justification --
 23 Q. Right, yes.
 24 A. -- for the works to the smoke system to keep it -- his
 25 argument, as I recall, was you can't make anything

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1 worse, the non-worsening principle.
 2 Q. Yes.
 3 A. And he wanted something in writing or some kind of
 4 argument to demonstrate how what was there would be
 5 improved.
 6 Q. Yes, and was no worse.
 7 A. That it was no worse, and I was -- I think I was chasing
 8 Duncan, and I think Duncan particularly rather than
 9 Terry, for this input.
 10 Q. Yes. I have been asked to ask you about the use of the
 11 term there "argument", and to put to you that: shouldn't
 12 you have been taking their advice, rather than
 13 formulating arguments? It seems like quite a kind of
 14 adversarial process, put like that.
 15 A. No, I -- again, I think that's taking it out of context.
 16 What he was asking for was an analysis of what was there
 17 or what was designed and then provide a comparison to
 18 compare it -- to show ... I think we expected
 19 an improvement. That -- I had used the word "argument"
 20 to describe that comparison.
 21 Q. Okay. Yes.
 22 Then my final topic is about leaseholder
 23 consultation. Do you remember we had a look at that in
 24 the context of that engagement document?
 25 A. Yes.

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1 Q. Did you appreciate at the time that there are additional
 2 legal duties pursuant to the Landlord and Tenant Act
 3 1985 to consult with leaseholders on major works
 4 projects; was that something you were aware of at the
 5 time?
 6 A. Not the detail of any statutory requirements, but it
 7 makes sense.
 8 Q. Yes.
 9 Did anyone at TMO or RBKC ever make this clear to
 10 Studio E? Did you have that discussion with them?
 11 A. No.
 12 Q. Did you think it was the responsibility of Studio E to
 13 be engaging with leaseholders?
 14 A. No.
 15 MS GRANGE: No. Thank you.
 16 Mr Chairman, those are all of the questions.
 17 SIR MARTIN MOORE-BICK: Yes? Thank you very much.
 18 Well, Mr Sounes, those are all the questions.
 19 I must thank you very much for coming to give your
 20 evidence. I know it's been extended over rather a long
 21 time, and I'm sorry for that, and I'm sorry that we have
 22 kept you very late today, but at least you have
 23 finished, and we're grateful to you for coming to help
 24 us.
 25 Thank you very much, you're now free to go.

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1 THE WITNESS: Thank you.
 2 (The witness withdrew)
 3 SIR MARTIN MOORE-BICK: Good, and that's it for the day.
 4 MS GRANGE: It is.
 5 SIR MARTIN MOORE-BICK: 10 o'clock tomorrow.
 6 MS GRANGE: Yes, Mr Millett will be dealing with
 7 Mr Simon Lawrence tomorrow, the first of the Rydon
 8 witnesses.
 9 SIR MARTIN MOORE-BICK: Good, thank you very much.
 10 10 o'clock tomorrow, please.
 11 MS GRANGE: Thank you.
 12 (5.15 pm)
 13 (The hearing adjourned until 10 am
 14 on Thursday, 16 July 2020)

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