

OPUS 2

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Grenfell Tower Inquiry

Day 36

September 15, 2020

Opus 2 International - Official Court Reporters

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1 Tuesday, 15 September 2020
 2 (10.00 am)
 3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 4 today’s hearing. Today we’re going to continue hearing
 5 from Mr Anketell-Jones, so would you ask the witness to
 6 come back into the room, please.
 7 MR DANIEL ANKETELL-JONES (continued)
 8 SIR MARTIN MOORE-BICK: Good morning, Mr Anketell-Jones.
 9 THE WITNESS: Good morning, sir.
 10 SIR MARTIN MOORE-BICK: Are you ready to carry on?
 11 THE WITNESS: Yes.
 12 SIR MARTIN MOORE-BICK: Good, thank you very much.
 13 Ms Grange, yes.
 14 Questions from COUNSEL TO THE INQUIRY (continued)
 15 MS GRANGE: Yes, thank you.
 16 Good morning, Mr Anketell-Jones.
 17 First, what I want to do is just follow up on
 18 a number of the answers that you gave to my questions
 19 yesterday.
 20 You were asked about membership of the CWCT and
 21 whether you had attended a CWCT members’ meeting
 22 in October 2014. Do you remember that yesterday?
 23 A. Yes.
 24 Q. And you said {Day35/123:17}:
 25 “... I can’t remember what it was on or whether it

1

1 was CWCT or not.”
 2 That’s what you said yesterday.
 3 A. Yes.
 4 Q. Now, in fact what we can see from the documents, we
 5 think, is that you did attend a CWCT AGM and members’
 6 meeting on 7 October 2014 at which Mr Jonathan Roome of
 7 Celotex was also present. I want to just pull up
 8 a document, this is {CELO0001037}.
 9 Is it coming up on the screen?
 10 SIR MARTIN MOORE-BICK: We’ve got it on the screen.
 11 MS GRANGE: Ah, it’s not on my screen, sorry. My screen is
 12 blank.
 13 SIR MARTIN MOORE-BICK: Right. Perhaps we should get that
 14 sorted out.
 15 (Pause)
 16 Are you still blank?
 17 MS GRANGE: My screen is blank so I can’t see the document.
 18 SIR MARTIN MOORE-BICK: No, no, you can’t ask questions if
 19 you can’t see the document.
 20 MS GRANGE: It is a slight hindrance. My memory is good but
 21 not that good.
 22 SIR MARTIN MOORE-BICK: I’m sorry about this,
 23 Mr Anketell-Jones. We get these very occasional blips.
 24 (Pause)
 25 MS GRANGE: We’ve got it. Thank you.

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1 SIR MARTIN MOORE-BICK: Thank you very much indeed.
 2 MS GRANGE: Sorry about that, thank you.
 3 SIR MARTIN MOORE-BICK: I gather you’ve got it now?
 4 MS GRANGE: We’ve got it now, thank you.
 5 So we can see from this document that it says “CWCT
 6 AGM and Members’ Meeting” on Tuesday, 7 October 2014.
 7 Do you see that there at the top?
 8 A. Yes.
 9 Q. I just want to identify where you are first. Under the
 10 members list on the left-hand side, if we go down to the
 11 bottom of the page, we can see if you look at the
 12 seventh line up from the bottom, I think there is your
 13 name, “Daniel Anketell-Jones, Harley Curtain Wall Ltd”.
 14 Do you see that there?
 15 A. Yes.
 16 Q. You are also there with Mr Mark Stapley underneath, do
 17 you see that there, of Harley as well?
 18 A. Yes.
 19 Q. Staying with this bottom part of the page, can you see
 20 there on the right it says:
 21 “Non-member.
 22 “Jonathan Roome, Celotex Ltd.”
 23 Do you see that?
 24 A. Yes.
 25 Q. So we think this is the meeting at which you met a

3

1 member of Celotex, and that would appear to be Mr Roome.
 2 Does that sound right to you?
 3 A. Yes.
 4 Q. If we look back at the top of this document for the
 5 meeting, we can see that the speakers include, second
 6 person down on the left, Sarah Colwell of the BRE, do
 7 you see that there?
 8 A. Yes.
 9 Q. Now, her talk was entitled “Fire Testing Experiences”
 10 and appeared to go into considerable detail on fire
 11 testing for facades, including BS 8414 and BR 135. We
 12 have the slides for that talk and I want to show them to
 13 you.
 14 If we can bring up {CELO0001038}. If we could zoom
 15 in to start with on the top half of that page. So we
 16 can see there that top left slide, the talk was called
 17 “Fire Testing Experiences” at the CWCT technical
 18 meeting, and this seems to be dated 10 October 2014,
 19 Dr Sarah Colwell. Do you see that there?
 20 A. Yes.
 21 Q. Then underneath we can see the objectives of the talk:
 22 “Incidents.
 23 “Mechanisms of External Fire Spread.
 24 “Fire testing for Façades.
 25 “Interpreting data.

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1 "Summary and Questions."
 2 Now, looking at this now, can you remember seeing
 3 that presentation at that CWCT meeting?
 4 A. No, I can't remember seeing it.
 5 Q. This is not jogging any kind of memory in terms of being
 6 present?
 7 A. No, I think, because I was focused on structural design
 8 at that point, that's where the focus of my CPD and
 9 continued learning was focused. So without having the
 10 basis for a lot of these sorts of subjects, it probably
 11 didn't mean as much as the other things. So I can't
 12 remember seeing it.
 13 Q. Do you think you might have been present at the talk and
 14 just not concentrating on it because it wasn't your
 15 remit, or are you saying you weren't present at all?
 16 A. I can't remember. I think I might have been there and
 17 not concentrating because it wasn't what I was trained
 18 in and not part of my remit.
 19 Q. Just picking you up on that, as a structural engineer,
 20 wouldn't you have to have some knowledge of fire risks
 21 and of fire performance to perform your role as
 22 a structural engineer?
 23 A. Yes, of the structural components and what they were
 24 required to do in a fire. For the façade, it wasn't
 25 required to not melt, and that's basically where

5

1 a structural -- what a structural engineer will look at
 2 is if there are any fire requirements from that point of
 3 view. Because if there's -- you know, sometimes we
 4 design façades that are to stop fire from passing from
 5 one side of the façade to the other side, like
 6 a fire-rated curtain wall. In that instance, the
 7 bracketry and things that I would be designing would
 8 have to have a fire resistance, and you might have to
 9 specify a steel bracketry to make that work. But for
 10 a façade like the one that was on Grenfell, there aren't
 11 those requirements.
 12 Q. Wouldn't, as a structural engineer, you be interested in
 13 whether the façade materials might promote the spread of
 14 fire across the walls?
 15 A. So what I was doing was to make sure that it could stay
 16 on the building for the time that was required and
 17 resist the loads that was required. So you would be
 18 looking at how much the panels weighed.
 19 Q. I see.
 20 Can we just look on within this presentation.
 21 Section 2 is about, "What is a Façade?" If we just go
 22 further down this page, there's a list there about,
 23 "What is a façade?"
 24 Then the third topic appears to be "Examples of
 25 External Fire Spread". If we go to the next page of the

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1 presentation {CELO0001038/2}, we can see there's
 2 a number of "Fire Spread in Building Envelopes" examples
 3 that are provided: there's Knowsley Heights which is in
 4 Liverpool in 1991, Basingstoke in 1992, and then if we
 5 go one further down at the bottom of this page, we also
 6 then in the bottom left have Irvine, the Garnock Court
 7 fire which I asked you about yesterday. So that fire
 8 was referred to in this presentation.
 9 Again, they're striking images, aren't they, these
 10 pictures --
 11 A. Yes.
 12 Q. -- of façade fires? Can you explain why you don't
 13 remember those from this CWCT conference?
 14 A. I can't explain why I don't remember. Either I was
 15 sitting somewhere else or not sitting in the room,
 16 I don't know.
 17 Q. They're not bringing back any recollection for you of
 18 having --
 19 A. No.
 20 Q. -- attended this?
 21 Then if we look at the top of the next page, page 3
 22 {CELO0001038/3}, we can also see that there's reference
 23 to other cladding fires internationally. There's
 24 reference to a fire in Dijon, France in 2010, and then
 25 a whole list of recent high-rise external cladding

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1 fires, including towers in Dubai; the Mermoz, Roubaix in
 2 France in May 2012; other Dubai cladding fires;
 3 a Russian one; Istanbul, Turkey.
 4 Again, just in general terms, were you aware that
 5 there had been instances of cladding fires
 6 internationally at this time?
 7 A. I don't believe so, no.
 8 Q. You don't believe so?
 9 A. Well, I'm trying to cast my mind back, you know,
 10 seven years. I can't remember knowing about them at
 11 that point.
 12 Q. Can you remember when you did become aware of
 13 international cladding fires?
 14 A. Probably when I went to the MSc in Bath where they -- in
 15 the fire course, they covered a lot of these subjects
 16 there.
 17 Q. And when would that have been exactly? I know it was
 18 after you left Harley.
 19 A. I think middle of 2016.
 20 Q. Right, yes.
 21 Then if we look at the bottom of this page, we've
 22 got a section on "Mechanisms of fire spread", including
 23 "Vertical Fire Spread". In fact, these are some
 24 extracts from the diagrams you get in BR 135 about the
 25 mechanisms of fire spread externally.

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1 If you see on that bottom right-hand slide, there's
2 reference there to flames extending five to ten times
3 the original length, so flame elongation. Yesterday you
4 said you weren't aware of that phenomenon when you were
5 working on the Grenfell project.

6 Again, does this help as to whether or not you might
7 have known about that at this time, in 2014?

8 A. No. As I said yesterday, my knowledge at that time was
9 that you were always trying to stop unseen fire spread
10 so the Fire Brigade could focus on the fire, where it
11 was originating from.

12 Q. But the concept of flame elongation, you were positive
13 that's not something you were aware of; is that right?

14 A. No, it was just that the fire could spread behind the
15 panels and they wouldn't be able to see it.

16 Q. Yes.

17 Then topic 6, if we go to the next slide
18 {CEL00001038/4}, is about fire testing, and in
19 particular Sarah Colwell has focused on full-scale
20 system tests in this presentation, including 8414 tests.
21 We get a number of images which give a demonstration of
22 that type of testing. If we can look down again at the
23 next set of slides there, you can see there's reference
24 to the test duration, how long it runs for, what the
25 system is. Do you see that there?

1 A. Yes.

2 Q. Again, is this bringing back any memories in terms of
3 whether you were aware of these system tests? I think
4 yesterday you said you were barely aware that there was
5 an 8414 test?

6 A. Yes.

7 Q. Does this help as to whether or not you had more
8 knowledge than that in 2014?

9 A. I don't believe I did. As I said before, I was focusing
10 on the structural design, and on other projects that
11 I worked on, we'd always send this information off to
12 the fire consultant because I hadn't had any training in
13 that.

14 Q. Okay. We'll come back to the fire consultant later.

15 Just staying with this presentation, if we can keep
16 going down this slide, we get more information about the
17 BS 8414 test and the testing method {CEL00001038/5}.
18 There's a full-scale video clip of an external cladding
19 fire test that appears to have been shown as part of the
20 presentation. We see that in the bottom right-hand
21 corner. Then if we carry on, there's information about
22 what information is recorded as part of these tests, the
23 output from them {CEL00001038/6}. Then again if we can
24 keep going, we get a summary of the classifications of
25 performance, and there's reference there to BR 135 in

1 the bottom left-hand slide {CEL00001038/7}. Do you see
2 that there?

3 A. Yes.

4 Q. We see the front page of the publication. That was the
5 2013 third edition of BR 135 that's in that bottom
6 slide.

7 So, again, does this help as to whether you were
8 aware of BR 135 at this time in October 2014?

9 A. I was -- people mentioned it for, you know, saying that
10 certain things had passed the BR 135 test on other
11 projects, but because I wasn't trained in it, I'd always
12 send it off to people who were.

13 Q. Right.

14 Were you aware that BR 135 was relating to a system
15 test like this, a mock-up on a wall, as per these
16 photographs?

17 A. No, I don't think I was.

18 Q. And then if we look at the very bottom of that page 6
19 {CEL00001038/6}, there's reference to the failure
20 criteria -- sorry, we get the failure criteria actually
21 in that top right box, "External fire spread", "Internal
22 fire spread", it explains what the failure criteria are.

23 Then there's a discussion of mechanical performance
24 in the bottom left-hand slide, and it indicates that:
25 "Details of any system burn through, collapse,

1 spalling, delamination or flaming debris should be
2 included in the test report."

3 Do you see that sentence there?

4 A. Yes.

5 Q. Yesterday when I asked you, you said you weren't aware
6 of spalling and delamination as a feature of rainscreen
7 performance in fire. Does this help you as to whether
8 or not in fact you may have been aware of those
9 concepts?

10 A. The only concept I was aware of at that point was that
11 aluminium melted at quite a low temperature compared to
12 steel, and so in a fire, you know, there's a good chance
13 that the façade could melt and fall off.

14 Q. Yes.

15 Now, we've got some information about what
16 Mr Roome's take-away points were following this day and
17 the day generally, and I just want to look at an
18 internal Celotex email. This is {CEL00001255}. If we
19 can blow up the top half of that.

20 So this is not an email you would have seen at the
21 time. This was an email from Jonathan Roome to a large
22 number of his colleagues within Celotex dated
23 21 October 2014. He is reporting back and saying:

24 "Hi Team,

25 "As some of you may know I recently attended the

1 CWCT Members Meeting up in London.”
 2 Then he explains what the CWCT is.
 3 Then he explains what the reason for attending was
 4 in the next paragraph, and he says:
 5 “I met a number of people during the day and I have
 6 attached a list of attendees who you may want to
 7 follow-up.”
 8 So that was the list that we looked at at the
 9 beginning this morning.
 10 Then he says this in the next paragraph:
 11 “The day was a mix of opinion and fact (And a lot of
 12 the opinion was pretty one-sided -- The use of
 13 non-combustible materials ONLY!).”
 14 And he's put that in capitals .
 15 “A lot of people that I spoke to afterwards
 16 disagreed with a lot of what was said.”
 17 Do you see that there?
 18 A. Yes.
 19 Q. We can see one of his key take-away points that he's
 20 reporting back to colleagues on is that there should be
 21 non-combustible materials only in such façades. Do you
 22 see that?
 23 A. Yes.
 24 Q. Now, can you recall whether that was a point you came
 25 away with following that conference, that materials

13

1 should be non-combustible only?
 2 A. I can't remember anything in relation to that
 3 conference.
 4 Q. Do you remember any discussions about whether people
 5 agreed with whether non-combustible materials only
 6 should be used? Do you remember discussions during the
 7 conference about compliance?
 8 A. No, I can't.
 9 Q. Were you involved in any such discussions, for example
 10 with Mr Roome?
 11 A. No. I wouldn't have -- I can't remember being there, to
 12 be honest, but if I was, I wouldn't have had the
 13 knowledge to be able to, you know, cast any opinions on
 14 it.
 15 Q. After attending an event like this, what would you do,
 16 say, with the pack that you get at conferences, the
 17 slides? What was your practice in terms of reporting
 18 back to colleagues at Harley? Was that something you
 19 routinely did?
 20 A. Now when I go to them, the slides are usually sent out
 21 by email and I usually pass them on to my colleagues.
 22 Back then, I think, because I was not directly connected
 23 with them and more focused on structural design, I would
 24 leave that to Mark to send them out.
 25 Q. Did you ever check with him that he sent out that

14

1 material?
 2 A. I can't remember this conference, so no.
 3 Q. But would you agree, looking at it now, that that was
 4 pretty important material for cladding subcontractors,
 5 cladding designers, to be aware of?
 6 A. Yes.
 7 Q. If, as you say, your remit was so narrow and limited to
 8 structural considerations, can you explain why you were
 9 attending a CWCT event of this nature including such
 10 wide-ranging topics?
 11 A. No, I can't.
 12 Q. Now, just picking up on some other points about your
 13 role from yesterday, were you ever provided with
 14 a written job description while you were at Harley?
 15 A. I think probably when I very first started with the --
 16 in my first role, I would have -- there would have been
 17 a job description that I was applying for, but not to my
 18 knowledge after that.
 19 Q. So when you were promoted to the role of design manager,
 20 do you recall getting a revised job description --
 21 A. No.
 22 Q. -- setting out your role?
 23 A. When that happened, we had some more designers in the
 24 office, and Mark Stapley was my line manager. When
 25 there became more designers, we needed to have a way of

15

1 trying to keep a track on their programme and making
 2 sure that they were keeping to their programmes, so it
 3 was my responsibility to do that, but it was never any
 4 more formally discussed than that.
 5 Q. I see.
 6 Now, Mr Bailey's evidence was that Graham Hackley
 7 left Harley at the end of 2012 and beginning of 2013,
 8 and you said yesterday that you weren't made technical
 9 manager until the end of 2015, beginning of 2016.
 10 Can you help us as to who fulfilled the role of
 11 technical manager at Harley for the period between 2013
 12 and 2015?
 13 A. There wasn't one.
 14 Q. Who at Harley had responsibility during that period for
 15 ensuring that the designs of cladding systems complied
 16 with the Building Regulations?
 17 A. For the projects that I worked on, I would always pass
 18 it back to the client and the design team working under
 19 the client for them to confirm, so I'd send them the
 20 drawings to check. On the responsibility to make sure
 21 that that happened in the business as a whole I think
 22 would fall to the directors.
 23 Q. So on the Grenfell project, can you help us as to who
 24 that was? Who were you passing it back to? Who was the
 25 design team that you were asking to check for

16

1 compliance?
 2 A. I wasn't passing it back to anyone because I wasn't
 3 producing any of the design. For the structural design,
 4 I would pass it back to -- I can't remember who was in
 5 Rydon at the time, and ask that it was verified by their
 6 structural engineer.
 7 Q. So who was producing the designs for Grenfell and who
 8 was that being passed back to?
 9 A. So Kevin was producing the designs, and he would have
 10 been passing that back to Rydon and their design team.
 11 Q. I see.
 12 Now, I want to look at a passage from the transcript
 13 yesterday --
 14 SIR MARTIN MOORE-BICK: Sorry, just to interrupt you for
 15 a moment.
 16 When you say passing it back to Rydon and their
 17 design team, who did you understand to be Rydon's design
 18 team?
 19 A. I think at the time my involvement was so limited that
 20 it's only from looking back on it now, but I always
 21 understood that there was an architect, a fire
 22 consultant, Building Control, who would have been the
 23 client's design team.
 24 MS GRANGE: Why do you say Building Control was part of the
 25 design team? Was that Building Control's role?

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1 A. I think quite often Building Control inputs into design
 2 and checks design. They don't report to Rydon. You
 3 know, even in the past sort of three years
 4 Building Control are usually shown a lot of the design
 5 in the process for them to comment on and to confirm
 6 that it complies.
 7 Q. And that was your understanding at the time, was it,
 8 that Building Control were part of the design team?
 9 A. My understanding at the time would have been the same as
 10 all the projects that I had worked on, was that our
 11 client would be passing that information on to Building
 12 Control to check. But, yes, Building Control wouldn't
 13 be reporting to the client.
 14 Q. They wouldn't be reporting to the client --
 15 A. No.
 16 Q. -- did you just say? Okay.
 17 Just going to something else from the transcript
 18 yesterday, if we can pull this up, this was
 19 {Day35/202:10}. So I was asking you there:
 20 "Were you aware that that was part of Harley's
 21 responsibility to consider the need for effective fire
 22 barriers?"
 23 This is where I was asking you about the
 24 Curtins Consulting specification that had been included
 25 in Harley's subcontract. You say this:

18

1 "We would have known that we needed to put fire
 2 barriers in, we just wouldn't have known necessarily
 3 where they needed to go. We've relied on the fire
 4 consultant to tell us, as with other projects I had
 5 worked on."
 6 Now, I want to ask you: what steps did you or Harley
 7 have in place that you were aware of to ensure that you
 8 got full advice from the fire engineer on the Grenfell
 9 project?
 10 A. On the Grenfell project, I couldn't tell you. On other
 11 projects, I would always make sure that I had sent the
 12 firebreak elevations to them and that I'd always had
 13 confirmation back from the fire consultant that he was
 14 happy with what was shown.
 15 Q. And why couldn't you tell us whether that happened on
 16 the Grenfell project if you were the design manager for
 17 the project?
 18 A. Because I was just making sure that Kevin was keeping to
 19 programme, and occasionally he'd send me things that I'd
 20 pass through to Ray to check as well, but I think that
 21 was only at the very early stages. Later, once I was,
 22 you know, back focused -- well, just having to keep on
 23 with my workload on other projects, I think Kevin just
 24 went directly to Ray.
 25 Q. Kevin went directly to Rydon?

19

1 A. Ray, sorry.
 2 Q. Ray, I see.
 3 Was Kevin ever told, "You need to make sure you've
 4 got proper fire engineering input for your designs, this
 5 is who you go to"? Did you ever have that discussion
 6 with Kevin?
 7 A. No.
 8 Q. But you were line-managing him at the time; is that
 9 correct?
 10 A. I think that at the beginning I was for a couple of
 11 months, and then I was told to focus on other projects.
 12 So I had to keep up with the likes of the Trinity Square
 13 project, and once there was a project manager appointed,
 14 he would have been reporting to him.
 15 Q. I see.
 16 I'm going to come back a little bit later and just
 17 have a look at the extent to which you were inputting
 18 and supervising Kevin Lamb, so we'll park that for now.
 19 Just on the CDM Regulations now, what did you
 20 understand your duties under the Construction (Design
 21 and Management) Regulations to be during the Grenfell
 22 project?
 23 A. At that point I wouldn't have had any understanding.
 24 Q. Were you aware that, as a designer, you would owe duties
 25 to your client and duties when preparing or modifying

20

1 a design under the CDM Regulations?
 2 A. Not under the CDM Regulations. I would have realised
 3 that there was a duty to keep them informed and get
 4 things approved, but that was mainly to do with other
 5 projects .
 6 Q. Did you ever have an awareness on the Grenfell project
 7 that you would be categorised as a designer under the
 8 CDM Regulations?
 9 A. Not on the Grenfell project, no.
 10 Q. Were you ever involved in any design risk analysis or
 11 design risk assessments as part of a CDM process on the
 12 Grenfell project?
 13 A. Not on the Grenfell project, no.
 14 Q. At the time of the Grenfell project, did you have an
 15 understanding about the health and safety file under the
 16 CDM Regs and what was required in relation to that?
 17 A. Not on the Grenfell project, no.
 18 Q. Did you understand that Harley would have to make
 19 significant contributions to that health and safety file
 20 under the CDM Regulations?
 21 A. Not on the Grenfell project, no.
 22 Q. When you say, "Not on the Grenfell project", have you
 23 become aware at a later stage of your obligations under
 24 the CDM Regulations?
 25 A. Yes.

21

1 Q. Was that when the new regulations came in in 2015 or was
 2 that after that?
 3 A. No, that was in training that I've had after leaving
 4 Harley.
 5 Q. I see.
 6 Did you have any training with Harley about the
 7 CDM Regulations?
 8 A. No.
 9 Q. Now, the next topic I just want to explore is to
 10 consider briefly what involvement you and Harley had in
 11 the design process prior to being formally appointed on
 12 the project; yes?
 13 I want to turn, to start with, to a document
 14 {ART00001487}, and what this is -- just to be clear,
 15 you're not copied in here -- is an email from Mr Sounes
 16 of Studio E on 27 September 2013 to a number of
 17 individuals at the TMO, Max Fordham, et cetera, about
 18 the Grenfell project, reporting back on a meeting with
 19 Harley Curtain Wall this morning, do you see that in the
 20 first line? It says:
 21 "We met with Harley Curtain Wall this morning to
 22 discuss the project. They are very keen and have been
 23 tracking the project for some time. They are
 24 specialists in this type of project ... They pointed to
 25 Ferrier Point as ... being very similar to Grenfell ..."

22

1 Then Mr Sounes has recorded a number of key points
 2 arising from that meeting.
 3 Do you recall, were you present at any point during
 4 that meeting?
 5 A. No.
 6 Q. Now, it would appear that potential costings were
 7 discussed at that meeting, you can see from point 2, and
 8 indeed point 1.
 9 Do you remember ever being involved in discussions
 10 about costings prior to the appointment?
 11 A. No.
 12 Q. Can we now turn to a document later in time,
 13 November 2013, this is {HAR00006011}. Now, this is
 14 an email, if we blow it up, from Mark Harris on
 15 7 November 2013 to Tomas Rek at Studio E, but copying in
 16 Ray Bailey and Mike Albiston and others, Bruce Sounes,
 17 Mark Harris at Harley. You're not copied in here.
 18 In the bottom paragraph of that email, Mr Harris
 19 says this in the second sentence of that last main
 20 paragraph:
 21 "I have to say, from a Harley selfish point of view,
 22 our preference would be to use ACM. It's tried & tested
 23 (on many Harley projects), and we are confident in the
 24 cost base. That said, we are of course an envelope
 25 contractor, and would be happy to clad the build in the

23

1 material of choice."
 2 Do you see that there?
 3 A. Yes.
 4 Q. Did you at the time share that preference for ACM?
 5 Would that have been your preference as one of Harley's
 6 designers?
 7 A. I would always go with what had been specified by the
 8 architect. I didn't have any preference at all.
 9 Q. Did you know that your colleagues at Harley were
 10 expressing this preference at the time?
 11 A. No.
 12 Q. You weren't aware of that at all?
 13 Were you aware that Harley was closely involved in
 14 the selection of the Reynobond cladding panels?
 15 A. No. From my point of view, it was in the specification
 16 and it had been specified by the architect.
 17 Q. Can we turn now to an email again later in time. We're
 18 jumping forward to April 2014 now. This is
 19 {HAR00005711}. This is an email of 25 April 2014.
 20 So if we start, actually, with the email at the
 21 bottom of that page from Kai Fabiunke of Studio E to
 22 Mark Harris. Do you see that there?
 23 A. Yes.
 24 Q. In that email we can see what he's doing is attaching
 25 some initial drawings of how he would like the cladding

24

1 to look. So he says:
 2 "Hi Mark,
 3 "As discussed earlier, please find attached a couple
 4 of 3D images showing the detail we would like to achieve
 5 on the ACM rainscreen cladding panels."
 6 Then he goes into some detail about the column
 7 casings and the spandrel panels.
 8 And then if you look at the second- and third- last
 9 paragraph on page 1, he asks, three paragraphs up there
 10 from the bottom:
 11 "Could you please let us know if this could be done
 12 using the secret fixing system or if it has to be face
 13 fixed rivets. Would both fixing systems be within the
 14 budget?
 15 "If face fixed, what would the vertical centres of
 16 the T rails and horizontal centres of C channels need to
 17 be? If secret fixed, what would the vertical centres of
 18 the supports need to be?"
 19 Do you see that?
 20 A. Yes.
 21 Q. And then scrolling up to the top email, and this is
 22 an email that you are copied into, so this is back from
 23 Mark Harris to Mike Albiston, copying you in, so this is
 24 an internal Harley email, saying on 25 April 2014:
 25 "Mike - can you save to the file .

25

1 "Our Dan will be taking a look at these on Monday."
 2 Do you see that there?
 3 A. Yes.
 4 Q. Now, that's going to refer to you, isn't it, "Our Dan"
 5 there, because you're copied into the email; is that
 6 correct?
 7 A. Yes.
 8 Q. So at this stage, were you the person within Harley with
 9 the design knowledge to provide answers to the sorts of
 10 queries that we saw in that email?
 11 A. From a structural point of view, yes, and from
 12 a fabrication point of view.
 13 Q. I see. But, again, do we ever see you saying, "I'm only
 14 looking at this from a structural point of view"?
 15 Did you ever say that back internally to your colleagues
 16 within Harley?
 17 A. At that point in my career, it was the only training
 18 that I'd had. I had no other training in other areas
 19 that were -- that would make me be able to make any
 20 comment on it.
 21 Q. So you think it was implicit that you wouldn't have been
 22 able to advise any more broadly than that?
 23 A. Yes. You know, this would have been looking at how this
 24 would work structurally and whether it could actually be
 25 fabricated into those shapes that they were asking for.

26

1 Q. Did you give any consideration to whether ACM was
 2 a viable option that could be used instead of zinc for
 3 the cladding?
 4 A. As far as I was aware, it was only ACM. That is what --
 5 I've never thought any differently .
 6 Q. So you were never aware that zinc was being considered
 7 for this project?
 8 A. Not that I can remember, no.
 9 Q. Had you or Harley ever done any assessment to determine
 10 whether the ACM was a compliant material choice for
 11 Grenfell Tower?
 12 A. I wouldn't have been responsible for looking at that.
 13 Q. Who do you think might have been within Harley?
 14 A. At that point, I would have thought everyone would have
 15 assumed it had been done by the consultants, and it
 16 would have been done, you know, as part of the tendering
 17 process. I don't know, really .
 18 Q. At the point at which Harley became involved in the
 19 project and received the employer's requirements,
 20 including the NBS and drawings from Studio E, did you or
 21 anyone else at Harley take any steps to investigate the
 22 work that Studio E had done?
 23 A. No.
 24 Q. Did you simply adopt the work that Studio E had done and
 25 start detailed design or did you interrogate the work

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1 that Studio E had done in order to check it for
 2 compliance?
 3 A. We'd have adopted it, you know, on the basis that they
 4 had done all the checks beforehand.
 5 Q. Yes.
 6 Now, moving forward again in the chronology, this
 7 is May 2014, if we can go to {HAR00005786}. If you can
 8 blow up that top email. This is Mark Harris,
 9 29 May 2014, to Deborah French, copying in others, and
 10 you are copied into this email. Mark Harris says:
 11 "Hi Deb.
 12 "Will need your assistance when you get back from
 13 hols !!!
 14 "See attached."
 15 There's a mock-up draft in the attachments.
 16 Then they say:
 17 "We had a very positive meeting on site yesterday
 18 with the Rydon team and the architect. Rydon are coming
 19 to us on Monday 9th June to talk about the contract.
 20 Is it possible for you to provide a response ..."
 21 Do you see that there?
 22 A. Yes.
 23 Q. Were you present at that meeting on site? So if it was
 24 yesterday per the email, it would have been on
 25 28 May 2014 with Rydon and the architect. Do you recall

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1 whether you were present?
 2 A. At that point I was not ever involved in any estimating
 3 work-winning. It wasn't until 2016 that I started to
 4 make that move across. So, no, I don't believe I was.
 5 Q. You don't have any recollection of going to site
 6 in May 2014?
 7 A. No.
 8 Q. As we just noted, Mr Harris attaches a mock-up to that
 9 email. Were you ever provided with that mock-up?
 10 Sorry, you were; you're copied into it. Did you
 11 ever look at that mock-up? Sorry.
 12 A. No.
 13 Q. Now, if we go to {HAR00000978}. Again, moving forward
 14 in time, this is now 6 June 2014. So this is an email
 15 from Mark Harris, at the top of the page, to
 16 Mike Albiston, ccing you on 6 June 2014. We can see
 17 that what Mark Harris has done is forward an email from
 18 Simon Lawrence sent on that same day, which is below.
 19 Do you see that there?
 20 A. Yes.
 21 Q. And what Simon Lawrence has done in that email is to
 22 "clarify conversations between us all" and put some
 23 action points into that email.
 24 I want to look at the third bullet of this. He
 25 says:

29

1 "Bruce to send Harley [drawing] Autocad file of the
 2 Mock up draft so Harley design team can turn into
 3 working drawing. This is then to be approved by Bruce."
 4 Do you see that there?
 5 A. Yes.
 6 Q. Is Mr Harris forwarding you that email at the top
 7 because you were part of the Harley design team at this
 8 time?
 9 A. I was part of the Harley design team. I don't know why
 10 he's forwarding it though.
 11 Q. You were part of the design team but you don't know why
 12 he's forwarding it?
 13 A. No.
 14 Q. Why are you puzzled as to why he was forwarding that
 15 email if you were part of the design team?
 16 A. Sorry, the question was: was he forwarding it to you
 17 because he was part of the design --
 18 Q. Because you were part of the design team.
 19 A. I was part of the design team, but I don't know why he
 20 was sending it to the design team.
 21 Q. I don't understand. Why don't you know why he was
 22 sending it to the design team?
 23 A. "... so Harley design team can turn into working
 24 drawing."
 25 Okay.

30

1 Q. So:
 2 "Bruce to send Harley [drawing] Autocad file of the
 3 Mock up ... so Harley design team can turn into working
 4 drawing."
 5 So he's recording a number of actions, and this one
 6 is an action for Studio E to send the Harley autocad
 7 file of the mock-up to Harley.
 8 A. Yes.
 9 Q. Then if you look at the top of the page to the email,
 10 it's just forwarding it. Yes, if we can look at the top
 11 of this page, what's happened is Mark Harris has sent it
 12 to Mike Albiston and has cc-ed you.
 13 So my question is -- I think you've answered -- you
 14 were part of the Harley design team at this time, yes?
 15 A. Yes.
 16 Q. But just one more time, why did you not understand why
 17 this was being forwarded to you?
 18 A. I think I just was not reading it correctly.
 19 Q. Okay.
 20 Do you know whether the Harley design team
 21 considered the combination of the exterior components of
 22 the external façade at this point in terms of their
 23 compliance?
 24 A. I don't believe so, no.
 25 Q. And why would that have been? Why not?

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1 A. Because it wasn't a won job yet, I don't think. We were
 2 probably getting requests from Mark Harris to look at
 3 this or look at that. You know, look at the structural
 4 design, look at producing a mock-up. You know, we were
 5 just responding to his requirements.
 6 Q. I see.
 7 A. We weren't having an overall look at it yet.
 8 Q. Did the Harley design team consider fire performance and
 9 compliance with fire safety standards at this point?
 10 A. No.
 11 Q. Let's turn on, then, later in time to August 2014. If
 12 we can go to {SEA00011681}. This is an email dated
 13 27 August 2014 from Neil Crawford to Kevin Lamb and
 14 Simon Lawrence, and you're copied in, together with
 15 Bruce Sounes. Do you see that there at the top?
 16 A. Yes.
 17 Q. And although you're only copied in, can you see that
 18 it's addressed to Kevin and Daniel in that first line?
 19 A. Yes.
 20 Q. So it appears to be addressed to you; do you agree?
 21 A. Yes.
 22 Q. And we can see that he's proposing a call with the two
 23 of you. So:
 24 "Kevin/Daniel
 25 "Following my initial observations I have expanded

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1 the comments slightly and marked up the drawings
 2 attached as I think this will be easier to discuss over
 3 the phone with the comments in front.
 4 "Will call tomorrow morning to discuss as agreed.
 5 "Regards
 6 "Neil."
 7 We can see that the subject is "Grenfell Tower
 8 Preliminary cladding drawings for comment", and attached
 9 to that are "Preliminary Drawing Set Comments". Can you
 10 see that there?
 11 A. Yes.
 12 Q. Can you remember, did that call go ahead with
 13 Mr Crawford, following this email? He says he's going
 14 to call tomorrow morning to discuss. Do you remember
 15 that?
 16 A. No, I don't remember really speaking to Neil at all, so
 17 I don't know if he liaised directly with Kevin.
 18 Q. So you don't recall ever speaking to Mr Crawford during
 19 the Grenfell project?
 20 A. I don't recall, no.
 21 Q. Did you ever meet with him face to face?
 22 A. I think at the -- towards the end of 2014 I went to one
 23 or two design meetings. He may have been present there.
 24 Q. As the design manager, were you providing design input
 25 in order to progress the project at this stage? So this

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1 is 27 August 2014.
 2 A. No, I wasn't providing any design input; I was basically
 3 making sure that Kevin was keeping to programme and
 4 making sure that -- probably making sure that Ray was
 5 happy with what he was producing.
 6 Q. Did you ever have a discussion with Mr Crawford or
 7 anyone else at Studio E about whether Studio E
 8 considered it their responsibility to check the drawings
 9 of the façade for compliance with the
 10 Building Regulations?
 11 A. No.
 12 Q. Did Mr Crawford or anyone else at Studio E ever say to
 13 you, "We're only checking your drawings for
 14 architectural intent, ie we're not checking for
 15 compliance"?
 16 A. No.
 17 Q. Did you ever tell anyone at Studio E that you or anyone
 18 else at Harley, including Kevin Lamb, were taking
 19 responsibility for checking that the drawings were
 20 compliant?
 21 A. No.
 22 Q. And what was your understanding at the time of whose
 23 responsibility that was on the project?
 24 A. As with the other projects, I would have assumed that
 25 was the responsibility of the architect to make sure

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1 that the design was compliant and the Building Control
 2 to check that design to sign it off.
 3 Q. What about Rydon? Did you understand that Rydon were
 4 checking the designs that Harley produced?
 5 A. No, I didn't.
 6 Q. You didn't understand they were doing that?
 7 A. No.
 8 Q. So did you have a positive awareness that they were not
 9 checking them?
 10 A. I didn't have an awareness that they were or weren't.
 11 It just would have been normal for the architect to be
 12 checking them and Building Control to be signing them
 13 off.
 14 Q. Now, if we turn to paragraph 12 of your witness
 15 statement, this is {HAR00010149/3}, what you do in that
 16 paragraph is you explain what the different RIBA stages
 17 of work were. You're explaining it by reference to the
 18 new RIBA stages, which are numbered, as opposed to the
 19 old ones which were letters, A, B, C, D, if you
 20 remember. I just want to look at what you say at the
 21 very bottom of that paragraph in the last three lines,
 22 you say:
 23 "Therefore, the Harley Project Designer would have
 24 nothing to do with concept design, material selection,
 25 or positioning of the components."

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1 Do you see that there?
 2 A. Yes.
 3 Q. But would you accept, based on the exchanges I've just
 4 shown you, that this is not correct and that, in fact,
 5 on the Grenfell project, Harley did have a significant
 6 input into the concept design and material selection,
 7 including prior to its appointment?
 8 A. Can we go back to those documents?
 9 Q. Well, it's where I was showing you about Harley
 10 expressing a preference for ACM material, which was one
 11 of the alternatives in the NBS specification. Do you
 12 accept that Harley played a significant role in terms of
 13 the choice of that material?
 14 A. I think at the time I wasn't aware of that.
 15 Q. I see.
 16 A. So I couldn't say that they were having any effect on
 17 the concept design.
 18 Q. Can I ask you to look at Kevin Lamb's witness statement
 19 at paragraph 63. This is {HAR00010419/16}. If we can
 20 blow that up.
 21 So in this paragraph 63, he's explaining about how
 22 the infill panels, the window infill panels, came to be
 23 selected. Do you know what I mean by that, when we talk
 24 about infill panels? They were the white panels in
 25 between the windows or the panel which housed the

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1 extractor fan in the kitchens.
 2 A. Okay.
 3 Q. Do you recall that?
 4 A. Not really, but I understand your explanation.
 5 Q. Okay.
 6 He says this in the very end of that paragraph:
 7 "The use of the Kingspan TP10 for P2 was my decision
 8 as I have used this product over many years without
 9 issue."
 10 Now, the P2 panel was the one that housed the
 11 kitchen extract fan for the kitchen windows. You see
 12 him saying that there?
 13 A. Yes.
 14 Q. "The use of the Kingspan TP10 ... was my decision as
 15 I have used this product over many years without issue."
 16 Before I ask you any questions about that, I just
 17 want to show you another document.
 18 This is a copy of the Harley specification, if we go
 19 to {HAR00003866}. So this was the Harley specification
 20 notes for the external wall.
 21 What we can see is we've got some text, and then we
 22 can see someone has put some red annotations on it. Do
 23 you see that there?
 24 A. Yes.
 25 Q. And if we focus on the left-hand side, we can see that

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1 for the glazing P1 panels, they're the main window
 2 infill panels, the original author has put:
 3 "Core - 24mm Kingspan TP10 rigid insulation."
 4 Do you see that there?
 5 A. Yes.
 6 Q. Somebody has then annotated in red "25mm Styrofoam" next
 7 to that. Do you see that there?
 8 A. Yes.
 9 Q. Also, for the P2 panel, there's a comment "As above", do
 10 you see that there?
 11 A. Yes.
 12 Q. Are you aware that the red handwriting was
 13 Mark Stapley's handwriting?
 14 A. I wouldn't be able to say whose handwriting it was.
 15 Q. So our understanding is that Mr Stapley made these
 16 annotations in red for the styrofoam panel.
 17 Now, just looking at that, and assume I'm right on
 18 that and that this is Mr Stapley's writing, and bearing
 19 in mind Kevin Lamb's evidence that he specified the
 20 TP10, do you agree with me that some decisions as to
 21 what materials to use in the façade were being made by
 22 Harley during the project?
 23 A. If that is by Mark Stapley, then yes, I would agree with
 24 you.
 25 Q. And Kevin Lamb, the choice of the TP10 insulation

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1 originally? Do you agree that was Kevin's decision to
 2 use that product?
 3 A. I wouldn't know whose decision it was, but I would have
 4 thought all the materials should have been selected from
 5 the NBS specification.
 6 Q. But do you agree that that's an assumption that you're
 7 making, and that we actually need to look closely at the
 8 documents to tell us in fact who was selecting the
 9 materials?
 10 A. Yeah, the statement from Kevin is saying that some
 11 materials were being selected by members of Harley.
 12 Q. Well, by him?
 13 A. Yes.
 14 Q. And he was the project designer, wasn't he?
 15 A. Yes.
 16 Q. Now, I want to ask you some questions now about the
 17 appointment of Kevin Lamb. If we can go to paragraph 10
 18 of your statement first, this is {HAR00010149/2}. There
 19 you say this, you say:
 20 "In respect of the Grenfell project, I was
 21 temporarily made lead Harley contact for Rydon (the main
 22 contractor) at the end of July/beginning of August 2014,
 23 this was because no one else was available. Rydon was
 24 told I was the Project Designer; however, this was only
 25 intended to reassure them whilst a project team was

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1 pulled together. My primary role was to appoint an
 2 external designer as I did not have the capacity to take
 3 on the project. It was not unusual for Harley to bring
 4 in external designers to work on projects when there was
 5 not enough internal design resource and this happened on
 6 a number of projects."
 7 Do you see that there?
 8 A. Yes.
 9 Q. Now, just going back and looking again at that paragraph
 10 at the bottom of the previous page, I just want to ask
 11 you about the phrase you've used there:
 12 "... this was only intended to reassure them [ie
 13 Rydon] whilst a project team was pulled together."
 14 Can you explain exactly what you mean by that?
 15 A. I think they wanted to make sure that there was somebody
 16 in Harley who was available to work on the project.
 17 Q. Rydon did?
 18 A. Yes.
 19 Q. Yes. Do you remember who was it at Rydon who wanted to
 20 know that?
 21 A. No, I don't. This was -- Mark Harris was dealing with
 22 Rydon fully and just needed to put a name against the
 23 project.
 24 Q. And so far as you were aware, did it in fact have the
 25 effect of reassuring Rydon? Did Rydon appear to you to

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1 be comforted by the fact that you were being named as
 2 the project designer?
 3 A. I had very little to do with them at that point so
 4 I don't know.
 5 Q. Now, if we can then look at an email from Mr Harris
 6 dated 31 July 2014 to Simon Lawrence at Rydon, this is
 7 {HAR00005916}. So if we can blow up the top of that
 8 page. This is Mark Harris to Simon Lawrence, copying in
 9 a number of individuals at Harley and Rydon, and you are
 10 copied in here, we can see that. He says:
 11 "Hi Simon
 12 "Lead designer will be Dan Anketell-Jones, with
 13 brother Sam co-ordinating in the drawing office. We are
 14 yet to appoint a project manager, but Rob will advise on
 15 this in due course.
 16 "Now that we are officially under way, could
 17 I suggest that emails regarding the design phase are
 18 sent to Dan, but copied to rob and Sam.
 19 "I will deal with the commercial items with Zak."
 20 Do you see that there?
 21 A. Yes.
 22 Q. Do you agree that this told Rydon that you and Sam would
 23 be involved with the design of the façade?
 24 A. Yes.
 25 Q. And you would be the lead designer?

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1 A. Yes.
 2 Q. Was that your understanding at the time, that that would
 3 be your role?
 4 A. No, I was under the understanding that it was literally
 5 just a temporary stopgap, because I was far too busy on
 6 another project.
 7 Q. And was that because Harley didn't have adequate design
 8 resource at the time to cover the Grenfell project?
 9 A. Yes, which is why we bought in external resource.
 10 Q. Yes.
 11 Can you remember how long it was before you
 12 appointed Kevin Lamb? He said in his statement he was
 13 appointed in July/August 2014 -- that's at paragraph 11
 14 of his statement {HAR00010419/2}. Can you help as to
 15 when he came on board?
 16 A. I think it was almost straight away, because I didn't
 17 have the time to look at it or work on the project. So
 18 he had to be brought in, you know, immediately.
 19 Q. So was there a project designer before Kevin Lamb was
 20 appointed?
 21 A. I don't believe anyone did any actual design work before
 22 Kevin started.
 23 Q. Right.
 24 Now, if we go to another email a little bit earlier
 25 than this, just to see the back story to this, this is

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1 {HAR00006153}. This is an email chain from
 2 19 June 2014, but I want to start with the email at the
 3 bottom of page 1. So we pick that up at the bottom,
 4 Thursday, 19 June, Mark Harris to Rob Maxwell, copying
 5 in Ray Bailey.
 6 Then if we go over the page to the top of page 2
 7 {HAR00006153/2}, we can see that he is saying:
 8 "Rob
 9 "To keep you in the loop, contract stuff is start to
 10 hit us now on the Grenfell Tower front.
 11 "Some of the items below and attached are for
 12 estimating ..."
 13 Do you see that there in the first paragraph?
 14 A. Yes.
 15 Q. Then he says:
 16 "... however, there are many items which need
 17 looking at by our proposed Grenfell House construction
 18 team, and therein lies the problem, we don't [bleep]
 19 have one!!"
 20 Do you see that there?
 21 A. Yes.
 22 Q. So he's saying he doesn't have a proposed Grenfell House
 23 construction team.
 24 Then he says in the next sentence:
 25 "To say I'm concerned about this is an under

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1 statement."
 2 Do you see that there?
 3 A. Yes.
 4 Q. Then the substantive paragraph just before the bottom:
 5 "The last thing I want to do is walk away from the
 6 job ... not least because it would severely damage our
 7 relationship with Rydon, and worst still, would
 8 potentially leave the door open for Tim Lovell & Co.
 9 However, unless we can gear up and service it, [we] are
 10 doomed to fail."
 11 Do you see that there?
 12 A. Yes.
 13 Q. Were you made aware of Mark Harris' concerns at the
 14 time? You're not copied into this email, but were you
 15 aware how concerned he was about resourcing the Grenfell
 16 project?
 17 A. I don't think so.
 18 Q. You don't think so?
 19 Just describe the office at Harley. Is it
 20 an open-plan office or is it -- were you separated out?
 21 A. At that point it was -- there was sort of like two
 22 offices, so it was all on one floor but there was sort
 23 of a corridor down the middle, and mainly the design
 24 team were in the -- in one office and everyone else was
 25 in another office, and then Ray had his own office.

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1 Q. I see. So you wouldn't necessarily be aware of what
2 some of the commercial team were saying?
3 A. No.
4 Q. Then if we look at Mr Maxwell's reply at the top of
5 page 1 {HAR00006153/1} of this string, we can see that
6 he says:
7 "Mark [to Mark Harris, copying in Ray Bailey],
8 "We need to get an external design team on this
9 now."
10 Do you see that there?
11 A. Yes.
12 Q. "I can pull in a project/site manager within a couple of
13 weeks, we could use Neal or Ben to attend a meeting ..."
14 So he's talking there about an external design team.
15 Is this concern regarding resources what prompted you
16 eventually to approach Kevin Lamb as the designer?
17 A. I don't know if it was in response to this. I just was
18 told that we needed to get somebody in to design
19 Grenfell. I imagine that the senior management decided
20 that it was better to get in someone external on
21 a contract rather than employ someone new.
22 Q. Yes.
23 A. So I was just asked whether I knew anybody. We'd had
24 a lot of problems with external design before, but
25 Harley had worked with Kevin, I'd worked for Kevin; we

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1 were both confident that he could produce the work
2 required.
3 Q. Is it right that the only external person engaged by
4 Harley subsequently to service the Grenfell Tower
5 project was Mr Lamb?
6 A. Yes.
7 Q. Now, based on the references in this email string, we
8 saw in the string below this that there was reference to
9 needing a "construction team", and in this email he
10 talks about the need to get an "external design team".
11 Would you agree that the implication in these emails
12 is that a team of people, ie more than one person, would
13 be engaged, and that a single additional recruit
14 wouldn't be sufficient to deal with Harley's capacity
15 problems?
16 A. Usually one designer can do the detailing work and
17 another designer can do the fabrication work with --
18 depending on the programme, you can make it work with
19 one. I think we decided that, you know, just with
20 Kevin, he could keep to the programme requirements.
21 Q. Does that mean that if resources hadn't been an issue,
22 you would have expected to have had two designers from
23 Harley working on the Grenfell project?
24 A. No, I think it was more to do with the programme.
25 I think that if you had enough time, one person could

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1 cope with the workload.
2 Q. Were you satisfied at the time you appointed Kevin Lamb
3 that it was sufficient to just have one designer on the
4 project?
5 A. Yes.
6 Q. Even though you've just said, "Usually one designer can
7 do the detailing work and another designer can do the
8 fabrication work", you were satisfied that Mr Lamb could
9 do all of that?
10 A. I can't remember but it's -- the only reason you have
11 somebody doing design and someone else doing the
12 fabrication is because you're really pushed for time on
13 a programme. It would appear to me, looking back, that
14 we must have thought that one person could meet the
15 programme requirements.
16 Q. Yes.
17 Did you think that this issue of design resource was
18 being raised quite late in the project?
19 A. I think that it's quite normal to not know until the
20 very last minute whether you're going to get an order or
21 not, and you're never given any warning, you know, that
22 an order is necessarily going to be coming, or at least
23 I wasn't, so that you would literally have to find
24 resource when an order came in.
25 Q. Yes. Okay.

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1 So sticking with the theme of Kevin Lamb's
2 appointment and looking at paragraph 11 of your witness
3 statement, if we can bring that up, {HAR00010149/3}, you
4 say there:
5 "I was involved in the appointment of the Project
6 Designer for the Grenfell project, Kevin Lamb. I had
7 worked for him previously in his company Bespoke Design
8 Services. I contacted him about the job. He was
9 interviewed by others and contracted to work for Harley
10 as the Project Designer in around July or August 2014."
11 Do you see that there?
12 A. Yes.
13 Q. You've explained already that Kevin had previously
14 worked on projects for Harley; that's correct, isn't it?
15 A. Yes.
16 Q. What was the nature of any projects he had been involved
17 in and, in particular, had he done any residential
18 high-rise projects for Harley before?
19 A. My understanding was that he'd helped with the
20 Chalcots Estate project early on with Harley.
21 Q. Helped in what way? Can you be more specific?
22 A. He'd helped with the design at the early stages.
23 Q. I see.
24 Can you recall what process you went through to
25 ensure that Kevin Lamb was a suitable designer to take

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1 on the Grenfell project?
 2 A. For myself, he was more competent than I was. He'd been
 3 working in the industry for a lot longer than I was, and
 4 then also he was known by the company. So he was -- he
 5 understood how to do detailing and he understood how to
 6 do fabrication .

7 Q. I see.

8 Now, you say there as well that he was interviewed
 9 by others. Can we just look at Mr Lamb's statement.
 10 This is {HAR00010419/3}, paragraph 13. He says there
 11 that he attended a meeting with Ray Bailey, the director
 12 of Harley, and you on 12 August 2014, and that in
 13 advance he was sent some details about Grenfell .

14 He goes on and explains at the end of paragraph 14
 15 that they discussed attendance at a design team meeting
 16 on site at Grenfell the next day.

17 So it appears there was a meeting with him to
 18 discuss the project and then he was there the next day
 19 on the project .

20 Is it possible that you were mistaken in your
 21 statement about whether you actually interviewed him?
 22 Do you recall now interviewing him on 12 August 2014?

23 A. I would have contacted him before by phone. We would
 24 have -- we'd sort of loosely kept in contact since I'd
 25 left working for him, so I would have probably called

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1 him about the job and discussed it, what was involved,
 2 what the programme was, and then would have wanted him
 3 to come in and meet Ray. I would have seen that as --
 4 rather than being -- I knew him, I didn't have
 5 a requirement to interview him, so I saw the interview
 6 as being by Ray.

7 Q. I see. Did it feel like an interview that Ray did with
 8 him?

9 A. I can't remember this meeting, to be honest.

10 Q. Do you remember whether any information was sought,
 11 either by you on the telephone in advance of the meeting
 12 or at this meeting, about any relevant qualifications
 13 that Mr Lamb held?

14 A. No, I don't.

15 Q. You don't have a recollection of that?

16 A. No.

17 Q. Do you think it's likely that someone would have asked
 18 about his qualifications, knowing Harley --

19 A. For myself, I always understood that he had a degree in
 20 civil engineering and that he'd worked in the industry
 21 for a long time. He'd worked for some of the large
 22 façade companies -- or façade supplier companies, and
 23 he'd had his own business for a long time.

24 Q. Right.

25 Did you ever discuss with him whether he would be

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1 comfortable working on a large-scale façade project
 2 without direct supervision?

3 A. No.

4 Q. Did you take into account that Harley would have
 5 responsibility for the detailed design of the façade,
 6 and therefore it was of importance that Kevin Lamb had
 7 the knowledge and experience to undertake this task?

8 A. The parts that I was -- believed that we were ultimately
 9 responsible for, I believed that he was capable of
 10 providing.

11 Q. Did you think that the task he would be engaged in would
 12 require a knowledge of the Building Regulations and
 13 associated guidance?

14 A. No, because I thought that that would be covered by the
 15 architect and checked off by Building Control.

16 Q. So does it follow that you didn't assess his capability
 17 in terms of understanding of the Building Regulations
 18 and associated guidance around external façades?

19 A. No, because that would be put back to the people who did
 20 have that training.

21 Q. Now, if we can just look at Mr Lamb's quotation and
 22 scope of works, this is at {HAR00010415}. So this was
 23 the quotation that Mr Lamb came up with to Harley. It's
 24 for the attention of you, we see that on the left-hand
 25 side underneath the address of Harley, and it's dated

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1 12 August.

2 He says:

3 "Dan,

4 "Further to your email 07.08.14 and our meeting this
 5 morning, please find below our quotation for design
 6 services to the aforementioned project."

7 Do you see that there?

8 A. Yes.

9 Q. Then if we can look at page 6 {HAR00010415/6} and the
 10 terms and conditions that were proposed, under
 11 "Liabilities", we can see point IV, the last point under
 12 "Liabilities", it says:

13 "All information as supplied by Bespoke Design in
 14 good faith, should be checked for errors and general
 15 conformity."

16 Do you see that there?

17 A. Yes.

18 Q. Can you help us as to what quality control procedures
 19 Harley had in place to ensure that Kevin Lamb's designs
 20 were checked for errors and general conformity?

21 A. I think, from Harley's point of view, he was working as
 22 a Harley designer, so the company would have been
 23 working on the pretence that he was responsible for it
 24 and wouldn't have done that.

25 Q. Does that mean there weren't any quality control

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1 processes in place to check Kevin Lamb's design work?
 2 A. No.
 3 Q. No, there weren't?
 4 A. No, there weren't.
 5 Q. Now, if we can look at another email around this time,
 6 {SEA00011528}, this is an email of 15 August 2014. So
 7 if we can blow this up.
 8 Sorry, actually, the one I want is at the bottom of
 9 page 1 and over from page 2. It's from you to
 10 Mr Lawrence on 15 August 2014 at 16.04. Do you see it
 11 beginning at the very bottom of that page?
 12 A. Yes.
 13 Q. Then if we can go over to the top of page 2
 14 {SEA00011528/2}, it's ccing in Kevin Lamb and Rob
 15 Maxwell:
 16 "Good Afternoon Simon,
 17 "Following on from the meeting on Wednesday; I would
 18 just like to confirm that Kevin will be the main
 19 designer working on Grenfell Tower."
 20 Do you see that there?
 21 A. Yes.
 22 Q. Then you say:
 23 "We are keen to get on with the design as quickly as
 24 possible, and therefore will proceed with champagne
 25 cassettes as discussed.

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1 "We are going to focus on the details around the
 2 windows, which will allow us to finalise the extrusion
 3 design as quickly as possible.
 4 "If you could send over the drawings submitted for
 5 planning this would be a great help. We want to be
 6 sure, all the right specs are on the drawings to start
 7 with, and get as much signed off and agreed as we can."
 8 And then you've signed off on that. Do you see that
 9 there?
 10 A. Yes.
 11 Q. Do you agree that you haven't stated in this email that
 12 you would be leaving the project or only involved from
 13 time to time?
 14 A. No, I think by stating that Kevin was going to be the
 15 main designer, it would have been clear.
 16 Q. But the way the email is worded, you then say:
 17 "We are keen to get on with the design as quickly as
 18 possible ...
 19 "We are going to focus on the details around the
 20 windows ..."
 21 Wouldn't that have conveyed or weren't you looking
 22 to convey that there was a design team and you were part
 23 of that design team at this time?
 24 A. I think it was just trying to speak as Harley, not as
 25 a design team.

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1 Q. Did you intend to give the impression that you would
 2 remain fully involved with the project?
 3 A. No.
 4 Q. Did you ever explain to Rydon that you would only have
 5 minimal involvement in the project going forward?
 6 A. No.
 7 Q. Right. Why was that not explained?
 8 A. It was explained to me at the beginning by Mark that it
 9 was just a stopgap, and I think that I thought that he
 10 would have told that to the client as well.
 11 Q. I see. So you're saying you assumed that Rydon was told
 12 that your involvement would diminish; is that right?
 13 A. Yes. I didn't see it as my place to tell them that. It
 14 would have been up to either Ray or the project manager.
 15 Q. Did you consider that you would be able to carry out
 16 your supervisory responsibilities for Kevin Lamb given
 17 that you've said in your statement you would often be
 18 dipping in and out of the Grenfell project?
 19 A. Yes, because my responsibilities were to make sure he
 20 was sticking to programme, and if he wasn't, to try and
 21 get some help for him.
 22 Q. Was it ever explained to you that your supervisory
 23 responsibility for Kevin Lamb was limited to just the
 24 programme?
 25 A. It was what I did with all of the designers, was limited

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1 to that. There were designers who were more experienced
 2 than me. It was never stated that I needed to be
 3 checking any more than their programme requirements and
 4 that the resource was covered.
 5 Q. Did you ever become concerned on the project that
 6 Mr Lamb might be undertaking design work without
 7 adequate supervision?
 8 A. No.
 9 Q. Did you consider that you had adequate and sufficient
 10 time to properly supervise the design work on the
 11 Grenfell project?
 12 A. I wasn't supervising the design work.
 13 Q. So nobody was supervising Kevin Lamb?
 14 A. He would have been reporting to the project manager. He
 15 would have been in contact with the managing director
 16 and the contracts manager.
 17 Q. But was anyone actually supervising the design work he
 18 was doing as the project designer?
 19 A. He was liaising with the managing director, so I think
 20 he would have been seeing his design from that point of
 21 view.
 22 Q. Are you saying Ray Bailey looked over his designs?
 23 A. Yes.
 24 MS GRANGE: Mr Chairman, I think that's an appropriate
 25 moment for a break.

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1 SIR MARTIN MOORE-BICK: Is that convenient?
 2 MS GRANGE: Yes, it is.
 3 SIR MARTIN MOORE-BICK: Yes, all right.
 4 Well, we'll have a short break now,
 5 Mr Anketell-Jones. We'll come back at 11.35, and please
 6 remember not to talk to anyone about your evidence or
 7 anything to do with it while you're out of the room, all
 8 right?
 9 THE WITNESS: Yes, sir.
 10 SIR MARTIN MOORE-BICK: Thank you. If you would like to go
 11 with the usher, please.
 12 (Pause)
 13 Right, 11.35, please.
 14 (11.20 am)
 15 (A short break)
 16 (11.36 am)
 17 SIR MARTIN MOORE-BICK: Right, Mr Anketell-Jones, all ready
 18 to carry on?
 19 THE WITNESS: Yes.
 20 SIR MARTIN MOORE-BICK: Thank you very much.
 21 Yes, Ms Grange.
 22 MS GRANGE: Thank you.
 23 I'm going to ask you some questions now about the
 24 NBS specification on the project, and then I'm going to
 25 turn to the topic of insulation, which will probably

1 take the rest of this morning, just in terms of where
 2 we're going.
 3 So on the NBS specification, can we turn that up.
 4 This is at {SEA00000169}. This is the NBS specification
 5 for the Grenfell project which formed part of the
 6 employer's requirements in Rydon's main project. Do you
 7 see that there?
 8 A. Yes.
 9 Q. Is that a document you're familiar with?
 10 A. I'm familiar with it now; at the time I think I was only
 11 familiar with it in very brief sort of passing.
 12 Q. I see.
 13 Let's look at page 63 {SEA00000169/63} in this
 14 document. This is section H92, which begins the
 15 rainscreen cladding section. Do you see that there?
 16 A. Yes.
 17 Q. If we go on to page 64 {SEA00000169/64}, we can see the
 18 introductory parts of that H92 section.
 19 Now, is this a section that you would have read in
 20 your capacity as design manager on the Grenfell project?
 21 A. Because I was only looking to manage Kevin's time and
 22 make sure he was keeping to programme, I would have only
 23 probably looked at this very briefly.
 24 Q. Would you not have been interested to see what products
 25 had been specified, what standards had been specified in

1 here by the architect?
 2 A. Because I had my own other project that I was working
 3 on, it would have been only a very brief look at it.
 4 Q. Now, we can see in that top section which begins, "To be
 5 read with preliminaries/general conditions", the second
 6 bullet down says:
 7 "The manufacturers noted within this specification
 8 are indicative and may be substituted with similar or
 9 equal alternatives."
 10 Do you see that there?
 11 A. Yes.
 12 Q. Were you aware in general terms of that on the Grenfell
 13 project, that the NBS had said, certainly for the
 14 cladding, that the specification was indicative and that
 15 there could be substitution with similar or equal
 16 alternatives?
 17 A. I think I wasn't aware of this on this one. The only
 18 times that I would have been aware of this is if, on
 19 another project, that it was a performance specification
 20 rather than a prescriptive one.
 21 Q. Sorry, the only times you would have been aware of this
 22 would be on another project that it was a performance
 23 specification rather than a prescriptive one; that's
 24 what you just said, yes?
 25 A. Yes.

1 Q. So what type of specification did you think the Grenfell
 2 project was?
 3 A. A prescriptive one.
 4 Q. Can we look at the bottom of this page, section 11 there
 5 it says:
 6 "Information to be provided with tender.
 7 "In addition to the cladding specified in the below
 8 clauses 120 & 123 submit comparative supply and install
 9 costs per m2 of the whole cladding system for the
 10 following alternative materials ..."
 11 And we have Reynobond Duragloss, and some finishes
 12 given there; Alucobond, Spectra; Zinc, Quartz Zinc,
 13 panels by VM zinc. Do you see that there?
 14 A. Yes.
 15 Q. Were you aware that the NBS specification had a main
 16 zinc panel specified but then had put in these
 17 alternatives?
 18 A. No, I wasn't.
 19 Q. You weren't aware of that?
 20 A. No.
 21 Q. Do we go back to your answer that you gave previously,
 22 that the only product you were aware of for the cladding
 23 was the Reynobond; is that correct?
 24 A. Yes.
 25 Q. Would you agree, looking at that, that whilst it may be

1 prescriptive in the sense that you've got some products
 2 specified there and you've got to do similar or equal
 3 alternatives, it's not wholly prescriptive, is it? It's
 4 not saying: you must use this one product.
 5 A. Because this is at the beginning, I would have thought
 6 there was another section later on that said what the
 7 product should be, but as this was to be provided with
 8 the tender, I would have thought that this had all been
 9 done during the estimating stage.
 10 Q. I see.
 11 Did you analyse the design that was provided for in
 12 the NBS specification and in Studio E's drawings that
 13 were provided as employer's requirements for compliance
 14 with relevant regulatory requirements, including the
 15 Building Regulations and associated guidance?
 16 A. No, because I was only responsible for looking after
 17 Kevin's time and making sure he was keeping to
 18 programme.
 19 Q. Were you aware whether Kevin Lamb did this as the main
 20 project designer?
 21 A. No, I wasn't.
 22 Q. Would you have expected Kevin Lamb to have done that?
 23 A. I would have expected him to be familiar with everything
 24 in here, but I would have expected the compliance of the
 25 product with the Building Regulations to have been done

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1 by Rydon's design team and Building Control.
 2 Q. So is it right that you didn't expect that anybody
 3 within Harley would have gone through the process of
 4 checking the NBS specification and Studio E's drawings
 5 for compliance with the relevant regulatory
 6 requirements?
 7 A. On other projects I was working on, it would always be
 8 that those checks had been done by the architect and
 9 that Building Control had signed it off, and on those
 10 projects I would check that that had been done.
 11 Q. But on the Grenfell project, is it right that you
 12 weren't expecting that anybody within Harley would have
 13 gone through the process of checking the
 14 NBS specification and the drawings for compliance?
 15 A. No.
 16 Q. Can we just look at Mr Bailey's evidence from last week.
 17 If we can pull up the transcript, this is
 18 {Day32/51:4-13}.
 19 So I want to pick it up at the fourth line. So this
 20 is Mr Millett saying to Mr Ray Bailey:
 21 "Question: Just take the NBS specification, okay:
 22 did anybody at Harley analyse the materials and products
 23 contained in the NBS specification so far as concerned
 24 the cladding to check whether it complied with the
 25 relevant statutory requirements?"

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1 "Answer: Yes.
 2 "Question: They did?
 3 "Answer: Yes.
 4 "Question: Who was that?
 5 "Answer: It would have been Daniel."
 6 Do you see that there?
 7 A. Yes.
 8 Q. Now, can you explain why Mr Bailey was saying that it
 9 was your job to check, and that he understood you had
 10 checked, the NBS specification for compliance?
 11 A. I think that the timeline -- timeframes might be
 12 confused, because at this point I wasn't educated in
 13 anything to do with these things, so I wouldn't have
 14 been able to check. I think he might be confusing that
 15 maybe it was after I'd attended more of the MSc and had
 16 studied some of these things.
 17 Q. I see. So you think he's mistaken?
 18 A. Yes.
 19 Q. And you're clear, are you, that you never analysed the
 20 NBS specification for compliance?
 21 A. Yes.
 22 Q. And you weren't aware of Kevin Lamb ever doing that?
 23 A. No, I wasn't aware of him ever doing that, no.
 24 Q. Can we look at another passage from Mr Bailey's
 25 evidence. Stay with Day 32, if we go up to pages 25 and

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1 26, and I just want to pick it up at maybe line 11 on
 2 page 25 {Day32/25:11}:
 3 "Question: How many of those employees would have
 4 been required, as part of their job, to consider the
 5 fire performance of specified materials in relation to
 6 any particular project?
 7 "Answer: I -- in terms of ... what the design
 8 office generally do is if the products have
 9 a certificate that says they're class 0, they rely on
 10 that, so it's -- anybody working at the design office
 11 will look at -- once the certificate's been looked at,
 12 and the product is accepted, they will use it. We don't
 13 look at every product every time. Once it's been used
 14 and been signed off, we will use it on another project
 15 without --
 16 "Question: Right.
 17 "You refer to a design office. Who was the design
 18 office, or who comprised the design office, as at 2013
 19 to 2014?
 20 "Answer: 2013/14, it was -- Dan was in the design
 21 office, Mark Stapley was in the design office, and there
 22 were another four designers in our in-house design
 23 office at that stage."
 24 Do you see that answer?
 25 A. Yes.

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1 Q. So that line of questioning began with the question:
 2 "How many of those employees would have been
 3 required, as part of their job, to consider the fire
 4 performance of specified materials in relation to any
 5 particular project?"
 6 And it ends up with it being said that you and
 7 Mark Stapley, as part of the design office, would have
 8 been required to consider that.
 9 Do you agree that that was part of your remit in the
 10 Harley design office at this time, to consider the fire
 11 performance of specified materials in relation to any
 12 particular project?
 13 A. So on the projects that I would be working on, I would
 14 always send off the technical information for the
 15 materials to get it approved by that particular
 16 project's design team and Building Control. So you
 17 would consider it from that point of view, but you
 18 weren't educated to be able to assess it yourself.
 19 Q. I see. Did you do that on the Grenfell project?
 20 A. No, because I wasn't the main designer. I did that on
 21 the projects that I was the main designer on.
 22 Q. So who would you have expected within Harley for the
 23 Grenfell project would have considered the fire
 24 performance in the limited way you've just explained?
 25 A. I would have expected it to have been the designer to

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1 have checked that the products that were going on to the
 2 building had been checked by the architect and
 3 Building Control.
 4 Q. And the designer there, are you referring to Kevin Lamb?
 5 A. Yes.
 6 Q. Do you ever recall having a conversation with Mr Lamb
 7 that it was part of his job to be checking that the
 8 products were compliant by making sure the architect and
 9 Building Control had checked that?
 10 A. No.
 11 Q. How would Mr Lamb know that that was part of his job?
 12 A. From working with him previously and having done that
 13 with him previously, I would have expected him to have
 14 known that.
 15 Q. Okay.
 16 Now, if we can go back to the NBS specification, if
 17 we look on page 68 at item 220 {SEA00000169/68}. If we
 18 look there, this is still within the H92 rainscreen
 19 cladding section, and this item 220 is headed
 20 "Specification" and it says:
 21 "Compliance standards: The Centre for Window and
 22 Cladding Technology (CWCT) ..."
 23 It then says in the second bullet:
 24 "Reference information: For the duration of the
 25 contract, keep available at the design office, workshop

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1 and on site copies of:
 2 "The Centre for Window and Cladding Technology
 3 (CWCT) 'Standard for systemised building envelopes'"
 4 Do you see that there?
 5 A. Yes.
 6 Q. That standard is actually referred to in several places
 7 within this NBS specification. It's also referred later
 8 in clause 310.
 9 Can I ask you to turn that up now. It's
 10 {CWCT0000046}. This is it. We know it's
 11 dated March 2008, I think.
 12 Were you aware that the NBS specification on the
 13 Grenfell project required compliance with this CWCT
 14 standard?
 15 A. No.
 16 Q. So that wasn't something you picked up from reading the
 17 NBS specification?
 18 A. No.
 19 Q. And it wasn't something you discussed with Kevin Lamb?
 20 A. No.
 21 Q. Sorry, it's actually dated September 2008,
 22 not March 2008. That was my error.
 23 Had you ever come across this document at the time
 24 of the Grenfell project?
 25 A. I can't remember. I became very familiar with it during

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1 the time of doing the MSc at Bath. But I can't remember
 2 knowing much about it before then.
 3 Q. Do you recall consulting this document at the time of
 4 the Grenfell project?
 5 A. No.
 6 Q. Okay.
 7 I want to look now at the topic of insulation and
 8 explore that in a little more detail, and the process of
 9 selecting the insulation which was used on the tower.
 10 If we can start with paragraph 21 of your witness
 11 statement, this is {HAR00010149/5}. So paragraph 21,
 12 you say:
 13 "I have no specific memory of the design as my
 14 involvement in the Grenfell project was rather limited
 15 (most of my time was taken up with working on other
 16 projects ...)"
 17 Then four lines down you say:
 18 "From my reading of media reports and review of
 19 Studio E and Harley drawings brought to my attention,
 20 I can see that it was a traditional rail system with
 21 hook on cladding panels for the rainscreen and
 22 a phenolic insulation used for the thermal performance."
 23 Do you see that there?
 24 A. Yes.
 25 Q. So does it remain your evidence that you have no

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1 recollection from the time about the products that were
 2 used and that you only became aware of the products
 3 being used from media reports?
 4 A. Prior to having these conversations and looking at the
 5 stuff in the media, I couldn't remember -- I wouldn't
 6 have been able to recall what was on the building.
 7 Q. Did that apply to the insulation, that you couldn't
 8 recall what was on the building in terms of insulation?
 9 A. Yes.
 10 Q. Now, you talk there about the phenolic insulation being
 11 used for thermal performance, in the third line from the
 12 bottom and the second line from the bottom there.
 13 Did you realise at the time that the Celotex product
 14 that was used as the main insulation, RS5000, was a PIR
 15 insulation, not a phenolic insulation. So it was
 16 a polyisocyanurate insulation?
 17 A. No.
 18 Q. You weren't aware of that at the time?
 19 A. No.
 20 Q. Then at paragraph 22, in the next paragraph of your
 21 statement, you say this in the first lines:
 22 "As far as the manufacture of the cladding and
 23 insulation is concerned I have no specific memory of
 24 this. Having read media reports and material related to
 25 this case; I understand that Celotex was used for the

1 insulation and Reynobond Aluminium Composite
 2 Material ... for the cladding."
 3 Then you also understand that Siderise products were
 4 used.
 5 Now, if we can turn back to the NBS specification at
 6 {SEA00000169/73} and look at item 776 at the top of the
 7 page. So this is, again, within the H92 section of the
 8 NBS specification.
 9 A. Yes.
 10 Q. Here we can see item 776 is the thermal insulation, and
 11 we can see if we keep reading down that that, after the
 12 second bullet point, there's a little indented line and
 13 then it says:
 14 "Product reference: FR5000 ..."
 15 Do you see that there?
 16 A. Yes.
 17 Q. Above that was:
 18 "Manufacturer: Celotex Ltd ..."
 19 Do you see that there?
 20 A. Yes.
 21 Q. Do you remember noticing in the NBS specification that
 22 the insulation that had been specified for
 23 Grenfell Tower was the Celotex FR5000 product?
 24 A. Not looking back on it, I can't remember, no.
 25 Q. Does it remain your evidence that you have no specific

1 memory of the manufacturer of the insulation?
 2 A. Up until I was -- you know, until it came out in the
 3 media, I wouldn't have been able to tell you before that
 4 happened.
 5 Q. Now, we know that the product that was in fact used on
 6 the tower was RS5000, a Celotex product. Do you agree
 7 that there was therefore a change in the specification
 8 from FR5000 that we see here to RS5000?
 9 A. Yes.
 10 Q. Do you have a memory of that occurring on the project,
 11 there being a change in the specification between FR and
 12 RS5000?
 13 A. No.
 14 Q. Were you aware of anyone at Harley considering the
 15 suitability of the FR5000 product for the Grenfell
 16 refurbishment?
 17 A. No.
 18 Q. Would you have thought that was part of Kevin Lamb's
 19 responsibility as project designer, to consider the
 20 suitability of FR5000?
 21 A. I would have thought it was the responsibility of the
 22 architect and Building Control.
 23 Q. Does that mean that they could say put anything on the
 24 building and Harley would just build it? How far does
 25 that go?

1 A. Generally it goes that if they put something in the
 2 specification, we obtain the datasheets and submit them
 3 back for approval, and if they approve them, then we
 4 believe that they're right to be used. Because in
 5 things like fire, there wasn't anyone working at Harley
 6 who was trained in that at that time.
 7 Q. Wouldn't you even --
 8 A. So if it was something structural that I understand --
 9 understood more about, I would challenge them on it and
 10 argue it if I believed that it was wrong. But when it's
 11 something that you're not trained in, you have to rely
 12 on the expertise of the people who are trained in it.
 13 Q. Does that mean that there wouldn't even have been
 14 a cursory examination within Harley of the fire
 15 performance of the material?
 16 A. Not that was required. I would do it on other projects
 17 that -- I would try and read it and see if it was my
 18 understanding of being compliant, but I'd always refer
 19 it back.
 20 Q. So did anyone do that on the Grenfell project? Did
 21 anyone do a cursory examination of the material
 22 specified for the insulation to check that it had basic
 23 compliance?
 24 A. I think prior to -- I think at the point that Harley was
 25 at when this was going on, this was always done early on

1 because we had a technical manager who was part of the
 2 estimating department who was trained in these things,
 3 and I think at this point there wasn't anybody in the
 4 business who could do that. So we did it individually
 5 by satisfying ourselves as well as we could by passing
 6 it back, but I don't think there was a particular
 7 company policy that you had to follow.
 8 Q. So does that mean that, as far as you're aware, no
 9 cursory examination of the fire performance of these
 10 materials was done by Harley?
 11 A. Not as far as I'm aware, no.
 12 SIR MARTIN MOORE-BICK: Help me with this: when you say
 13 "passing it back", can you just explain exactly what you
 14 mean, for example, in relation to insulation?
 15 A. So you would -- it would be a prescriptive specification
 16 and you would then go and obtain the datasheets from the
 17 supplier, and then you would send that to the client's
 18 design team and Building Control for approval.
 19 SIR MARTIN MOORE-BICK: And the client's design team in this
 20 case being?
 21 A. It would be the architects, structural engineer, fire
 22 consultant.
 23 SIR MARTIN MOORE-BICK: And did you do that?
 24 A. I wasn't the design manager on it -- sorry, I wasn't the
 25 designer on it.

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1 SIR MARTIN MOORE-BICK: Do you know if anyone else did that?
 2 A. No.
 3 SIR MARTIN MOORE-BICK: You don't know or you know they
 4 didn't?
 5 A. I don't know if they did or didn't.
 6 SIR MARTIN MOORE-BICK: Thank you.
 7 Sorry, Ms Grange.
 8 MS GRANGE: Did you ever tell Kevin Lamb that it was part of
 9 his responsibilities to be doing that?
 10 A. I think, because I had worked with him before and that
 11 was what we had done before, I was under the expectation
 12 that he knew that that was what was required.
 13 Q. I see.
 14 Let's look at a document now relevant to the
 15 insulation. This is {CELO0001237}. So this is an email
 16 from Jonathan Roome of Celotex to Ben Sharman at
 17 Harley Curtain Wall on 6 August 2014. So this is before
 18 Kevin Lamb's appointment, yes, when you are holding the
 19 fort -- is that right? -- on the project?
 20 A. Pardon?
 21 Q. You're holding the fort, aren't you, at this point on
 22 the design work on the Grenfell project, August 2014?
 23 A. Yes, I'm not sure when Kevin -- when we were talking
 24 to -- yes, but, yeah, I was holding the fort as you put
 25 it.

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1 Q. So in the email we can see that Jonathan Roome says to
 2 Ben Sharman:
 3 "Hi Ben,
 4 "Good to speak to you again.
 5 "I have the pleasure of informing you as of
 6 yesterday we have now launched the first PIR Board To
 7 Successfully Meet The Performance Criteria In BR 135 For
 8 Insulated Rainscreen Cladding Systems, Therefore
 9 Acceptable For Use In Buildings Above 18m In Height.
 10 "I would like to come into the office when everyone
 11 is around to present formally the new product.
 12 "In the meantime if you would like me to run any
 13 U-Value calculations please let me know.
 14 "Kind regards,
 15 "Jonathan."
 16 Do you see that there?
 17 A. Yes.
 18 Q. Were you aware before this time that the RS5000 product
 19 was going to be launched? Did you have any awareness of
 20 that?
 21 A. No.
 22 Q. Did Jonathan Roome come in and formally present the new
 23 product to Harley?
 24 A. I can remember that he used to come into the office
 25 quite a bit. I can remember that he used to come in and

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1 check that Grenfell was still using the Celotex product,
 2 but I can't remember him specifically doing
 3 a presentation.
 4 Q. So you can't remember when any such presentation might
 5 have happened?
 6 A. No. I mean, I was working a lot at Trinity Square and
 7 wasn't always in the office. I was based in London
 8 quite a lot.
 9 Q. Do you have a recollection of actually being present
 10 when Mr Roome came in to present the new product?
 11 A. I don't remember any presentation, no.
 12 Q. We can see at paragraph 23 of your witness statement, if
 13 we pull this up -- this is at {HAR00010149/6} -- you
 14 say:
 15 "In relation to the use of Celotex I do remember
 16 a representative of Celotex visiting Harley's offices
 17 a number of times to discuss the Celotex product.
 18 I cannot remember exactly what he said but I do remember
 19 that part of the Celotex sales pitch was that Celotex
 20 could be used on buildings over 18 metres tall. I also
 21 remember the bright pink Celotex brochures which were
 22 handed out."
 23 Do you see that there?
 24 A. Yes.
 25 Q. Now, can you remember which Celotex representative it

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1 was who visited the Harley offices a number of times?
 2 A. It was Jonathan Roome.
 3 Q. Yes. And approximately how many times do you think he
 4 might have come in to discuss the Celotex product with
 5 Harley?
 6 A. He used to come in every couple of weeks so, you know,
 7 over a year it would be, you know, maybe sort of 30
 8 times or something.
 9 Q. Okay. So quite frequently he was there?
 10 A. Yes, I mean, he did -- before -- as I said before,
 11 before working for Celotex he worked for a different
 12 company that was more aligned with what I did as
 13 a structural engineer, and I can't actually remember the
 14 point at which he changed companies, but we used to see
 15 him quite a bit.
 16 Q. So approximately how long had you known him for as at
 17 2014? Can you remember? You say you knew him at
 18 a different company? Was that Hilti that he was at
 19 before?
 20 A. Yes, it was.
 21 Q. Was that the company you knew him at?
 22 A. Yes.
 23 Q. Can you remember how long before you'd known him for?
 24 A. A number of years, because in my role, you know,
 25 carrying out the structural design, I had to specify the

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1 structural fixings, and more often than not specified
 2 Hilti.
 3 Q. And had you had a close professional working
 4 relationship with him on previous projects?
 5 A. Yes.
 6 Q. You knew him well?
 7 A. Yes.
 8 Q. Were you aware when you were working on the Grenfell
 9 project that Celotex FR5000 and RS5000 were marketed as
 10 different products, but were in fact comprised of the
 11 same materials?
 12 A. I don't think until -- I don't think I was overly aware
 13 that -- I wouldn't be able to look back and say that it
 14 was called RS5000, so I had no knowledge that there was
 15 two different ones.
 16 Q. Does it follow that you never asked anyone at Celotex if
 17 there were differences between the FR and the RS5000
 18 products?
 19 A. Yes, I didn't know that the FR existed. I didn't know
 20 really what the RS was.
 21 Q. Going back to the meetings with Celotex about this
 22 launch of this new product, which you say you were aware
 23 of and you remember bright pink brochures that were
 24 handed out, were you aware that this was being presented
 25 as a product for dedicated use on rainscreen cladding

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1 projects?
 2 A. No, I was just -- I can just remember that it was
 3 something that they said could be used over 18 metres.
 4 Q. You talk about it as a sales pitch that could be used on
 5 buildings over 18 metres. Did Celotex ever qualify that
 6 sales pitch in any way when discussing the project with
 7 you?
 8 A. Not that I can remember, no.
 9 Q. Sorry, when discussing the product with you.
 10 A. No.
 11 Q. Do you remember Celotex ever saying that FR5000 was not
 12 safe to use on buildings over 18 metres in height?
 13 A. No.
 14 Q. What steps did you take to test and verify the sales
 15 pitch for the RS5000 to check that it could be used on
 16 buildings above 18 metres?
 17 A. I can't remember using it on any of the projects that
 18 I was the designer on, so I didn't take any steps.
 19 Q. So you're not aware that any steps were taken on the
 20 Grenfell project to verify the sales pitch for the
 21 RS5000 as suitable for above 18 metres?
 22 A. No.
 23 Q. Would you have expected Kevin Lamb to have checked the
 24 sales pitch that it could be used on buildings above
 25 18 metres?

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1 A. I would expect that he would have told the architect
 2 what product was going on there so that they could get
 3 that checked, and that Rydon would have been told what
 4 product was going on there so they could check with
 5 Building Control.
 6 Q. As far as you were concerned, did you just take
 7 Celotex's word for it that Celotex RS5000 could be used
 8 on buildings above 18 metres?
 9 A. At the time I wasn't using it on any of the projects
 10 I was working on, so I didn't question it.
 11 Q. But you're the design manager for the Grenfell project.
 12 Why would it not have occurred to you to have made sure
 13 that someone checked that that product was suitable for
 14 above 18 metres?
 15 A. Because I was responsible for making sure that Kevin was
 16 keeping to programme. I wasn't educated in how to check
 17 fire compliance.
 18 Q. We'll see later that you do actually send an email in
 19 September 2014 about the insulation, attaching the
 20 datasheet for it and making comments on its fire
 21 performance. So if your role was solely about programme
 22 and structural matters, why would you have been doing
 23 that in September 2014?
 24 A. I can't remember, but I don't think it would have been
 25 in relation to Grenfell.

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1 Q. Okay, well, we'll come and look at that in due course.
 2 When Celotex came in to Harley, do you remember ever
 3 showing their representatives drawings of
 4 Grenfell Tower?
 5 A. Not as far as I remember, no.
 6 Q. Do you think anyone else at Harley showed Celotex
 7 drawings of Grenfell Tower?
 8 A. They may have done. I mean, to have got a price to have
 9 put in the budget, I would have thought that the
 10 estimating team would have discussed quantities and the
 11 building in that way.
 12 Q. Well, at the time when the budget was prepared, this
 13 RS5000 product wasn't launched, so --
 14 A. But if it had been in the specification, they must have
 15 had something to price against.
 16 Q. I see.
 17 Can you recall any discussions that Harley had with
 18 Celotex about the specific cladding system that was
 19 proposed to be used at Grenfell?
 20 A. I don't -- no, I don't recall.
 21 Q. Now, can we turn to an email chain from May 2014, so
 22 earlier in 2014. If we look at this, {CEL00003119/3} at
 23 the bottom, an email dated 14 May from a colleague of
 24 yours, Tim Bennett. This is to Kingspan's general email
 25 address in March 2014 at 13.20. It's about the water

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1 resistance of the K15 product.
 2 Then if we go to the next email up in this little
 3 chain and look at that, we can see Tim Bennett from
 4 Harley then emails, on 14 May 2014, Jonathan Roome,
 5 ccing you in relation to Waylands House. Do you see
 6 that there?
 7 A. Yes.
 8 Q. He says:
 9 "Morning Jon,
 10 "Please see the below email. On our Waylands House
 11 project we have a K15 specified insulation to be
 12 installed behind the ACM rainscreen. As per my email
 13 below I have asked whether the K15 is suitable to
 14 an area which may be sat in water. Kingspan have
 15 confirmed that the K15 is not suitable.
 16 "Do you have an alternative product we can put
 17 forward?"
 18 Do you see that there?
 19 A. Yes.
 20 Q. So that's copied to you in May 2014, you're asking
 21 Jonathan Roome about an alternative product.
 22 Then if we go to the top of page 2 {CEL00003119/2},
 23 an email of 14 May at 10.38, we see there
 24 Mr Jeremy Suttle, the technical services officer at
 25 Celotex, to Tim Bennett -- you're not copied into this

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1 bit of the string -- ccing Jonathan Roome and saying:
 2 "Good morning Tim,
 3 "Can you please confirm the height of the building
 4 that the insulation will be used in."
 5 Do you see that there?
 6 A. Yes.
 7 Q. Then if we look at the bottom of page 1 {CEL00003119/1},
 8 there's an email, details about the height of the
 9 building are provided. You see at the bottom of that
 10 Tim Bennett goes back and says:
 11 "The building is 20 storeys and +60m in total
 12 height."
 13 Then what we see immediately above that is
 14 Jeremy Suttle coming back and saying:
 15 "Thank you for conformation(sic). Unfortunately in
 16 this case we would not be able to provide a solution as
 17 Celotex is only tested up to 18 meters(sic) in height."
 18 Do you see that there?
 19 A. Yes.
 20 Q. So this is before the launch of RS5000 in August 2014,
 21 a query from Harley about whether or not Celotex have
 22 a suitable insulation product in replacement of the K15,
 23 and Celotex are coming back and saying no because it's
 24 not tested up to 18 metres in height. Do you see that
 25 there?

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1 A. Yes.
 2 Q. Now, did Mr Bennett at Harley make you aware of this
 3 email string and the fact that Celotex insulation was
 4 not suitable for use above 18 metres?
 5 A. No.
 6 Q. Were you aware of that from any other information or
 7 sources at the time?
 8 A. No.
 9 Q. So you weren't aware as at May 2014 that Celotex did not
 10 have a product suitable for over 18 metres?
 11 A. No, I wasn't aware.
 12 Q. Now, if we then pick up the story again back in August
 13 and look at an email at {CEL00011960}. This is an email
 14 from Jonathan Roome to you on 27 August 2014, so this is
 15 after Kevin Lamb's appointment, which was around
 16 12 August 2014, and he says:
 17 "Hi Dan,
 18 "Good to speak to you again (as always).
 19 "For now here is all of the info that I have on the
 20 RS5000 Rainscreen product for use over 18m.
 21 "When you have a moment please can you send me
 22 across some drawings and an idea of who you would look
 23 to use for the supply chain.
 24 "Speak again in a couple of weeks.
 25 "P.S. ... has the Waylands House ship sailed?

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1 "Kind regards,
 2 "Jonathan."
 3 I should have noted in the subject at the top that
 4 the subject is "Grenfell Tower, [and also] Hammersmith -
 5 RS5000 Data". Do you see that there?
 6 A. Yes.
 7 Q. We also see that a "Rainscreen" zip file is attached by
 8 Mr Roome to you at that point. Do you see that there?
 9 A. Yes.
 10 Q. Now, we can see that this obviously followed
 11 a conversation between you and Mr Roome. He says:
 12 "Good to speak to you again (as always)."
 13 Can you remember what the purpose of that call was
 14 or anything about it?
 15 A. I think generally he was always calling to make sure
 16 that they were still in specifications and that the
 17 specifications hadn't been changed by the architect.
 18 That's the general sort of way that the conversations
 19 went and whether we -- what projects we had coming up.
 20 Q. If he was ringing to discuss the specifications on the
 21 Grenfell Tower project, can you remember what you said
 22 to him about that?
 23 A. I probably would have said that it's still down as the
 24 Celotex product, I imagine, but --
 25 Q. I thought you said you --

1 A. -- I can't remember.
 2 Q. Sorry, finish your answer.
 3 A. I can't remember. I'm assuming, to be honest.
 4 Q. I thought you said earlier that you weren't aware that
 5 it was the Celotex FR5000 product that had been
 6 specified?
 7 A. Yeah, if you'd asked me before any of this happened,
 8 I wouldn't have been able to look back and remember what
 9 the product was.
 10 Q. But looking at this now, do you think it's likely that
 11 you discussed with Mr Roome what the specification for
 12 the insulation at Grenfell Tower was?
 13 A. Yes, looking at this.
 14 Q. Yes.
 15 Now, we have the attachments in the zip file and it
 16 included a pack of documents relevant to the RS5000
 17 product. I'm going to take you through a number of
 18 those documents. It included a Celotex product
 19 comparison sheet, an LABC certificate for the product,
 20 a BRE global test report, a rainscreen cladding
 21 compliance guide and a rainscreen cladding specification
 22 guide. So a pack of documents is being sent to you by
 23 Mr Roome in that zip file.
 24 Can you recall reading any of those documents at
 25 this time?

1 A. I've looked at these from the other evidence and I can't
 2 remember having ever seen them at the time. I think, to
 3 be honest, those kinds of things I wasn't educated in,
 4 and so I tended to pass them on -- you know, on other
 5 projects, I would always pass them on to people who were
 6 educated in that way.
 7 Q. You said in your witness statement, and we looked at it
 8 earlier, that you remember the pink brochures.
 9 A. Yes.
 10 Q. You remember the cover of the pink brochures. Does that
 11 mean you think you read those pink brochures?
 12 A. Again, not in detail. The most I knew about at that
 13 point was probably U-values. I understood what U-values
 14 were and what U-values needed to be achieved. But for
 15 anything else I would have passed it on.
 16 Q. Were you aware that this was quite a significant
 17 development in terms of cladding insulation, the
 18 development of a Celotex product that could be used on
 19 buildings above 18 metres? Do you remember being struck
 20 that that was an important development at the time?
 21 A. I can remember at the time that Jonathan used to say
 22 that it was a very important development, but from my
 23 understanding of the industry, I didn't know it was
 24 an important development, but I took his word on it.
 25 Q. So you didn't know it was an important development. You

1 didn't know that, prior to that, K15 had been the only
 2 insulation product that had been regularly used on
 3 buildings above 18 metres that was of a phenolic or, you
 4 know, similar nature? Did you not know that, that K15
 5 had often been specified in that way prior to this?
 6 A. All I can remember from the time is Jonathan saying that
 7 this was the first product to be specified for use for
 8 over 18 metres, so I thought that it was the only one.
 9 I didn't know that K15 could be.
 10 Q. I see. You hadn't really thought about K15 before this?
 11 A. No.
 12 Q. No, okay.
 13 Did you pass these documents on to anyone else
 14 within Harley after they were sent to you?
 15 A. I don't have any memory of it, I'm afraid.
 16 Q. Or to Studio E or Rydon?
 17 A. If I'd been the designer on a project, that would have
 18 been my normal course of action, but I can't remember
 19 doing it on this one.
 20 Q. I see.
 21 Let's turn to the LABC registered details
 22 certificate to start with. This is at {CEL00000009}.
 23 Were you aware at this time of who the LABC were,
 24 Local Authority Building Control? Were you aware of
 25 that organisation?

1 A. No.
 2 Q. So that didn't mean anything to you?
 3 A. No.
 4 Q. We can see at the top that it says, second line down in
 5 the table:
 6 "RS5000 PIR insulation board."
 7 Do you see that there? "PIR", do you see the
 8 reference to "PIR" at the top?
 9 A. Yes.
 10 Q. Were you aware what PIR meant?
 11 A. No.
 12 Q. So you didn't know it meant polyisocyanurate?
 13 A. No.
 14 Q. Did you give any thought to what type of insulation this
 15 was when this pack of material came through?
 16 A. I think that I just thought that it was a more highly
 17 performing insulation and, yes, I think that was about
 18 it.
 19 Q. Okay.
 20 Under "Limitations of use", further down, you see
 21 that title on the left-hand side, four boxes down, it
 22 says:
 23 "For use in rainscreen wall construction including
 24 above 18 metres height. The required thickness of board
 25 for a particular construction must be established with

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1 the use of the Celotex online calculator."
 2 Do you remember noting that?
 3 A. No.
 4 Q. That first line there, it says:
 5 "For use in rainscreen wall construction including
 6 above 18 metres height."
 7 Did you notice that at the time, that they were
 8 saying it could be used in buildings above 18 metres?
 9 A. Yes. But not on this document.
 10 Q. Did you consider that this meant that the product could
 11 be used on any building over 18 metres, regardless of
 12 the other components in the external wall?
 13 A. Yes.
 14 Q. Now, can I ask you to read the paragraph below. Under
 15 "Advice Notes", it says:
 16 "Celotex RS5000 can be used with a variety of
 17 cladding systems (including masonry or rainscreen
 18 systems) and can be fixed back to a structural steel
 19 frame with a sheathing board or direct back to masonry."
 20 Do you see that there?
 21 A. Yes.
 22 Q. Then if we keep going in that section, it says:
 23 "Celotex RS5000 has successfully tested to
 24 BS 8414:2 2005, meets the criteria set out in BR 135 and
 25 therefore is acceptable for use in buildings with

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1 storeys above 18m in height ..."
 2 Do you see that there?
 3 A. Yes.
 4 Q. Did you note that at the time, that it had been
 5 successfully tested to that test standard?
 6 A. All I can remember is what was -- what I was being told
 7 by their sales rep and what was on their -- the outside
 8 of the pink brochure, that it was used -- you know,
 9 acceptable for use in buildings above 18 metres.
 10 Q. Is that all you recall being told by their sales rep?
 11 A. And that it was the first one that was, you know, the
 12 first of that kind of high-performance insulation that
 13 could be used in buildings over 18 metres.
 14 Q. Yes.
 15 It ends there by talking about alternative
 16 compliance to ADB, do you see that there --
 17 A. Yes.
 18 Q. -- in that paragraph we were just reading? Did that
 19 mean anything to you at the time?
 20 A. Alternative compliance wouldn't have meant anything to
 21 me at the time, but, looking back on it, I imagine that
 22 was, you know, the desktop studies that people would
 23 sometimes mention, and you would send it off to the
 24 design team to be checked.
 25 Q. Okay. It then says:

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1 "The product has been tested and achieves
 2 a 'Class 0' spread of flame."
 3 Do you see that there?
 4 A. Yes.
 5 Q. Do you remember noticing that at the time?
 6 A. I can't remember.
 7 Q. Can you help us as to what you considered the relevance
 8 to be of the fact that the insulation had achieved
 9 class 0?
 10 A. At the time, to me, class 0 meant that it couldn't catch
 11 fire.
 12 Q. So did you read the information about class 0 in this
 13 pack of information and conclude something from that?
 14 A. I can't remember. I don't think so.
 15 Q. Again, we'll look at it in due course, but
 16 in September 2014 you send an email saying that the
 17 insulation is class 0, so can you remember knowing at
 18 the time that piece of information?
 19 A. If I sent an email, I must have looked at something to
 20 tell me that, yes.
 21 Q. Okay.
 22 Do you think that the insulation being class 0
 23 affected the decision to use it on the Grenfell project?
 24 A. Looking back on that period of time, I think that the
 25 classifications were misleading. I don't think that

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1 anybody fully understood what class 0 meant, you know,
 2 from the very highest, most qualified architects through
 3 to people like me, you know, doing detailed design and
 4 structural engineering.

5 Q. Let me put the question in a different way: were you
 6 aware within Harley that the fact that the insulation
 7 was class 0 made a difference to it being selected for
 8 use on the Grenfell project?

9 A. No, because -- well, as far as I was aware, it was
 10 prescriptive specification, so Harley wouldn't have
 11 looked at it as class 0 and chosen it; they would have
 12 seen that it had been chosen and probably looked to see
 13 if they believed it met the requirements or not.

14 Q. Okay.

15 Let's look at another of the documents sent to you
 16 by Mr Roome on 27 August, the Celotex rainscreen
 17 cladding specification guide. This is {CEL00000013}.

18 So here we've got the pink cover to this
 19 specification guide, which you say in your witness
 20 statement you do remember seeing; is that right?

21 A. I remember the pink of it. I couldn't say it was
 22 definitely this one.

23 Q. Do you think you read this document at the time you were
 24 sent it by Mr Roome?

25 A. I don't think I would have. I think I would have

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1 probably -- he probably would have shown it to me and
 2 pointed out what he believed the key aspects were, but
 3 it wasn't my area of expertise.

4 Q. Whose job was it on the Grenfell project to read this
 5 Celotex specification guide for the RS5000 insulation?

6 A. Within Harley, I don't know.

7 Q. You don't know?

8 A. No.

9 Q. So you didn't think that Kevin Lamb read this?

10 A. If Kevin had satisfied himself that the product had been
 11 checked by the architect and Building Control, I don't
 12 believe he would need to read it.

13 Q. Okay.

14 Now, if we go on within this document at page 5
 15 {CEL00000013/5}, we can see, if we look at the top of
 16 the page, we've got a section for "Fire Performance".
 17 It says there:
 18 "Fire Performance.
 19 "Rainscreen Insulation.
 20 "Celotex RS5000 is Class 0 fire rated as described
 21 by the national Building Regulations ..."
 22 And it talks about two tests that it's passed there.
 23 Do you see that there?

24 A. Yes.

25 Q. Or one it's passed and the other one it's got

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1 a classification for it, just to be accurate.

2 So did you notice the reference to class 0 in this
 3 specification guide at the time?

4 A. As you said by the email that you've mentioned, I must
 5 have noticed it at some point, but I have no memory of
 6 it.

7 Q. Okay.

8 And then for "Building above 18 metres" further down
 9 that column, it says:
 10 "Celotex RS5000 has been successfully tested to
 11 BS 8414 ..."
 12 Then it explains what that test method is.
 13 "... meets the criteria set out in BR 135 and is
 14 therefore acceptable for use in buildings above
 15 18 metres in height."
 16 Do you see that there?

17 A. Yes.

18 Q. Again, can you recall reading that in this guide?

19 A. No, I can't recall reading it in the guide. I recall
 20 being told it and having it pointed out to me, but I had
 21 no knowledge of what BS 8414 was or BR 135, and if I'd
 22 been shown this on another project, I would have sent it
 23 off to others to check.

24 Q. So does it follow that you didn't form a view about
 25 whether this meant that the RS5000 could be used on

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1 Grenfell Tower?

2 A. No, I wouldn't have formed a view on it because I wasn't
 3 educated on that.

4 Q. Now, this guide set out the nature of the system that
 5 had been tested. If we go immediately below and look at
 6 the bottom of that page, it says:
 7 "The system tested to BS 8414-2: 2005 was as
 8 follows ..."
 9 Do you see that there?

10 A. Yes.

11 Q. And we can see that they've told you what the system
 12 was, and it begins with, "12mm fibre cement panels".
 13 Do you remember noticing, in either this
 14 specification guide or indeed any of the other
 15 literature about RS5000, that it had been tested on
 16 a specific cladding system? Do you remember noticing
 17 that?

18 A. No.

19 Q. You weren't aware of that at the time?

20 A. No.

21 Q. So you weren't aware that it had been tested with fibre
 22 cement panels as the rainscreen panel in those tests?

23 A. No.

24 Q. So you didn't notice that that was different to the
 25 rainscreen system at Grenfell, which had aluminium

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1 composite material panels? You didn't notice that?
 2 A. No.
 3 Q. Now, you talked just a moment ago about what you'd been
 4 told by the Celotex representative. Did the Celotex
 5 representative ever tell you anything about the specific
 6 system that had been tested? Did he go into those
 7 details?
 8 A. No.
 9 Q. And then if we look at the column on the right, if we
 10 can go back up to the top of the page, in the third
 11 paragraph down on the right we get this, it says:
 12 "The fire performance and classification report for
 13 Celotex RS5000 only relates to the components detailed
 14 above. Any changes to the components listed will need
 15 to be considered by the building designer."
 16 Do you see that there?
 17 A. Yes.
 18 Q. Do you remember reading that statement or any similar
 19 statement in any of this Celotex RS5000 literature?
 20 A. No.
 21 Q. Had you read that, who would you have thought needed to
 22 consider it? It talks about the "building designer".
 23 A. The building designer to me would be the architect.
 24 Q. Let's turn to another of the documents. This is the
 25 rainscreen cladding compliance guide, and this is

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1 {CEL00000012}, and it was another document you were
 2 provided with by Mr Roome on 27 August 2014. Again,
 3 this has got the pink cover.
 4 Do your answers kind of follow over, that you don't
 5 recall reading this in any detail at the time?
 6 A. No, because it wasn't what I was trained in.
 7 Q. If we can go to page 3 {CEL00000012/3}, in the far
 8 right-hand column, we get more information about the
 9 performance criteria here. There's a discussion about
 10 BR 135 and, again, we get the statement in that final
 11 paragraph:
 12 "The classification applies only to the system as
 13 tested and detailed in the classification report ...
 14 [It] can only cover the details of the system as tested.
 15 It cannot state what is not covered. When specifying or
 16 checking a system it is important to check that the
 17 classification documents cover the end-use application."
 18 Do you see that there?
 19 A. Yes.
 20 Q. Again, is it your evidence that you don't recall ever
 21 being aware of that caveat in this pack of information?
 22 A. No, I don't recall that, no.
 23 Q. If you go to page 4 {CEL00000012/4} in the middle of the
 24 page, we can see at the top of the page that the system
 25 tested is again listed, but this time we've also got

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1 a diagram of the system below that. If we can pull up
 2 that diagram -- exactly. So there we can see the system
 3 that was tested, and you can see on the second label
 4 down, "12mm Marley Eternit Natura panel". Do you see
 5 that there?
 6 A. Yes.
 7 Q. Would that have been something you were familiar with at
 8 the time, a Marley Eternit Natura panel?
 9 A. It's not a product that I'd used before.
 10 Q. So it wasn't a product that you'd used on a rainscreen
 11 system before?
 12 A. No.
 13 Q. Is it your evidence that you didn't notice at the time
 14 that the system that was tested was with that product
 15 that you didn't recognise?
 16 A. No, I didn't notice that.
 17 Q. Then if we go back up the page again -- sorry, we've
 18 already seen the warning, sorry.
 19 Did you ever discuss anything about the Marley
 20 Eternit Natura panel with Mr Roome?
 21 A. I don't believe so, no.
 22 Q. You don't remember him mentioning that that was the
 23 panel that had been used in the test?
 24 A. No.
 25 Q. Did you ever have any doubts in your mind about whether

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1 the system ought to be used at Grenfell, or was that
 2 simply something that you just didn't apply your mind
 3 to?
 4 A. Yeah, because it was relating to fire performance and
 5 thermal performance that I wasn't trained in, you know,
 6 I applied my mind to the structural performance on
 7 Grenfell.
 8 Q. Can we also turn now to the BRE global test report that
 9 Mr Roome sent over. This is {CEL00000011}. It's dated
 10 11 August 2014. Can you see that? That's the cover for
 11 this test report, and it's a classification report in
 12 accordance with BR 135.
 13 Do you remember ever reading this document at the
 14 time?
 15 A. No.
 16 Q. If we go to page 2 {CEL00000011/2} at item 2.1, it sets
 17 out the full details of the system that's tested there.
 18 Do you see that there?
 19 A. Yes.
 20 Q. Again, does that bring back any memory of looking at
 21 that?
 22 A. No.
 23 Q. If we go to page 4 {CEL00000011/4}, paragraph 5.3, under
 24 the heading "Field of application", do you see it says
 25 there:

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1 "This classification is valid only for the system as
 2 installed and detailed in Section 2 of this
 3 classification report and the associated details found
 4 in the related test reports ..."
 5 Do you see that there?
 6 A. Yes.
 7 Q. Again, is it your evidence that you didn't notice that
 8 at the time?
 9 A. No.
 10 Q. You didn't read that?
 11 A. No.
 12 Q. Did you at any time query with Celotex or anyone else
 13 whether there was a desktop study to support the use of
 14 RS5000 for the system at Grenfell?
 15 A. On Grenfell, no. I know that I sent other desktop
 16 studies off for other jobs, but I can't remember what
 17 products they were for.
 18 Q. Did you ever check on Grenfell whether anyone else was
 19 asking for a desktop study or other assessment to
 20 support the system at Grenfell?
 21 A. No.
 22 Q. Whose responsibility did you think that was?
 23 A. If the product had been specified by the architect,
 24 which I believed it had been, then I believe it would
 25 have been their responsibility to ensure that a desktop

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1 study had been carried out.
 2 Q. But, Mr Anketell-Jones, we've seen that the product that
 3 was specified was the FR5000 product, and we've seen
 4 Celotex saying in May 2014 that that product wasn't
 5 suitable for use above 18 metres. Is it your evidence
 6 that you simply weren't aware that this was a different
 7 product?
 8 A. Yes. I wasn't aware of -- that there was a difference
 9 in the products, and looking back on it, I thought we
 10 were just following the specification, in which case
 11 I would have thought that it had been checked fully by
 12 the architect.
 13 Q. But how could you have thought that when you said you
 14 knew this was a new product that was being launched, the
 15 first product to be used above 18 metres?
 16 A. I had no concept that it hadn't already been checked
 17 through with desktop studies at that point. I didn't
 18 realise that the timelines worked that way. I thought
 19 that it had already been signed off.
 20 Q. Okay.
 21 Can I ask you to turn to Mr Ray Bailey's witness
 22 statement. This is {HAR00010184/42} and look at
 23 paragraph 170. Do you see that there? He's asked the
 24 question:
 25 "Did Harley rely on any advice from third parties

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1 about the compliance of the design ..."
 2 And he says:
 3 "As described previously, we relied upon/took into
 4 consideration advice from Studio E in respect of the
 5 position of cavity barriers, Siderise in respect of the
 6 confirmation of the specification of the cavity
 7 barriers, and from manufacturers in relation to the
 8 suitability of the Reynobond ACM and Celotex RS5000."
 9 Do you see that there?
 10 A. Yes.
 11 Q. Did you ever take any specific advice from Celotex about
 12 the use of RS5000 on the Grenfell building?
 13 A. No, not that I remember.
 14 Q. Now, if we look at paragraph 42 of your witness
 15 statement -- this is {HAR00010149/10} -- you say there:
 16 "This type of phenolic insulation was used very
 17 frequently at the time. The main ones were Kingspan and
 18 Celotex. At the time Celotex described it as Class 0
 19 and claimed that it was suitable for use on buildings
 20 over 18 metres and were pushing it heavily (as I have
 21 described in answer to question 4b). But they were not
 22 drawing people's attention to the exact configuration
 23 that allowed it to be used on buildings over 18 metres."
 24 Do you see that there?
 25 A. Yes.

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1 Q. Now, can you explain why you're saying there that they
 2 were not drawing people's attention to the exact
 3 configuration given the documents that we've just looked
 4 at?
 5 A. Because when I look back on it now, having read those
 6 documents, I have no recollection of them drawing our
 7 attention to that.
 8 Q. Are you saying that you personally didn't have the exact
 9 configuration drawn to your attention? Is that why
 10 you're saying that?
 11 A. Yes.
 12 Q. Are you saying that you personally were confused by the
 13 Celotex marketing literature as to what compliance
 14 standards the product had actually achieved?
 15 A. I think at the time I didn't have enough knowledge on it
 16 to even probably be confused. I would take what they
 17 were saying and then I would pass it on to people who
 18 understood it.
 19 Q. Yes. If you didn't actually read any of the documents
 20 I just took you to -- and I think that was your
 21 evidence -- how could you have become confused?
 22 A. That's my point. I don't think I understood enough
 23 about it to even be confused. I think with other things
 24 that you're educated on, you can become confused about
 25 it and not understand what people are getting at. But

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1 on something where you literally have no training, you
 2 literally just take what you're given. You may not
 3 necessarily believe it or, you know, approve it
 4 yourself, but you take what you're given, you say,
 5 "Okay, I hear what you're saying", and you pass it on to
 6 the people who do understand that for them to approve.
 7 Q. And on Grenfell, who were you passing it on to, the
 8 people who do understand it, for them to approve?
 9 A. If I had been the designer, I would have been passing it
 10 on to the architect and Building Control.
 11 Q. So does that mean you expected Kevin Lamb to be passing
 12 on this kind of information to the architect and
 13 Building Control?
 14 A. I would expect Kevin to have satisfied himself that
 15 if -- that it had been signed off by the architect and
 16 Building Control.
 17 Q. Right.
 18 Can we look at another document now from August. So
 19 the day after you were sent this pack of documents from
 20 Celotex -- that was on 27 August 2014 -- it appears that
 21 you had a discussion with them about appropriate
 22 U-values. Can we go to {CEL00001451}, and this is
 23 an extract again from the Celotex Salesforce entry, and
 24 we'll need the offline version, sorry.
 25 I want to look at the entry -- that first one on

1 that page there that we can see, it's dated
 2 28 August 2014, and it's about Grenfell Tower. Can you
 3 see it says "Related To"?
 4 A. Yes.
 5 Q. Do you see that? It's assigned to someone called
 6 Mark Willoughby, I think within Celotex, and then:
 7 "Comments: Refurb of Grenfell Tower.
 8 "0.15 U Value. Dan has calculated using FR but
 9 stated that he needs to use RS5000. 150mm.
 10 "Due on site in October.
 11 "Will re-calculate using our software instead of
 12 [Bulldesk] to make sure everything is in order."
 13 Do you see that there?
 14 A. Yes, it's Bulldesk.
 15 Q. Thank you.
 16 So focusing in on that, do you remember who you
 17 might have had a discussion with at Celotex at this
 18 time?
 19 A. I don't recall it. I recall that we used to have
 20 a piece of software in the office called Bulldesk and
 21 you could put in the products that you were using to
 22 calculate a U-value. I would have thought maybe
 23 I called Celotex to get them to check it or something.
 24 Q. But you can't recall who you spoke to at Celotex?
 25 A. No.

1 Q. Can you help us with the comment:
 2 "Dan has calculated using FR but stated that he
 3 needs to use RS5000."
 4 Do you see that there?
 5 A. Yes.
 6 Q. What's your understanding of what "FR" means there?
 7 A. My understanding now is that it was a different brand
 8 name for the same product.
 9 Q. So could it mean Dan has calculated using FR5000, but
 10 stated that he needs to use RS5000? Do you see that
 11 there?
 12 A. Yes, the software came with a set number of products in
 13 it, so it may not have had the RS5000 in it.
 14 Q. Yes.
 15 A. It just works off a figure so each product has a U-value
 16 performance or a thermal resistance, and so you just
 17 select one that has a similar thermal resistance to the
 18 one you want to roughly calculate the thickness.
 19 Q. Looking at this now, does that mean that, as at this
 20 point, August 2014, you must have been aware that it was
 21 FR5000 that had been specified as the product originally
 22 by the architects?
 23 A. I don't know. Either the product wasn't available in
 24 the software or I just had a quick look at the
 25 NBS specification and put in what was stated there.

1 Q. Can you help us: is it at this point that it was decided
 2 that the specification should change from FR to RS5000?
 3 You're recorded as stating there, "stated that he needs
 4 to use RS5000". Was that a decision that you had taken?
 5 A. No, I have no recollection of changing it or that it was
 6 even different.
 7 Q. So do you think this is inaccurate, or can you explain
 8 why it says, "stated that he needs to use RS5000"?
 9 A. I can't remember. I'd be guessing.
 10 Q. Do you know who made the decision to use the RS5000
 11 product on the Grenfell project?
 12 A. No, I can't.
 13 Q. Can you help us as to in what circumstances the RS5000
 14 came to be used on the Grenfell project?
 15 A. Only by guessing.
 16 Q. We don't want you to guess.
 17 Did you ever check with Rydon or Studio E that they
 18 were happy with the RS5000 product?
 19 A. No.
 20 Q. Whose job within Harley would it have been to have
 21 checked with Rydon and Studio E that they were happy
 22 with the RS5000 product?
 23 A. Project manager or project designer.
 24 Q. So who was that in Harley, then?
 25 A. It would have been Ben or Kevin.

1 Q. Ben or Kevin.
 2 Do you remember having a discussion with Kevin Lamb
 3 in which you talked about the RS5000 Celotex product,
 4 the new Celotex product, with Kevin Lamb?
 5 A. No.
 6 Q. So how would Kevin have been aware of that product?
 7 A. I don't know.
 8 Q. Now, if we can look forward in the chronology now, if we
 9 can go to another document, {CEL00000014}, and if we
 10 look at the bottom of page 1, at the very bottom of that
 11 page, we can see on 18 September 2014 -- so this is
 12 later in time, so three weeks or so later -- he says:
 13 "Morning Dan,
 14 "Please can you let me know your availability to
 15 discuss Grenfell Tower and the other projects in your
 16 pipeline.
 17 "Kind regards,
 18 "Jonathan."
 19 Do you see that there?
 20 A. Yes.
 21 Q. We can see from the top email on page 1 that he followed
 22 up with a further request on 17 November 2014:
 23 "Hi Dan,
 24 "Would you be around on Thursday/Friday to catch-up
 25 regarding your current/future projects?

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1 "Kind regards,
 2 "Jonathan."
 3 Do you see that there?
 4 A. Yes.
 5 Q. Do you think it's likely that you spoke to Mr Roome in
 6 between those two emails, between September
 7 and November? I think you said earlier that he was
 8 coming in on a kind of fortnightly basis. Is it likely
 9 that you had discussions with him prior to November?
 10 A. It's likely, but I can't remember.
 11 Q. Okay.
 12 We can see from the emails that a meeting did take
 13 place on 24 November 2014, because that evening Mr Roome
 14 sent you an email. If we look at that, this is at
 15 {CEL00000018}. If we could just blow up the top half of
 16 that email, thank you. This is from Jonathan Roome to
 17 you, and just note there, no one else is copied into
 18 that email, so there's no Mark Stapley, no one else at
 19 Harley, just you, "Celotex Project Review", and he says:
 20 "Hi Dan,
 21 "I spoke with Mark and the team regarding a few
 22 projects."
 23 Would that be Mark Stapley that he'd spoken to?
 24 A. I don't know, to be honest.
 25 Q. And then --

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1 A. It could have been either of them.
 2 Q. Sorry?
 3 A. It could have been either of them.
 4 Q. Yes. So Mark Harris or Mark Stapley?
 5 A. Yes.
 6 Q. And then we've got:
 7 "Grenfell Tower
 8 "When we last looked at this we came to a conclusion
 9 of using 3,000m2 of 150mm RS5000. Is this still so?
 10 "Mark's drawings were showing a mix of 100mm &
 11 160mm."
 12 Do you see that there?
 13 A. Yes.
 14 Q. So this email, would you agree, suggests that you have
 15 previously looked at the quantity and thickness of
 16 RS5000 that you would need to use for the Grenfell
 17 project?
 18 A. Yes.
 19 Q. Do you agree?
 20 A. Yes.
 21 Q. You've sat down with Mr Roome and you've talked about
 22 that?
 23 A. Yes.
 24 Q. Given what you've said about the limitations of your
 25 role, can you explain why you were having those

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1 discussions with Mr Roome?
 2 A. I think because of our relationship from previous -- his
 3 previous role, that it was just a useful way for him to
 4 be able to find out what work was coming up and what he
 5 could sort of start putting into his sales figures for
 6 predicted.
 7 Q. Because this is about the insulation, isn't it? So it
 8 can't have had anything to do with the structural
 9 performance, can it?
 10 A. No, but based on our previous relationship, we had
 11 a relationship where he could come in and talk to me,
 12 and it was a way of him being able to predict what was
 13 coming up in his sales forecasts.
 14 Q. Does that mean, on the Grenfell project, because of the
 15 relationship you had with Jonathan Roome at Celotex,
 16 that you did get involved in helping select the RS5000
 17 insulation for the project?
 18 A. No. Just helped him in anticipating what sort of
 19 projects were coming up and what sort of quantities
 20 those products might have on them if their insulation
 21 was to be used.
 22 Q. But it's much more specific than that, isn't it? You're
 23 actually looking at very specific quantities and
 24 thicknesses of a specific Celotex product for the
 25 Grenfell Tower project. Isn't that exactly what we see

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1 here?

2 A. Yes, but that's the kind of information he would be
3 looking for to understand what sort of work was
4 potentially coming up.

5 Q. So is what you're saying that you anticipated he would
6 have further discussions with somebody else at Harley
7 about whether to choose RS5000 on the Grenfell project?

8 A. As far as I understood, the RS5000 was always chosen.
9 Even looking back on it now, I come to the same
10 conclusion, that the difference between the two
11 products -- there wasn't one, and at some point someone
12 must have said, "You can't use that one, but the RS5000
13 is the equivalent".

14 Q. I see. But that does suggest that you were aware that
15 you were changing products.

16 A. Honestly, I was not aware that it was changing products.

17 Q. Okay.

18 Do you remember which drawings you had discussed and
19 looked at with Mr Roome? He says:
20 "When we last looked at this we came to a conclusion
21 of using ... Is this still so?
22 "Mark's drawings were showing a mix of ..."
23 Can you recall what drawings were reviewed by
24 Celotex?

25 A. No, Mark must have shown him some when I was working in

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1 London.

2 Q. So you can't help as to whether they showed the entire
3 wall build-up of the system at Grenfell?

4 A. No.

5 Q. We know that the Harley drawings did not themselves
6 identify the Reynobond ACM product. Do you know whether
7 Jonathan Roome was ever shown the Harley specification,
8 which did show that product, or was otherwise told that
9 it was going to be Reynobond ACM?

10 A. No, I don't.

11 Q. Did you or anyone else at Harley ever tell
12 Jonathan Roome specifically that the rainscreen you were
13 proposing to use on Grenfell was a Reynobond ACM?

14 A. Not that I'm aware of, no.

15 Q. Did you have discussions with Mr Roome about whether
16 RS5000 should be used on Grenfell Tower?

17 A. As I wasn't the designer on the project, I don't believe
18 I would have discussed it with him in direct relation to
19 Grenfell. I would have discussed it in more a general
20 sense, that it was appropriate for use over 18 metres,
21 but for any of the projects that I was working on and he
22 was putting it forward, I would have sent it off to that
23 design team.

24 Q. So you don't accept that this email suggests you did
25 have a specific discussion about the use of RS5000 for

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1 the Grenfell project?

2 A. It does discuss that it was going to be used on Grenfell
3 and he would have been aware it was going to be used on
4 Grenfell. Sorry, I'm not -- what was the question
5 specifically?

6 Q. So you're not accepting that this email suggests you did
7 have a specific discussion about the use of RS5000 for
8 the Grenfell project?

9 A. No, he would have been aware it was being used on
10 Grenfell.

11 Q. Did Mr Roome ever expressly provide you with an
12 assurance that the RS5000 product was suitable for use
13 in the specific system proposed for use at
14 Grenfell Tower?

15 A. I never discussed the specific suitability of RS5000
16 with him.

17 Q. Did, to your knowledge, Mr Roome ever conduct any
18 assessment of the cladding system at Grenfell as a whole
19 and confirm that RS5000 was safe to use in that
20 application?

21 A. Not that I'm aware of.

22 Q. Did they provide you with any detailed analysis to
23 explain why they came to the conclusion that it was
24 an acceptable use of the product?

25 A. Not that I'm aware of.

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1 Q. In Mr Bailey's evidence last week, he indicated that he
2 thought there had been an assessment by Celotex that it
3 was a suitable product for use at Grenfell. Is your
4 evidence that you weren't aware of any such assessment?

5 A. If I'd been -- I wasn't aware of it for this project.
6 On all other projects, I would have always been checking
7 that it had been done by the architect and
8 Building Control.

9 Q. Were you ever involved in promoting RS5000 for use on
10 Harley projects?

11 A. I don't believe I ever tried to promote it on any
12 projects.

13 Q. What about specifically for Grenfell Tower? Do you
14 remember ever supporting, within Harley, the use of
15 RS5000 on the Grenfell project?

16 A. No. It was a prescriptive performance, from my point of
17 view. It was already specified.

18 Q. Now, in your witness statement you've said that you
19 attended two design team meetings in August 2014
20 and October 2014. The minutes of the design team
21 meeting for August 2014 do show you there. The minutes
22 for the October 2014 meeting do not show you there, but
23 you are at the September 2014 design team meeting.
24 Is it possible that you've simply got confused about
25 that?

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1 A. It was a long time ago.
 2 Q. Yes. Let's look at the minutes of that September 2014
 3 design team meeting. It's at {RYD00017128/4}.
 4 Sorry, we probably ought to look at the front of
 5 those meeting minutes just to check that you were there
 6 {RYD00017128/1}. Yes, so you can see it's held on site
 7 on 2 September 2014 at 10.00 am, and you are there in
 8 the "Present" list on the left-hand side. Do you see
 9 that?
 10 A. Yes.
 11 Q. Together with Kevin Lamb, can you see that?
 12 A. Yes.
 13 Q. If we go to page 4 {RYD00017128/4} at item 3.62, we can
 14 see U-values being discussed. Do you see that there?
 15 A. Yes.
 16 Q. And it says:
 17 "U-values were discussed with SL ..."
 18 I think that must be Simon Lawrence; is that right?
 19 A. I presume so, yes.
 20 Q. "... with [Simon Lawrence] asking how the figures in the
 21 spec. were arrived at and whether they need to be
 22 rechecked from an M&E and insulation point of view. Is
 23 the insulation thickness show on Architect drawings,
 24 correct (sic)."
 25 Then we see this. It says:

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1 "DAJ ..."
 2 That would be you, Daniel Anketell-Jones?
 3 A. Yes.
 4 Q. "... confirmed that he had checked them but with the
 5 assumption that [Rydon Maintenance Limited] were fitting
 6 further insulation internally. [Simon Lawrence] didn't
 7 believe this was part of the spec. All parties agreed
 8 to check their documents."
 9 Do you see that there?
 10 A. Yes.
 11 Q. Does this mean that you had checked the U-values for the
 12 insulation?
 13 A. That would have been with that Builddesk software that
 14 we looked at earlier.
 15 Q. So it was part of your role, was it, to check U-values
 16 and thermal performance of the insulation?
 17 A. I don't think it was specifically part of my role. It
 18 was just trying to double-check on this particular
 19 project to help them out.
 20 Q. Did this checking process of the U-values prompt any
 21 consideration of whether the product was suitable from
 22 other perspectives, such as a fire safety perspective?
 23 A. No, it would have been just checking whether the U-value
 24 that they were trying to achieve could be achieved with
 25 the thickness of insulation that they were specifying.

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1 Q. Did you ever consider whether another insulation
 2 product, such as a mineral wool insulation product,
 3 might have been more appropriate for the Grenfell
 4 project?
 5 A. No, because it had been specified by the architect. It
 6 was a prescriptive specification. We weren't trying to
 7 put forward other products in my mind.
 8 Q. And then just finally on this set of minutes, and then
 9 I think we can break, the post-meeting note, that PMN,
 10 do you see at the bottom of that page?
 11 A. Yes.
 12 Q. It says there:
 13 "Max Fordham tender U-value document was shared to
 14 team via email. External wall construction was checked
 15 against all tender information and all information
 16 shared."
 17 Do you see that there?
 18 A. Yes.
 19 Q. Now, were you involved in that checking process for the
 20 external wall construction?
 21 A. Not that I remember.
 22 Q. So you don't recall checking that construction against
 23 the tender information?
 24 A. No.
 25 Q. Do you know whether anyone else at Harley did, as

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1 recorded in the minutes?
 2 A. No. I mean, reading this, it looks more like a check
 3 that was carried out on -- with the design team.
 4 MS GRANGE: Okay.
 5 Mr Chairman, I think that would be a good moment.
 6 SIR MARTIN MOORE-BICK: Good point?
 7 MS GRANGE: Thank you.
 8 SIR MARTIN MOORE-BICK: Well, Mr Anketell-Jones, it's time
 9 we had a break for lunch. We'll stop now and we'll
 10 start again at 2 o'clock, please.
 11 Please don't talk to anyone about your evidence or
 12 anything to do with it over the break, and we'll see you
 13 back here at 2 o'clock, please.
 14 All right, thank you.
 15 (Pause)
 16 Good. 2 o'clock, please.
 17 (1.03 pm)
 18 (The short adjournment)
 19 (2.00 pm)
 20 SIR MARTIN MOORE-BICK: Right, Mr Anketell-Jones, ready to
 21 continue?
 22 THE WITNESS: Yes.
 23 SIR MARTIN MOORE-BICK: Good, thank you very much.
 24 Yes, Ms Grange.
 25 MS GRANGE: Yes, thank you.

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1 I'm staying with the story of the insulation and
 2 your contact with Celotex.
 3 Can we turn to a document {CEL00009974}. This is
 4 from the Celotex Salesforce database, and it shows that
 5 you had what seems to be known as a contact profile
 6 within their database. Do you see that there? So it's
 7 got your name at the top. Do you see that?
 8 A. Yes.
 9 Q. And details about your job and your role below that. Do
 10 you see that there?
 11 A. Yes.
 12 Q. Were you aware that you were seen as a contact profile
 13 for Celotex at the time?
 14 A. Not as a person but as a company, I would have thought.
 15 Q. I see, yes, so Harley would, certainly in your mind,
 16 have been seen as a key contact for Celotex?
 17 A. As a contact, yes.
 18 Q. Yes.
 19 Did you ever have any role in the marketing or
 20 promotion of Celotex products?
 21 A. No.
 22 Q. Did Harley ever get involved in helping Celotex to
 23 market its range of products?
 24 A. No.
 25 Q. Now, following on in the chronology, I now want to pick

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1 up where we are in January 2015. If we can look at
 2 {CEL00000019/2}, an email that you send -- there we go,
 3 at the bottom of that page, if we zoom in on the bottom.
 4 You send this email on 16 January 2015 and the subject
 5 is headed "RS5000". It's to Jonathan Roome at Celotex.
 6 Do you see that there?
 7 A. Yes.
 8 Q. We looked at this very briefly when we first started off
 9 your evidence, but I now want to ask you some more
 10 detail about it.
 11 We can see there you say:
 12 "Good Morning Jon,
 13 "Sorry - but got a headache for you!
 14 "We are being asked by one of our clients to see the
 15 test results and certificates for the RS5000 insulation.
 16 "They want to know exactly how it was installed when
 17 tested to BS 8414-2: 2005, who carried out the testing,
 18 how it was fixed, what it was covered with, what
 19 cladding was used, what support structure, etc and most
 20 importantly the results. Drawings and or photos of the
 21 test set up would help show how it was installed, but
 22 I imagine these form part of the test results anyway.
 23 "They also want to see the certificate and results
 24 for the test to BS476 Pt7 (fire class rating), showing
 25 the index rating achieved during the test.

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1 "Could you sort this out for us please? We are
 2 hoping to put this forward on most of the cladding jobs,
 3 so having this information to hand would be most
 4 useful."
 5 Do you see that there?
 6 A. Yes.
 7 Q. The first question is in relation to what project
 8 were you enquiring about? You say there in the second
 9 line:
 10 "We are being asked by one of our clients to see the
 11 test results ... for the RS5000 ..."
 12 Can you remember what project that was?
 13 A. No. I mean, at the beginning of 2015 I started to help
 14 out more with the front end of the building -- of the
 15 company with estimating, so it was probably to do with
 16 one of those projects that was being estimated.
 17 Q. Right.
 18 Are you able to help us as to whether it might have
 19 been the Grenfell project? We know that the Grenfell
 20 project was ongoing at this time and we know that you
 21 had involvement in it. Could it have been Grenfell that
 22 you were enquiring in relation to?
 23 A. I would have thought it was more likely one of the jobs
 24 that was being estimated and trying to be won at that
 25 time.

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1 Q. When you say "one of our clients", what kind of body are
 2 we thinking of there? What does that say to you in
 3 terms of who was asking?
 4 A. Probably would have come through either a main
 5 contractor or an architect.
 6 Q. Yes.
 7 Now, if it was a different project, did you have any
 8 concerns that this or similar information was not being
 9 asked for by the professionals on the Grenfell project?
 10 A. I would have -- well, looking back on it, I would have
 11 expected that this had already been done on the Grenfell
 12 project.
 13 Q. And who would you have expected to have done that?
 14 A. The architect and Building Control.
 15 Q. So not Harley?
 16 A. No.
 17 Q. I see.
 18 A. I would imagine that this was probably to do with one of
 19 the projects which had a performance specification
 20 rather than a prescriptive specification. It was
 21 probably that we were being asked to put forward
 22 an insulation that would meet the U-value requirements.
 23 Q. We'll look at what happens, and you do get sent some
 24 information back from Mr Roome eventually, but can
 25 I just check: did you ever think at the time to refer

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1 this kind of information on to designers either in
 2 Harley or, say, Studio E at the time of the Grenfell
 3 project?
 4 A. No, because, looking back on it, I would have expected
 5 this work to have already been done. This was for a new
 6 project, I think, that that hadn't been done on yet.
 7 SIR MARTIN MOORE-BICK: Sorry, you say that this might have
 8 been somebody interested in U-values, but none of this
 9 is concerned with U-values, is it?
 10 A. No, but this is the only reason that we'd be putting
 11 forward an insulation, is because we were trying to hit
 12 a performance-related specification rather than
 13 a prescriptive one. If it was prescriptive, then it
 14 would be that this was already in that specification for
 15 that job.
 16 MS GRANGE: But this is all about fire testing, isn't it?
 17 Fire testing of the RS5000 insulation.
 18 A. Yes, so if there was a performance specification that
 19 had a high performance requirement, we would have known
 20 that the only way we could probably achieve it was with
 21 one of these high performance insulations, and so we'd
 22 have to put this forward to that client to see if they
 23 believed it was compliant or not.
 24 Q. Isn't it more likely that one of your clients had
 25 realised that it's important to know the test results

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1 and details of the testing for the BS 8414 tests that
 2 were done on RS5000?
 3 A. I think that it's basically the same thing, that we were
 4 putting forward a product to meet a performance
 5 requirement, and they'd probably come back saying that
 6 they needed to see this information to be able to
 7 approve that product.
 8 Q. Yes, isn't it likely that they looked at the RS5000
 9 information following the launch of that product and
 10 realised that they needed to know more about exactly how
 11 it was installed, what it was covered with, what
 12 cladding was used, et cetera, in order to decide whether
 13 it might be suitable for another project?
 14 A. I think we're saying the same thing, aren't we?
 15 Q. I'm not sure we are.
 16 A. I'm saying that we'd probably got a performance required
 17 specification in, we knew it was a high performance
 18 requirement, so we would have put this forward to them,
 19 and it would appear that they came back asking for
 20 additional information.
 21 SIR MARTIN MOORE-BICK: Does that mean you would have put it
 22 forward without satisfying yourself that it met the fire
 23 safety requirements?
 24 A. Again, because I wasn't educated in fire safety or had
 25 any training in it, I wouldn't have been able to do more

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1 than look over the information and pass it on to the
 2 people who did.
 3 MS GRANGE: Did you think about reading the information that
 4 Jonathan Roome had already sent you? We know you got
 5 that zip file in August 2014 with all that pack of
 6 information which would have answered some of these
 7 questions, wouldn't it, like what cladding was used,
 8 support structure, et cetera, how it was fixed? Some of
 9 that was in the pack of information that we looked at
 10 this morning, wasn't it?
 11 A. Yes, but I wouldn't have -- I wasn't trained in those
 12 areas. I wouldn't have known to look back at that
 13 because they didn't stand out to me in the same way as
 14 things like Euro codes would.
 15 Q. Why did you say in the first line:
 16 "Sorry - but got a headache for you!"
 17 Why did you consider it would be a headache for
 18 Celotex to provide this information?
 19 A. I can't remember.
 20 Q. If you didn't know this area and you didn't know even
 21 the basics about fire testing, how would you know that
 22 it would be difficult -- because that's what "headache"
 23 implies, isn't it, difficult -- for Celotex to be
 24 providing this information?
 25 A. I'd only be guessing at why I was saying that.

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1 Q. Were you aware at the time that there might be
 2 difficulties for Mr Roome in disclosing the documents?
 3 A. I think, looking back at his response to this, there
 4 must have been some sort of conversations at the time
 5 that portrayed that, but only from looking back at that.
 6 I have no memory of it.
 7 Q. If we look at what you say at the end of that first
 8 detailed paragraph, three paragraphs down, you say:
 9 "Drawings and or photos of the test set up would
 10 help show how it was installed, but I imagine these form
 11 part of the test results anyway."
 12 If you didn't know the basics about the fire
 13 testing, how could you be speculating here that you
 14 imagine that they do form part of the test results
 15 anyway?
 16 A. Probably from speaking to the person who was asking for
 17 them.
 18 Q. I see. So you're saying you've got all of this and
 19 you're merely a conduit, is that what you're saying,
 20 between the client that's asking and Celotex?
 21 A. Yes.
 22 Q. Were you aware at the time -- I want to put this to you
 23 directly -- that just because Celotex had passed one
 24 8414 test, that did not mean that it would be suitable
 25 for all rainscreen applications?

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1 A. I was aware at the time that, if it was accepted on one
 2 job, it wouldn't necessarily mean it would be accepted
 3 on another job, so it was done on a job-by-job basis,
 4 but I didn't understand what grounds that was on.
 5 Q. So you didn't understand that it was important to check
 6 the system that was proposed to be used and whether it
 7 was the same as the system that had been tested?
 8 A. No, to be honest, I thought it just came down to the
 9 particular fire consultant or Building Control officer
 10 who was reviewing the information and how they
 11 interpreted it.
 12 Q. Were you aware that the Celotex was not compliant in
 13 certain circumstances and that was why the provision of
 14 this information might be difficult for Mr Roome?
 15 A. I wasn't aware that it wasn't compliant; I was just
 16 aware that some people might not accept it.
 17 Q. So you weren't aware that, following the guidance -- the
 18 guidance in, say, paragraph 12.7 of ADB -- this product
 19 wouldn't meet the limited combustibility requirements?
 20 You weren't aware of that?
 21 A. No.
 22 Q. So can you help us as to why it would be a headache for
 23 Jonathan Roome to provide this information?
 24 A. I can only draw an assumption based on his response to
 25 this email, where he says about it being unlikely that

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1 any information would be given for parts of it. We must
 2 have had a -- well, I assume that we had a conversation
 3 along those lines at some point previously.
 4 Q. Did you anticipate that Celotex would be reluctant to
 5 disclose these documents?
 6 A. I can't remember, but by that start and the response
 7 I can guess that that must have been along those lines.
 8 Q. Would you agree that you must have known at the time
 9 that the precise details of the system tested was
 10 important, otherwise why be asking Celotex for these
 11 details?
 12 A. Because I think I was passing on information.
 13 I wouldn't have known from my own knowledge, but
 14 I probably would have been told that it was important
 15 and that was why I had to ask for it, by the client.
 16 Q. I see. So you didn't ask yourself whether or not this
 17 was important enough to trouble Celotex with before you
 18 just passed on the information?
 19 A. No, I just passed on the information.
 20 Q. I would suggest to you that, on reading this email, it
 21 does suggest that you did appreciate how important the
 22 exact details of the system that had been tested were?
 23 A. Because I was being asked by somebody who was being very
 24 specific in what they required.
 25 Q. Was it your understanding that the way in which the test

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1 was set up was critical to its reliability?
 2 A. No. Only from what was being asked here, I could have
 3 drawn that conclusion, but I didn't know it.
 4 Q. Did this request from your client cause you to
 5 reconsider the suitability of Celotex RS5000 for use on
 6 the Grenfell project?
 7 A. No, because it was my understanding that these sort of
 8 checks had already been carried out by the architect and
 9 Building Control.
 10 Q. But you had no communications, did you, from Studio E or
 11 Building Control which said those checks had been
 12 carried out?
 13 A. No, because I wasn't the designer on that project.
 14 Q. Did you know what the BS 476-7 testing was relevant to?
 15 A. No.
 16 Q. You didn't know that that might be relevant to national
 17 class 0?
 18 A. No.
 19 Q. Did you know why that additional information might be
 20 relevant to the use of an insulation product?
 21 A. No.
 22 Q. Now, finally, you say:
 23 "We are hoping to put this forward on most of the
 24 cladding jobs, so having this information to hand would
 25 be most useful."

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1 Would you agree that that suggests that you did
 2 recognise at the time how important that information was
 3 likely to be? You said it would be "most useful".
 4 A. I knew that the U-values for jobs were becoming more and
 5 more difficult to hit, and I knew that Celotex was
 6 offering a product that could be used over 18 metres and
 7 was a high-performance insulation that could meet those
 8 requirements, and for the projects that were coming up,
 9 which were, you know, showing high performance
 10 requirements, the only way to satisfy them was to use
 11 a high-performance insulation.
 12 Q. But this is nothing to do with U-values, is it? It's to
 13 do with the fire performance of this insulation product.
 14 A. Yes, but to -- the reason why it was going to be put
 15 forward on most cladding jobs was because it was able to
 16 satisfy those high performance requirements, and that on
 17 those jobs it would be the same process that we would go
 18 through on every project where you submitted the
 19 information to the design team for its approval. So if
 20 you actually had that on file, you'd be able to do it on
 21 every job.
 22 Q. Again, I would suggest to you that a more natural
 23 reading of this email is that you did appreciate that
 24 these kind of details were important to its compliance
 25 and its selection on cladding projects?

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1 A. No, I think it is that it would be useful for getting it
2 signed off on other projects.

3 Q. Now, if we scroll up, we can see that Mr Roome responds
4 on 19 January at 10.57, immediately --

5 SIR MARTIN MOORE-BICK: Ms Grange, can I just ask
6 a question?

7 MS GRANGE: Sorry, yes.

8 SIR MARTIN MOORE-BICK: You've spoken more than once about
9 recommending high-performance insulation products for
10 other projects. Did you have any training or education
11 in thermal performance or calculation of U-values and so
12 on?

13 A. No, I didn't, but I was able to carry out calculations
14 to cross-check what had been put on there, and so you
15 could quickly ascertain whether one insulation was going
16 to meet those requirements or not.

17 SIR MARTIN MOORE-BICK: But you didn't feel able to form
18 views about fire performance?

19 A. No, because one is a very simple mathematical formula;
20 the other one is a very complex set of regulations.

21 SIR MARTIN MOORE-BICK: All right. Yes, thank you.
22 Yes, Ms Grange.

23 MS GRANGE: Before I go to Mr Roome's response, just one
24 further question: why were you hoping to put RS5000
25 forward on most of your cladding jobs? To what benefit?

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1 A. For the reason I mentioned before, that the jobs that
2 had started to come in had very high performance
3 requirements from the envelope, and most of the jobs,
4 that could only be achieved using a high-performance
5 insulation, and Celotex were saying that theirs was
6 acceptable for use above 18 metres.

7 Q. But if this information was going to be a headache for
8 Mr Roome, why were you hoping to put that forward on all
9 of your cladding projects?

10 A. I think from his reply -- well, because he was saying
11 that it could be used above 18 metres, it was the only
12 one that would satisfy those U-values and be acceptable
13 for use over 18 metres.

14 Q. Right.

15 Now, if we scroll up and look now, we see his
16 response is:

17 "Morning Dan,
18 "Hope you had a good weekend.
19 "I will check regarding test reports and what we are
20 allowed to send out.
21 "I will get back to you soon."
22 Do you see that there?

23 A. Yes.

24 Q. Did it concern you that he might not be allowed to send
25 out certain test reports relevant to the fire

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1 performance of this product?

2 A. No. At that time my understanding of how test reports
3 were written and what they showed was virtually none
4 because I was a structural engineer, and so I just
5 assumed that there was some sort of privacy rules on it,
6 but the information that he would be allowed to send
7 would be enough to satisfy the consultants.

8 Q. But were you not concerned that this was relevant to
9 life safety and, therefore, if they were details that
10 you needed to see, they ought to be provided? Was that
11 not your attitude?

12 A. Yes, I thought that they would be allowed to send out
13 enough to satisfy those requirements and to give the
14 consultants enough information to be able to sign them
15 off. I wasn't worried that the stuff that he wasn't
16 allowed to send would impede that in any way.

17 Q. Right.

18 Then we see your response to that at the bottom of
19 page 1 and on to page 2, on 20 January 2015. Then if we
20 go over to the top, you say:

21 "Fingers crossed you can get this for us. I am
22 worried that if this can't be cleared up, then we will
23 have to change to rockwool duo slab as this has the
24 necessary backup to appease the 'specialists'!"
25 Do you see that there?

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1 A. Yes.

2 Q. Can you help us to understand this comment. What do you
3 mean that Rockwool Duo Slab had the necessary back-up to
4 appease the specialists?

5 A. That whatever we had submitted to the consultants had
6 been approved for the Rockwool Duo Slab.

7 Q. Did you understand that that would be about the fire
8 performance of the Rockwool Duo Slab, that it had the
9 necessary back-up to appease the specialists?

10 A. It would be either that -- it could only really be
11 the -- it could be a range of things, but it would
12 probably be the fire performance, the thermal
13 performance and whether it was suitable for behind
14 a rainscreen for its longevity and durability.

15 Q. I would suggest to you it was almost certainly about the
16 fire performance because that was the sole topic of your
17 email to Mr Roome, was fire performance.

18 A. Yes.

19 Q. So isn't it likely that the fire performance of the
20 Rockwool Duo Slab had satisfied the specialists in that
21 job, and you were needing more information from Celotex
22 to persuade them that that RS5000 product was
23 satisfactory from a fire safety perspective? Isn't that
24 what was happening?

25 A. I think that the Rockwool Duo Slab, you know, often

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1 takes up twice as much room as the high-performance
 2 insulations , and if this job had been drawn with high
 3 performance, it would have meant going back and
 4 completely changing the design.
 5 Q. Would you agree with me that a natural reading of this
 6 is that you did understand at the time that Rockwool
 7 Duo Slab had the necessary back-up in terms of fire
 8 performance to appease the specialists ?
 9 A. I wouldn't have known why they were happy with it, but
 10 I think I would have known that they were happy with it.
 11 Q. Why did you put the word "specialists" in inverted
 12 commas?
 13 A. Because I think even then I was aware of how broadly
 14 people interpreted a lot of this information and how on
 15 one job it might be accepted and on one job it might
 16 not.
 17 Q. Yes.
 18 A. And I think I found that -- being a structural engineer,
 19 it was always very black and white. There was no grey
 20 in being a structural engineer. I found it very hard to
 21 align myself with people who call themselves specialists
 22 but couldn't agree on something.
 23 Q. Who are you referring to there? Are you referring to
 24 architects or fire engineers, can you help us?
 25 A. I would say architects , fire engineers,

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1 Building Control, thermal consultants.
 2 Q. Were you sceptical of their specialisms?
 3 A. I think generally across the board I was.
 4 Q. Why? Why were you sceptical of them asking for this?
 5 A. Because you couldn't ever get the same answer twice, it
 6 felt like .
 7 Q. Yes.
 8 A. You could be working in one part of London and they'd
 9 want it done one way, and you could be working in
 10 another part of London and they'd want it done another
 11 way. I personally fail to see how that makes sense.
 12 Q. Did the specialists ever explain to you why this
 13 information was required and was necessary for them?
 14 A. I can only ... I can't remember. It would have been
 15 that they were -- they wanted to approve the product or
 16 we wanted them to approve the product. I can't remember
 17 any conversations about it .
 18 Q. Did you know that the reason this information was being
 19 asked by the specialists was because 8414 tests applied
 20 only to the system as tested?
 21 A. No, I did not know that.
 22 Q. So you didn't think that was why the specialists were
 23 seeking this information?
 24 A. I just thought that they wanted all of the information
 25 that they could get to be able to sign it off.

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1 Q. So you commented there that if the information can't be
 2 provided, Harley would have to change to Rockwool Duo
 3 Slab. That's the phrase you've used:
 4 "... then we will have to change to rockwool duo
 5 slab ..."
 6 Doesn't that suggest that you had positively
 7 suggested RS5000 and it was being queried by specialists
 8 on a project?
 9 A. I can't remember a time where we ever, you know, started
 10 the requirements. Usually the architect knew roughly
 11 what he wanted, and he'd know that he wanted
 12 a high-performance insulation or a Rockwool insulation,
 13 and then we'd go away to come back with a proposal of
 14 which one.
 15 Q. So is your evidence that it was never Harley suggesting
 16 that RS5000 was a suitable insulation product for
 17 buildings above 18 metres? Is that your evidence?
 18 A. Yes.
 19 Q. Now, we can see from the email at the top of that page
 20 {CEL00000019/1} that, on 21 January 2015, Mr Roome
 21 provided you with a number of things. He says this :
 22 "Hi Dan,
 23 "I have attached the 12 Page BS8414:2 report showing
 24 the build-up and components used. In addition I am
 25 sending you the thermocouple graphs showing the

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1 temperatures at each level of the test .
 2 "I am not able to send you the BS476 test document
 3 as this is confidential . I would be surprised if you
 4 were able to get this or any other report from the
 5 manufacturer to be honest. In lieu of this I have
 6 attached the data sheet showing confirmation of the
 7 products having BS476 part 6 & 7 which gives it its
 8 Class 0 performance in addition to the BS8414 test.
 9 "I would ask that these documents are not shared
 10 outside of the network of you and your specialist
 11 adviser for this project .
 12 "Please give me a call when you have a moment to
 13 discuss ."
 14 Do you see that?
 15 A. Yes.
 16 Q. Now, did you read those documents when you were provided
 17 with them?
 18 A. No.
 19 Q. You didn't? So you simply passed them on to the
 20 specialists on the project?
 21 A. Yes, I just -- at that point I wouldn't have known what
 22 they're about. I just don't imagine that I would have
 23 read them.
 24 Q. So that didn't prompt you to look at those documents and
 25 then consider whether the RS5000 product was suitable

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1 for use on Grenfell Tower?
 2 A. No, because, as far as I was concerned, Grenfell Tower,
 3 the insulation had already been specified and approved
 4 by the architect and Building Control.
 5 Q. Did you think that what you ought to do is send this
 6 information to other members of the Grenfell project,
 7 including Kevin Lamb, Studio E, Rydon, so that they were
 8 aware of it and could use it in making an assessment as
 9 to whether they should be using RS5000? Did you think
 10 about that?
 11 A. No, because I thought it had already been done.
 12 Q. Well, it hadn't, had it? This is January 2015.
 13 A. Yes, but as far as I was aware, the product was already
 14 specified well before I even looked at the -- the first
 15 time I saw the NBS spec, it was what was in there,
 16 I think.
 17 Q. But it's not the same product as the NBS specification,
 18 we've looked at that. The product in the
 19 NBS specification was FR5000; this is RS5000, isn't it?
 20 A. Yes.
 21 Q. So RS5000 hadn't been specified long before, had it?
 22 A. No, but it's just my recollection of it. I can't
 23 remember looking at this and having any thoughts as to
 24 whether there was any doubt by the design team as to the
 25 use of this on Grenfell. I was under the impression

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1 that it was already approved.
 2 Q. Does that mean that you kept this information to
 3 yourself within Harley? Did you share it with anybody
 4 else within Harley?
 5 A. I don't know.
 6 Q. You don't know?
 7 A. No.
 8 Q. Did it concern you that Mr Roome said he was unable to
 9 provide the BS 476 test document? We see that in the
 10 second paragraph where he says it's confidential. Did
 11 that concern you at all?
 12 A. No, I would have sent this on, and if it had been
 13 a concern for the people who understood it, I would have
 14 gone back to him.
 15 Q. When he says "confidential", what did you understand it
 16 to mean? Confidential to who?
 17 A. At the time I was under the impression that Celotex and
 18 Kingspan were sort of both competing to get a product
 19 that could be used over 18 metres, and I assumed that it
 20 was in relation to not letting them see how they were --
 21 you know, what was their special way of meeting the
 22 requirement.
 23 Q. I see. So you think Mr Roome was concerned that, what,
 24 you might pass this information on to Kingspan?
 25 A. Yes.

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1 Q. To Celotex's competitor?
 2 A. Or that they may somehow get sight of it.
 3 Q. Did you ever clarify that with him and ask him, "Well,
 4 why is this confidential, confidential to who?" Did you
 5 ever ask that?
 6 A. No. All I can remember is the conversations with him at
 7 the time about how they were the first one to get
 8 an insulation -- a high-performance insulation that
 9 could be used above 18 metres and that Kingspan didn't
 10 have one.
 11 Q. Did this, this not sharing the 476 test document with
 12 you, cause you to reconsider whether or not RS5000 ought
 13 to be used at Grenfell?
 14 A. No. I think if -- whoever I'd sent this on to,
 15 I suppose if they'd come back and said that it was
 16 an issue, it might have raised something, but I don't
 17 remember it causing any concern.
 18 Q. So are you saying when you got this email you were 100%
 19 confident that RS5000 was an appropriate insulation
 20 product to use on buildings above 18 metres?
 21 A. I wasn't educated in that to be able to draw that
 22 conclusion. I was -- I obviously sent this on to
 23 someone else to check whether it could be.
 24 Q. If you weren't educated in that, why was it you having
 25 these conversations with Mr Roome? Why was it you being

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1 the person to ask for this information?
 2 A. I think because I'd moved over to help Mark Harris out
 3 with the estimating. We were just -- it was just
 4 somebody to do it.
 5 Q. Did it concern you that at the end of the email he's
 6 asking that these documents are not shared outside the
 7 network of you and your specialist adviser for this
 8 project? Did that concern you, that you wouldn't be
 9 able to use that information for any other project where
 10 RS5000 was specified?
 11 A. No, it didn't. I thought this was just to do with the
 12 competition with Kingspan.
 13 Q. Did that not ring any alarm bells for you?
 14 A. No.
 15 Q. And can you help us as to what you then did with this
 16 information when you received it?
 17 A. I would imagine I passed it on to the client that was
 18 asking for it.
 19 Q. And that was all?
 20 A. Yes.
 21 Q. So then if we look at another email in this chain, this
 22 is {CEL00000023}, we can see at the bottom of page 1, on
 23 21 January at 9.09, you go back to Mr Roome. You say:
 24 "Morning Jon,
 25 "Thanks for this, sorry I didn't call back

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1 yesterday. We didn't finish till 6 ...
 2 "I will look through it and try and give you a call
 3 back.
 4 "Kind Regards
 5 "Dan."
 6 Do you see that there?
 7 A. Yes.
 8 Q. So that does suggest that you intended to look through
 9 these documents, not merely pass them on, doesn't it?
 10 A. No, I think, honestly, I wouldn't have been able to look
 11 through them without that training and knowledge, so it
 12 would have been to look through it just to compare
 13 whether he'd sent what had been asked for and whether
 14 I could send it on or not.
 15 Q. I see. Well, I would suggest to you that a natural
 16 reading of this is that you were intending to look
 17 through it and look at what information you'd been
 18 provided with to make at least some assessment of it.
 19 A. No, I wouldn't have been able to make an assessment.
 20 I had no training in this at all. So all I could have
 21 done is look through it and see if the information that
 22 had been asked for had been sent.
 23 Q. Do you know whether you called him back? You say,
 24 "I will ... try and give you a call back", do you
 25 remember calling him back?

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1 A. No, I don't.
 2 Q. Or anything about your conversation?
 3 A. No.
 4 Q. We've checked and we think the first order of RS5000
 5 insulation from Celotex through other suppliers like SIG
 6 is actually 25 March 2015, so after this. So it was not
 7 too late on Grenfell at this point to notify people
 8 about this information, was it, if that's right?
 9 A. As far as I was aware, that had already been, you know,
 10 signed off by the architect and Building Control on that
 11 project.
 12 Q. Okay.
 13 If we go forward in time, sticking with the
 14 insulation and Mr Roome, we've already seen that he sent
 15 you the Building Control Alliance Technical Guidance
 16 Note 18 on 8 April 2015. Can we go back to that:
 17 {CEL00003628}. So this is April 2015, Mr Roome to you:
 18 "Hi Dan,
 19 "Thanks for your time today to get an update on
 20 projects and family.
 21 "Let me know when you have time to go through the
 22 specs for Premier House.
 23 "I have attached the Building Control Guidance notes
 24 for insulation products above 18m which seem to be doing
 25 the rounds at the moment.

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1 "If you do find that you are entering into
 2 conversations regarding this subject please let me know
 3 what is being said, and by whom."
 4 Do you see that there?
 5 A. Yes.
 6 Q. And it would appear that this again followed a call with
 7 him, because he says:
 8 "Thanks for your time today to get an update ..."
 9 Or maybe you saw him in person. Can you recall how
 10 you'd had contact with him at that point?
 11 A. No, I can't.
 12 Q. Did you discuss Technical Guidance Note 18 with him in
 13 that conversation, do you think?
 14 A. I don't think so.
 15 Q. You don't think so.
 16 I think you told us yesterday that you didn't read
 17 that Technical Guidance Note 18; is that right?
 18 A. No, I wasn't familiar with it.
 19 Q. He says, we've just seen:
 20 "If you do find that you are entering into
 21 conversations regarding this subject please let me know
 22 what is being said, and by whom."
 23 Would you agree that, reading that, he appears to be
 24 expecting that you might be entering into conversations
 25 about the subject? Do you see that?

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1 A. Yes.
 2 Q. And is it possible that that's because that guidance
 3 made it clear that if the insulation wasn't limited
 4 combustibility, it shouldn't be used unless it followed
 5 alternative compliance routes?
 6 A. That's a conclusion that you could draw now, but at the
 7 time I didn't understand or hadn't been trained in that,
 8 to understand that.
 9 Q. Were you aware that there was something in that
 10 technical guidance note that Mr Roome was unhappy with?
 11 A. No.
 12 Q. So why would he be saying to you:
 13 "If ... you are entering into conversations
 14 regarding this subject please let me know what is being
 15 said, and by whom."
 16 Why was he so keen to know what was being said about
 17 that technical guidance note and by whom?
 18 A. I would only be guessing, I'm afraid. I don't know
 19 whether it would be something that he was positive
 20 within that Building Control guidance note or something
 21 that he was negative about in it.
 22 Q. Did you ever inform him about conversations you were
 23 aware of regarding this subject?
 24 A. Not that I'm aware of.
 25 Q. It would appear from his email that the documentation

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1 was "doing the rounds", he says, "seem to be doing the
2 rounds at the moment".
3 Just to be clear, had you received that guidance
4 document or heard about it from anybody else?
5 A. No, I think that it may well have been doing the rounds
6 for people who were trained in that way and had
7 an understanding of fire performance, but I certainly
8 hadn't been aware of it doing the rounds.
9 Q. Was there a continuing relationship between Mr Roome and
10 Harley after this time?
11 A. I believe so, yes.
12 Q. Between you and Mr Roome?
13 A. I believe he kept coming into the office. Yeah, I don't
14 remember it changing.
15 Q. Was it the case that, due to your relationship with
16 Mr Roome, Harley promoted Celotex RS5000 as
17 an appropriate product for use on Grenfell Tower?
18 A. No. I think it was my understanding that Celotex had
19 already been specified on the project.
20 Q. Was Harley proposing Celotex RS5000 on a number of other
21 projects at this time?
22 A. I don't think we were proposing it on a number of
23 projects; I think that a number of projects had
24 high-performance insulations on them, and we were trying
25 to find products that could meet those requirements.

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1 Q. Did Harley ever receive any financial incentive to
2 promote or propose RS5000 for its projects?
3 A. I wouldn't have known or been involved in those kind of
4 conversations.
5 Q. Or any other form of incentive to be promoting Celotex?
6 A. No.
7 Q. Can we go then to another email, this is {CEL00008582}.
8 This is an email in relation to a different project, and
9 it's going back in time, actually, to July 2013, from
10 Mr Roome to you. It's about "Isis House Firebreak
11 Visit", do you see that there?
12 A. Yes.
13 Q. He says:
14 "Dan,
15 "I hope you have had a lovely weekend.
16 "I have asked one of my colleagues to get in touch.
17 "I forgot to ask. Who is our competition on the
18 resin and rods for ISIS."
19 Do you see that?
20 A. Yes.
21 Q. What's he referring to there?
22 A. That's a project called Isis House.
23 Q. At the end of that, he says:
24 "Once I have the competitor info I can review with
25 my boss and raise a credit for the price difference that

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1 we settle upon."
2 Do you see that there?
3 A. Yes.
4 Q. What's he referring to there?
5 A. We were buying resin and rods for that project, and he
6 was offering to match their price.
7 Q. Yes. And Harley would receive that credit, is that
8 right, if you went with Celotex for those products?
9 A. No, this is not Celotex.
10 Q. Oh, I beg your pardon, you're right. This is when he is
11 with Hilti; is that correct?
12 A. That's correct.
13 Q. Sorry, I should correct that. This is when
14 Jonathan Roome is at the Hilti company.
15 While we're in this email, can we look at the email
16 below that dated 12 July 2013 at 16.37 at the bottom of
17 this page. So this is your email to him about
18 Isis House firebreak visit. You say:
19 "Jon,
20 "Taff (Mark Osborne) ...
21 "Needs some help on site with the installation of
22 firebreaks to make sure it's being done right, and
23 discuss and resolve any problems he may be having."
24 Can you just help as to why -- is that Osborne Berry
25 you're referring to there?

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1 A. Yes.
2 Q. Can you help as to why they were needing help from
3 Mr Roome, when he was at Hilti, with the installation of
4 firebreaks on Isis House?
5 A. I think it would be -- it was always normal to get the
6 supplier to visit site and check that the installation
7 was being done correctly.
8 Q. I see. Had you often asked Mr Roome for help with
9 installation on site?
10 A. With structural issues, I had asked him for site testing
11 of fixings. I don't think he was necessarily the
12 specialist for firebreaks. I think that there was
13 somebody else in the business who would have been sent
14 out for that.
15 Q. Okay.
16 Can we now turn to the SIG quotation for the Celotex
17 RS5000 for the Grenfell project. This is {CEL00000035}.
18 So this is SIG. Can you just tell us who SIG were?
19 A. I only know them now, to be honest. I wasn't involved
20 in ...
21 Q. They're suppliers of insulation, aren't they?
22 A. Yes.
23 Q. We can see this is a quote from SIG for the attention of
24 Ben Bailey, and it's dated 17 March 2015. Do you see
25 that there?

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1 A. Yes.
 2 Q. What we can see when we look down this invoice is that
 3 there appears to be a discount of 47.5% in relation to
 4 the Celotex product. The product is Celotex RS5000
 5 specials, quantity: 660, price: £132.19 "per each",
 6 discount: 47.5. Do you see that there?
 7 A. Yes.
 8 Q. Would you agree that that was a hefty discount?
 9 A. I wouldn't be able to comment on it because I wasn't
 10 buying those products. I wouldn't know if that was
 11 normal or abnormal.
 12 Q. So is this your evidence: you weren't aware that, on the
 13 Grenfell project, you were getting a 47.5% discount on
 14 the Celotex RS5000 insulation? You weren't aware of
 15 that?
 16 A. No, no, I was not.
 17 Q. Were you aware you were getting any form of discount?
 18 A. No.
 19 Q. So can you help us as to whether this discount came from
 20 Celotex through SIG and on to Harley?
 21 A. I wouldn't be able to help you with that.
 22 Q. Well, we can ask Mr Bailey about that.
 23 What I want to put to you is: was this a reason for
 24 promoting the RS5000 product over other options at
 25 Grenfell, because you would receive a very significant

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1 discount?
 2 A. No. I wasn't aware of it. The only reasons that RS5000
 3 would have been put forward on any project were that we
 4 were being told it was appropriate for use above
 5 18 metres, and it was one of the few insulations that
 6 was capable of achieving the high performance
 7 requirements, and then that would have always been sent
 8 to the architect and Building Control for approval.
 9 Q. Did you get any discounts on other projects from Celotex
 10 for RS5000?
 11 A. I had no involvement with discounting with Celotex
 12 products.
 13 Q. So you weren't aware whether there were any other
 14 discounts?
 15 A. No.
 16 Q. Did you ever get similar discounts from any other
 17 insulation manufacturers on other projects, for example
 18 Rockwool?
 19 A. No, I wouldn't be aware of them if there were.
 20 Q. We're still sticking with the insulation. I now want to
 21 ask you about a request for information in
 22 September 2014, and I'm just going to follow through how
 23 this came about.
 24 If we can turn to {HAR00003638}. This is an email
 25 chain from September 2014. I want to start at the

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1 bottom of this chain at the bottom of page 4
 2 {HAR00003638/4}. It begins with you there,
 3 17 September 2014, sending Simon Lawrence of Rydon,
 4 Simon O'Connor of Rydon, Neil Crawford of Studio E and
 5 Bruce Sounes an email about "Grenfell Tower Cavity Fire
 6 Barriers". Do you see that there?
 7 A. Yes.
 8 Q. You say:
 9 "Please find attached RFI001 which relates to the
 10 requirement of firebreaks. This may be something that
 11 has already been decided, or may need confirmation from
 12 the local fire officer, as the opinion tends to vary."
 13 Do you see that there?
 14 A. Yes.
 15 Q. So in this email you seem to be having some knowledge of
 16 what the local fire officer's opinion might be and
 17 variation in the local fire officers' opinion. Do you
 18 agree?
 19 A. I think this goes back to my previous statement that
 20 even the people in authority did not fully understand
 21 the requirements and it would just vary from place to
 22 place. I'm not stating that I know what that particular
 23 fire officer is going to want.
 24 Q. Okay.
 25 A. It's because of that lack of clarity that we ask that

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1 question.
 2 Q. Now, if we turn to that RFI document which was attached
 3 to the email, this is at {EX000001291}, we can see that
 4 this is a request for information form. It's a Harley
 5 form. It's to Simon Lawrence at Rydon and it's from you
 6 at Harley. Do you see that there?
 7 A. Yes.
 8 Q. 17 September 2014, and you require an answer by
 9 26 September 2014. We can see that the query:
 10 "Please may you confirm the required extent of the
 11 horizontal firebreaks within the cladding areas?"
 12 Do you see that there?
 13 A. Yes.
 14 Q. And then you've put:
 15 "Suggested Solution:
 16 "We believe that they will be required at every
 17 floor level on the vertical columns, but not in the area
 18 of cladding between windows. This is because there is
 19 no 'chimney' effect here, and therefore the cladding
 20 will not add to the spread of fire."
 21 Do you see that?
 22 A. Yes.
 23 Q. Now, did you draft that? Did you put that document
 24 together?
 25 A. Yeah, I drafted that.

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1 Q. So do you agree that this suggests that you are
 2 professing to have some knowledge or expertise in where
 3 fire barriers are required and whether or not there's
 4 going to be a chimney effect in certain parts of the
 5 cladding relevant to the spread of fire? Do you agree?
 6 A. I think that I didn't fully understand it at that point,
 7 and I think I was just being asked to send an RFI,
 8 I can't remember by who, but I was asked to send an RFI,
 9 because I wouldn't have had enough knowledge to be able
 10 to put that together.
 11 Q. So you're suggesting that this detail, these words, were
 12 not your own; is that right?
 13 A. Yes.
 14 Q. That somebody else asked you to send that?
 15 A. Yes.
 16 Q. And who could that have been?
 17 A. It could have been Mark, it could have been Ray, it
 18 could have been Kevin.
 19 Q. Right, and the part about:
 20 "This is because there is no 'chimney' effect here,
 21 and therefore the cladding will not add ..."
 22 That was not your opinion, is that what you're
 23 saying?
 24 A. At that time I knew that you were trying to stop the
 25 unseen spread of fire, but I didn't really know --

1 Q. I suggest --
 2 A. -- about it.
 3 Q. Sorry.
 4 A. I didn't know much about it.
 5 Q. I suggest to you that this does indicate you were
 6 expressing an opinion about the spread of fire and what
 7 was required in terms of fire spread in the external
 8 cladding.
 9 A. I disagree.
 10 Q. Do you know what analysis had been done to get to this
 11 view?
 12 A. No, because I didn't know about where firebreaks were
 13 really required.
 14 Q. Now, if we return to the email chain, if we go back to
 15 {HAR00003638/4} at the top of the page, we can see that
 16 on 18 September, Neil Crawford of Studio E sends that on
 17 to Terry Ashton at Exova. Do you see that there?
 18 A. Yes.
 19 Q. He says:
 20 "Hi Terry
 21 "I am working on the Grenfell Tower regeneration
 22 project from the Studio E end. The following RFI has
 23 come in relating to horizontal firebreaks within the
 24 cladding areas.
 25 "Can you comment on the RFI attached and whether you

1 believe this interpretation in relation to stack effect
 2 is correct?
 3 "Regards
 4 "Neil."
 5 Do you see that there?
 6 A. Yes.
 7 Q. At the bottom of page 3 {HAR00003638/3}, we can see that
 8 Mr Ashton responds with this, he says:
 9 "Neil
 10 "I've never seen details of what you're doing to the
 11 external walls. Do you have any cross
 12 sections/elevations?
 13 "Kind regards
 14 "Terry."
 15 Do you see that there?
 16 A. Yes.
 17 Q. I think we'll see that you get copied in to this chain
 18 later.
 19 Did it concern you that the fire safety consultant
 20 hadn't seen any details of the proposed works to the
 21 external walls?
 22 A. I wasn't aware of it at that time. I don't think
 23 I would have read down the whole email chain. If I got
 24 copied back in it later on, I would have read the
 25 response.

1 Q. I see. So you didn't think at the time that you ought
 2 to send some details as a matter of urgency to the fire
 3 engineer on the project?
 4 A. On all other projects the -- you usually send the
 5 information to the main contractor and they send it out
 6 to the consultant or the architect.
 7 Q. Now, after Exova were provided with some Harley plans,
 8 Mr Ashton then replies on 18 September 2014, so the same
 9 day, at 15.32. If we go to the bottom of page 2
 10 {HAR00003638/2} and the top of page 3 -- so if we look
 11 at the very bottom, there's an email, we can just see
 12 the start of it, from Terry Ashton, 18 September 15.32
 13 from Terry Ashton. If we go over the page
 14 {HAR00003638/3} -- it's to Neil Crawford -- he says:
 15 "Neil
 16 "If the insulation in the cavities behind the
 17 rainscreen cladding is combustible you will need to
 18 provide cavity barrier as shown on your drawing (number
 19 1279 (06) 120) in order to prevent fire from spreading
 20 from one flat to the one above even if there isn't
 21 a continuous cavity from the top to the bottom of the
 22 building.
 23 "Kind regards
 24 "Terry."
 25 Do you see that there?

1 A. Yes.
 2 Q. Then if we go one page up to the bottom of page 2
 3 {HAR00003638/2}, we can see Neil Crawford sends you that
 4 email chain. Neil Crawford to Daniel Anketell-Jones,
 5 18 September, 15.50:
 6 "Daniel
 7 "Please see correspondence relating to RFI001/Cavity
 8 Barrier requirement below.
 9 "Regards
 10 "Neil."
 11 Do you see that there?
 12 A. Yes.
 13 Q. So he's pointing you to that correspondence.
 14 A. Yes.
 15 Q. Are you saying now that you didn't read down those
 16 emails and have a look at what the debate was?
 17 A. No, I would have looked at his response but not gone any
 18 further. I can't remember going any further.
 19 Q. Mr Ashton said {HAR00003638/3}:
 20 "If the insulation in the cavities behind the
 21 rainscreen cladding is combustible you will need to
 22 provide cavity barrier as shown on your drawing ..."
 23 What was your reaction to that advice, do you
 24 remember?
 25 A. No, I don't remember.

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1 Q. Do you remember whether you agreed with it or whether
 2 you had any concerns with it?
 3 A. No, I wasn't able to make a judgement.
 4 Q. Okay. So you didn't ever query why Mr Ashton appeared
 5 to be linking the combustibility of the insulation to
 6 the requirement for cavity barriers? That wasn't
 7 something that you ever queried?
 8 A. Not that I can remember.
 9 Q. Did you think about what guidance Mr Ashton might be
 10 referring to when he gave this advice?
 11 A. The Building Regulations I would have assumed at that
 12 point.
 13 Q. But you didn't check at that point and look at, say,
 14 Approved Document B to see what he might have been
 15 referring to?
 16 A. No, because we would always refer back to them for the
 17 guidance and follow what they told us.
 18 Q. Now, this advice -- if we go up the chain to your email
 19 immediately above back to Neil Crawford {HAR00003638/1},
 20 you say, Daniel Anketell-Jones, 18 September, same day,
 21 16.03 to Neil Crawford, ccing Simon Lawrence and others
 22 at Rydon:
 23 "Neil,
 24 "Thank you for your response.
 25 "The insulation is class 0. Therefore after reading

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1 the correspondence below; I believe that the fire
 2 barrier in these locations, will not be necessary.
 3 "Can you confirm that this is acceptable?"
 4 Do you see that there?
 5 A. Yes.
 6 Q. Now, I'm going to ask you some questions about that, but
 7 I just want to show you another version of that email so
 8 I can make good the point that, actually, when you sent
 9 that email -- here we're seeing it in a chain, but when
 10 you sent it, you also attached the Celotex RS5000
 11 datasheet. So if we can pull that up now. So this is
 12 at {HAR00012103}.
 13 So this is a Harley version of that email, and we
 14 can see at the top of that page that here we can see
 15 there was an attachment, "Rainscreen cladding product
 16 datasheet aug14.pdf". Do you see that at the top?
 17 A. Yes.
 18 Q. So it's the same email, but we can see here that there
 19 was the attachment. I just want to pull up the
 20 attachment. It's {HAR00012104}, so it's the next
 21 document in the Harley run of docs. This is the RS5000
 22 Celotex datasheet. Do you see that?
 23 A. Yes.
 24 Q. Now, was this the first time that you provided Studio E
 25 and Rydon with any indication that the insulation was

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1 going to be RS5000?
 2 A. I honestly don't know.
 3 Q. You don't know?
 4 A. I would have assumed that they were completely aware of
 5 what was going to be on there and, you know, at that
 6 point I believed that they were the same product that
 7 was in the NBS specification.
 8 Q. If you thought it was the same product as in the
 9 NBS specification, why were you attaching this RS5000
 10 datasheet for them to see? Why were you telling them
 11 what the product was?
 12 A. I would always do that on all projects, would be to send
 13 them the actual datasheets.
 14 Q. Can we go back to the email again and look at it,
 15 {HAR00012103}. You say:
 16 "The insulation is class 0. Therefore after reading
 17 the correspondence below; I believe that the fire
 18 barrier in these locations, will not be necessary."
 19 Do you see that there?
 20 A. Yes.
 21 Q. So do you agree that you are giving advice in this email
 22 about what your opinion is of the fire classification of
 23 the insulation and whether that means that fire barriers
 24 are necessary in certain locations? Do you agree?
 25 A. No, I disagree. I think that this shows that I didn't

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1 understand the fire classifications , that I didn't know
 2 where fire barriers were required and that I believed
 3 that it was up to the consultants to tell us where they
 4 needed to go.
 5 Q. If that's right, why didn't you just respond saying,
 6 "I can't help you, I don't know about fire
 7 classifications , you need to direct your question to the
 8 fire consultant or Studio E"?
 9 A. But this is me asking them a question to start with,
 10 they've come back with another answer, and I'm asking
 11 them if my interpretation of their answer is correct.
 12 Q. No, what's happened is Mr Ashton has come back and
 13 queried whether the insulation is combustible, and said
 14 if it is combustible you'll need to do certain things.
 15 You've been asked for your response to that, and you
 16 have said:
 17 "The insulation is class 0. Therefore after reading
 18 the correspondence below; I believe that the fire
 19 barrier in these locations, will not be necessary."
 20 I'm going to put it to you that this is you offering
 21 your opinion on fire performance.
 22 A. No, this is me asking if my interpretation of what
 23 they've said is correct. They've come back and said
 24 that it's -- "If it's combustible, you have to do (a)",
 25 and I've gone back said, "Well, it's class 0, so does

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1 that mean we can do (b)?"
 2 SIR MARTIN MOORE-BICK: Well, it goes a bit further than
 3 that, doesn't it, because you do seem to be venturing
 4 an opinion of your own on the basis that --
 5 A. Yeah, based on what he's replied.
 6 SIR MARTIN MOORE-BICK: All right.
 7 A. Then it's clearly stated at the bottom that I'm asking
 8 whether that's right.
 9 SIR MARTIN MOORE-BICK: It would seem to reflect your view
 10 of what's meant by class 0; would that be fair?
 11 A. Yes, at that time I wasn't trained in fire at all and he
 12 sent back something about -- that it was -- about what
 13 happens if it's combustible or not combustible. I've
 14 gone and looked at the sheet and seen that it's class 0,
 15 so I've sent it back to him asking if the interpretation
 16 is correct.
 17 SIR MARTIN MOORE-BICK: Okay, yes.
 18 MS GRANGE: Why did you think it was relevant to tell people
 19 that the insulation was class 0? What did you think the
 20 relevance of that was?
 21 A. At that time, as I said before, I wasn't trained or
 22 taught about fire classifications . I'd looked at the
 23 sheet and that was the only thing that I'd seen on
 24 there, so I sent it back to him.
 25 Q. I see. Was that the only check you carried out, to look

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1 at the datasheet before you responded?
 2 A. Yes, that was -- at that point in my career, that was
 3 all I would have known to --
 4 Q. You didn't check with anybody else or check any other
 5 guidance before you responded?
 6 A. No. I wouldn't have known what else to look for at all .
 7 I was a structural engineer at that point.
 8 Q. If we go back to the long email chain, {HAR00003638} --
 9 sorry, it's not that one. I think what we see is there
 10 was another request for you to confirm -- that's right,
 11 sorry, it was in Mr Ashton's -- yes, go back to that,
 12 {HAR00003638}, and we look at Mr Ashton's reply that you
 13 were being asked to comment on. So it's the bottom of
 14 page 2 and on to the top of page 3. If we can go to
 15 page 3 {HAR00003638/3}, he says:
 16 "If ... [it's] combustible you will need to provide
 17 ... even if there isn't a continuous cavity from the top
 18 to the bottom of the building."
 19 Did you ever confirm whether there was a continuous
 20 cavity from the top to the bottom of the building?
 21 A. No.
 22 Q. Did you ever go back to Mr Ashton or Mr Crawford about
 23 the extent of the external wall cavity?
 24 A. No, I think in this email chain it's only talking about
 25 the parts between the windows, so I don't think that

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1 part had been discussed yet.
 2 Q. Do you agree with me that more relevant questions about
 3 the insulation were whether the insulation was of
 4 limited combustibility or whether the system had been
 5 tested to BR 135 and 8414? Wasn't that where the debate
 6 should have gone?
 7 A. Looking back on it now with that knowledge about fire
 8 performance of products and testing of products, yes,
 9 but at that point I had no training in that respect,
 10 which is why I always referred it on to fire engineers.
 11 Q. If we now turn on and we look at a further development
 12 on this chain, {HAR00003638/1}, what we see here is in
 13 the top email Mr Crawford is emailing Terry Ashton and
 14 ccing you. Again, this is all happening on
 15 18 September 2014, on the same day. This is now at
 16 17.11. He says:
 17 "Hi Terry
 18 "Thank you.
 19 "Daniel,
 20 "Can you confirm your position in relation to
 21 Terry's comment below regarding combustibility and
 22 continuous cavity paths. Having just finished several
 23 weeks of fire stopping checks on the Kensington Aldridge
 24 Academy where John Hoban crawled into almost every
 25 conceivable cavity possible with a torch (including

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1 nearly falling through a suspended ceiling!) we need to
 2 be clear on our position before going to
 3 building control.
 4 "Regards
 5 "Neil."
 6 Would you agree that, even though you're only cc-ed
 7 in to that, there's a part of that email from
 8 Mr Crawford that's directly addressed to you? Do you
 9 see that?
 10 A. Yes, I can see that.
 11 Q. If we look down at what Terry Ashton said below that, he
 12 said this:
 13 "Neil
 14 "A material which has a Class 0 rating is not
 15 necessarily non-combustible although the reverse is
 16 invariably true. Some Class 0 products will burn when
 17 exposed to a fully developed fire. In any case, you
 18 need to prevent fire spread from [one] flat to the flat
 19 above as I stated in my earlier email. What isn't clear
 20 from the information to hand is whether or not there is
 21 a continuous cavity from top to bottom in any part of
 22 the cladding (apart from around the column casings)
 23 irrespective of the type of insulation."
 24 Do you see that there?
 25 A. Yes.

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1 Q. So that's the advice Terry Ashton was giving and you're
 2 sent that. Can you recall, what was your reaction to
 3 that?
 4 A. I can't recall. I believe from seeing information later
 5 on that we put in cavity barriers at every floor level,
 6 so we must have taken on board what he was saying.
 7 Q. But what was your reaction in terms of what he's saying
 8 about the insulation? Because what he's saying there
 9 is:
 10 "A material which has a Class 0 rating is not
 11 necessarily non-combustible ... Some Class 0 products
 12 will burn when exposed to a fully developed fire."
 13 Isn't that potentially warning you that class 0 is
 14 not enough?
 15 A. Honestly, at that point I didn't understand the
 16 difference, and if I'd read this, I can't remember what
 17 I would have thought.
 18 Q. Well, we know you're sent it and you're specifically
 19 asked some questions about it by Mr Crawford. Did this
 20 email cause you any concern about your statement that
 21 the insulation was class 0?
 22 A. I can't remember.
 23 Q. Do you know whether it in any way caused you to
 24 reconsider the assessment of whether Celotex RS5000 was
 25 suitable for Grenfell Tower?

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1 A. I was under the impression that the Celotex product had
 2 been already approved by the architect and
 3 Building Control officer and the fire engineer, so it
 4 wouldn't have occurred to me to question them.
 5 Q. I see. So even though the fire engineer is coming back
 6 and saying to you, "Class 0, you've got to be careful
 7 around class 0" -- that's me paraphrasing what he's said
 8 in the first couple of lines -- you're saying that
 9 didn't prompt any reconsideration in your mind about
 10 whether or not to use RS5000 for the Grenfell project?
 11 A. No, because I thought that all those people had already
 12 approved the product.
 13 Q. Did you ever raise the combustibility of the insulation
 14 with anyone at Rydon, Exova or Studio E? Did you ever
 15 independently raise that question with them?
 16 A. No.
 17 Q. And can you remember ever going back about your position
 18 in relation to Terry's comment below about
 19 combustibility and continuous cavity paths? If we go
 20 back to the email at the top, Neil Crawford is asking
 21 you to confirm your position:
 22 "Can you confirm your position in relation to
 23 Terry's comment below regarding combustibility and
 24 continuous cavity paths."
 25 We can't find any response. Do you know if you ever

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1 did respond to that email?
 2 A. I can't remember.
 3 Q. You can't remember what advice you gave at that point?
 4 A. No.
 5 Q. Did you ever take any steps after this to investigate
 6 further whether the RS5000 product was compliant?
 7 A. No, because, as far as I was concerned, it had already
 8 been checked for compliance by people who understood it
 9 far better than I did.
 10 Q. Did you speak to Celotex again to get any more
 11 information and to raise with them the fact that class 0
 12 might not be the entire answer to whether it could be
 13 used at Grenfell?
 14 A. No, because this didn't jump out at me at that time,
 15 I have no memory of it.
 16 Q. Now, I want to put it to you directly before we move on
 17 from this topic that, if you look at the emails as we've
 18 done today between you and Mr Roome in August 2014 when
 19 you're discussing the quantity of RS5000 to use on the
 20 Grenfell project, and you also put it together with this
 21 email chain a month later in September where you forward
 22 the RS5000 datasheet and you say the insulation is
 23 class 0, I want to put it to you directly: do you accept
 24 that it appears to have been you as the person within
 25 Harley who took the decision to use RS5000 on the

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1 Grenfell project?
 2 A. No. It was decided long before I was involved. I never
 3 put the product forward, never selected it, never made
 4 any decision about using it on the project.
 5 Q. So can you help us as to who within Harley did authorise
 6 the use of RS5000, from Harley's own perspective?
 7 A. I don't know.
 8 MS GRANGE: Okay.
 9 Mr Chairman, I think that would be a good moment for
 10 a break because I want to move on to another topic, and
 11 I would just like five minutes to review my questions.
 12 SIR MARTIN MOORE-BICK: Yes. Let's have a break there,
 13 then.
 14 We'll have a short break now, Mr Anketell-Jones.
 15 We'll come back at 3.30, and then that will give you
 16 a little bit more time to organise your questions.
 17 MS GRANGE: Yes, thank you.
 18 SIR MARTIN MOORE-BICK: No talking to anyone about your
 19 evidence, please, while you're out of the room. So if
 20 you would like to go with the usher, she'll look after
 21 you. Thank you.
 22 (Pause)
 23 3.30, then, please.
 24 (3.14 pm)
 25 (A short break)

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1 (3.30 pm)
 2 SIR MARTIN MOORE-BICK: All right. Ready to carry on?
 3 THE WITNESS: Yes.
 4 SIR MARTIN MOORE-BICK: Good, thank you.
 5 Yes, Ms Grange.
 6 MS GRANGE: Yes, just to pick up one discrete topic that
 7 arose yesterday, which was about CVs. Do you remember
 8 we looked at your CV that Rydon had put forward as part
 9 of its tender proposals?
 10 A. Yes.
 11 Q. You said yesterday that there were certain parts of that
 12 CV that weren't accurate, like your involvement in the
 13 Chalcots Estate. Do you remember that?
 14 A. Yes.
 15 Q. And you said that that CV was produced without your
 16 knowledge or consent.
 17 Can we just look at a document relevant to this
 18 story. This is at {RYD00002798}. So this is
 19 an email -- you're not copied in here -- from
 20 Mark Harris to Simon Lawrence on 6 February 2014, and
 21 it's cc'ing Mike Albiston and Katie Bachellier there.
 22 It's about CVs. It says:
 23 "Morning Simon
 24 "Please find attached CV summary's(sic) of three
 25 members of the Harley design and delivery team. There

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1 will also be a project specific site manager, but at
 2 this stage, I could not confirm a name.
 3 "I have purposely kept each CV to a single page, but
 4 can elaborate on experience and qualifications for each
 5 individual if so desired?
 6 "Alternatively, I can send a full CV for each."
 7 Can you see that?
 8 A. Yes.
 9 Q. Then we can see that the CVs that were sent were for
 10 you, Mark Stapley and Rob Maxwell, and those are the
 11 three CVs we see in the Rydon tender package.
 12 Now, we've checked those CVs that are sent there by
 13 Mark Harris, and they are identical to the ones we
 14 showed you yesterday in the Rydon tender, including your
 15 CV.
 16 Now, what I want to ask you -- I appreciate you're
 17 not involved in this here -- did Mark Harris check with
 18 you whether your CV was accurate before it was sent?
 19 A. Not that I have any recollection of, no.
 20 Q. Do you remember having a chance to review the CV before
 21 it was sent out?
 22 A. I didn't even know it had been sent out.
 23 Q. Can you help us as to how Mark Harris might have sent
 24 a CV relating to you that had inaccuracies?
 25 A. No, you'd have to ask him.

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1 Q. Okay.
 2 I now want to turn to a bit of a more detailed look
 3 at exactly how the design process worked on the Grenfell
 4 project, and in due course I'm going to take you to look
 5 at the process for approving drawings on the Grenfell
 6 project, so that's this topic.
 7 Just to kick that off, were you aware that there
 8 were any regular design reviews carried out during the
 9 Grenfell project, either formal design reviews or
 10 informal design reviews, that happened with Kevin Lamb?
 11 A. I would have expected that he would have been sending
 12 the drawings to the architect and design team for their
 13 review.
 14 Q. But did Harley have any kind of processes in place to,
 15 if you like, kind of draw a line in the sand and take
 16 stock of where the design had got to and review the
 17 design as it went through, or was Kevin Lamb just left
 18 to get on with dealing with the drawings and sending
 19 those to Rydon and Studio E as appropriate?
 20 A. He was left to do the work, yes.
 21 Q. Did you personally check the drawings that were being
 22 produced by Kevin Lamb?
 23 A. No.
 24 Q. You didn't. You don't have any memory of doing that?
 25 A. No, I have a memory of passing some on to the managing

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1 director for him to check, but I was working on another
 2 project.
 3 Q. Okay. We will look at some emails relevant to that in
 4 a moment.
 5 Do you accept that you were regularly copied in to
 6 emails on the project?
 7 A. From what I've been shown, yes.
 8 Q. Yes. So even after Mr Lamb's appointment, you were
 9 regularly copied in to emails about the project; yes?
 10 A. Yeah, for a period.
 11 Q. When you say "for a period", what do you mean by that?
 12 A. At some point I became completely uninvolved with the
 13 project. I can't remember when it was, but I think that
 14 at some point I stopped receiving emails on the project.
 15 Q. Can we just look at something that Mr Albiston has said
 16 in his witness statement about your role. If we look at
 17 {HAR00010151/3} at paragraph 9, I want to pick up -- so
 18 this is Mr Albiston's witness statement. Three lines
 19 down, he says this:
 20 "The specification was also reviewed by Daniel
 21 Anketell-Jones (Harley). Daniel Anketell-Jones would
 22 have been looking at the tender documents from a more
 23 technical and design point of view. For example he
 24 would be looking to see that the materials specified
 25 were suitable for that job."

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1 Do you see that there?
 2 A. Yes.
 3 Q. I wanted to give you the chance to respond to what
 4 Mr Albiston said there about your role. Do you agree
 5 with his description?
 6 A. No, I think that again it's a -- there's confusion in
 7 timeframes, because at this point I hadn't -- I wasn't
 8 educated enough or hadn't done enough of the MSc to be
 9 able to be responsible for those sorts of things.
 10 Q. I just want to look at some exchanges between you and
 11 Mr Lamb. To start with, the witness statement of
 12 Kevin Lamb, this is {HAR00010419/5}, and I want to look
 13 at paragraph 22. So if we look down there, he's talking
 14 about some Studio E drawings forming the basis of his
 15 design, "along with discussions with both Daniel
 16 Anketell-Jones and Ray Bailey". Do you see that?
 17 A. Yes.
 18 Q. Then he says this:
 19 "I sent preliminary, key concept general assembly
 20 drawings on 20th August 2014 to Daniel Anketell-Jones
 21 for his input and approval to issue to Rydon and
 22 Studio E."
 23 Do you see that there?
 24 A. Yes.
 25 Q. Now, do you remember being sent those key concept

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1 general assembly drawings by Kevin Lamb?
 2 A. I don't remember, but I've been shown the emails where
 3 it happened.
 4 Q. And you agree that it did happen?
 5 A. Yes.
 6 Q. Yes.
 7 Can we look at another example. So if we go to
 8 {HAR00003634}. This is 22 September 2014, if we look in
 9 the email at the top, from you to Kevin Lamb, subject:
 10 "Grenfell Design":
 11 "Kev,
 12 "Could you make one change - detail 304 - change it
 13 to 2 angles in the shadow gap to allow for tolerance.
 14 "These can be issued then.
 15 "Will you be able to attend tomorrow's meeting?
 16 Will you be able to table the other details then?
 17 "Kind regards
 18 "Daniel ..."
 19 Do you see that there?
 20 A. Yes.
 21 Q. You said earlier that you weren't personally checking
 22 any of the drawings that were produced by Kevin Lamb.
 23 Do you agree that this suggests that you did sometimes
 24 check the drawings?
 25 A. I would have been checking them for structural

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1 requirements and sort of fabrication things to make sure
 2 that they could be installed. But I would expect
 3 everything to do with other elements of performance that
 4 I wasn't concerned with to go back to the architect and
 5 Building Control, such as, you know, conformity to
 6 Building Regulations. These were, you know, looking at
 7 them from a point of view of structural performance and
 8 whether it can be fabricated.
 9 Q. I see. What's this an example of, angles in the shadow
 10 gap, would you say that's fabrication?
 11 A. Yes.
 12 Q. Can we look at some more examples. If we go to
 13 {HAR00003636}, this is on 25 September 2014. We can see
 14 from the bottom email that Kevin said:
 15 "Please check attached.
 16 "The vents do not quite manage 5000mm2 ...
 17 increasing the vent width ... will get that, however
 18 didn't you mention only 2500mm2 when we were at the
 19 meeting?
 20 "Regards
 21 "Kevin ..."
 22 Then above that, you've said:
 23 "These look fine to me. Can you issue them to
 24 everyone please?"
 25 Do you see that there?

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1 A. Yes.
 2 Q. And we can also see you potentially amending drawings
 3 in November 2014. If we go to {HAR00003785}, this is on
 4 20 November from Mark Stapley to Kevin Lamb, ccing you
 5 and Rob Maxwell. He says:
 6 "Hi Kevin,
 7 "Thanks for sending over the [drawings]. Dan is
 8 going to modify die drawings EX03 and 04 so that we can
 9 reduce the width to 120mm, this will be achieved by
 10 increasing the wall thickness on the leg with the
 11 serrated edge."
 12 Do you see that there?
 13 A. Yes.
 14 Q. That suggests you were going to modify a drawing at some
 15 point or drawings? Do you agree?
 16 A. Yes, these were the structural drawings for the dies.
 17 I would have been involved in that.
 18 Q. Yes.
 19 Then could we move on to 7 May 2015. This is
 20 {HAR00004089}, and this is Grenfell Tower, 7 May 2015,
 21 so much further on in time, and you say:
 22 "Hi Kev,
 23 "When you get a sec would you mind sending me the
 24 latest [drawing] model for Grenfell. I'm trying to
 25 catch up with all the calcs.

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1 "Thanks
 2 "Dan."
 3 Do you see that there?
 4 A. Yes.
 5 Q. Then the response is at {HAR00004224}, if we can look at
 6 that. There he says:
 7 "Dan,
 8 "Attached, however the layout has become a bit messy
 9 so please call if you can't locate the info you want."
 10 Do you see that there?
 11 A. Yes.
 12 Q. Can you help us as to what you were going to be checking
 13 on these drawings?
 14 A. For every project it needs a set of structural
 15 calculations. Through the design process, you do each
 16 bit as it's required and submit it, and then you
 17 probably do a complete tidy-up at some point. I think
 18 I was just trying to do a tidy-up and make sure that
 19 everything was as had been drawn, so all the right
 20 angles were aligned with what was in the calculations
 21 before, you know, doing a final submittal.
 22 Q. Right, yes.
 23 Did you ever come across any issues with Mr Lamb's
 24 work, whether one-off issues or recurrent issues?
 25 Did you ever have cause to speak to him about his design

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1 work?
 2 A. No. No.
 3 Q. And just going back to how much time you were spending
 4 on the project, we know that you were doing the façade
 5 degree part-time. Is it right, I think you said
 6 yesterday, was that one day a week you were taking out
 7 studying on that course?
 8 A. No, you would have a week out at a time, and then you
 9 would usually have a week to do the work that had been
 10 set afterwards.
 11 Q. So during the time you were doing that course, what
 12 would you say, what percentage of your time for Harley
 13 was taken out by doing that course, would you estimate?
 14 A. I think over the course of the year it would be
 15 eight weeks.
 16 Q. Yes, okay.
 17 Now, we can see later in the project that there are
 18 examples where many drawings are issued without your
 19 approval or prior review. Let's just look at an example
 20 of that. This is {SEA00013350}. So this is Kevin Lamb
 21 on 18 August 2015, so later in time, to Simon Lawrence,
 22 copying in Ben Bailey, Mark Stapley, you, Ray Bailey,
 23 Neil Crawford. There's a lot of drawings, GA
 24 drawings -- are they general arrangement drawings? --
 25 that are being issued at that time, do you see that

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1 there?
 2 A. Yes.
 3 Q. He says:
 4 "Neil,
 5 "Please find attached curtain wall drawings all now
 6 issued for construction based upon your comments
 7 07.08.15.
 8 "The only item that has deviated from your mark ups
 9 are the internal jamb flashings on [drawing] 352 ..."
 10 Do you see that there?
 11 Now, those seem to be curtain wall drawings; does
 12 that mean they were probably about the lower levels of
 13 the tower?
 14 A. Yes.
 15 Q. In practice, how did you decide which of Mr Lamb's
 16 drawings to check? Was there some kind of system or
 17 practice that you were following in terms of what you
 18 would be checking of his work and what you wouldn't
 19 check?
 20 A. No, it would only be from individual discussions.
 21 Sometimes he'd send something to me and I might print it
 22 off and take it up to Ray to look at, but generally it
 23 would be almost entirely kept to the structural parts,
 24 because he had prior knowledge of, you know, detailing
 25 and fabrication to be able to proceed on his own.

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1 Q. At this point, I just want to ask you some more detailed
2 questions about the process for approving or signing off
3 on drawings.

4 Can you explain to us in general terms what the
5 process was by which drawings were issued by Harley and
6 then checked and signed off? What was your
7 understanding of the process that was followed at
8 Grenfell?

9 A. On Grenfell I'd only be making an assumption. I can
10 tell you what it was on other projects and how Grenfell
11 would have worked from that.

12 Q. So does that mean at the time you weren't aware of what
13 the process was for --

14 A. No, I wasn't -- I wasn't submitting drawings or getting
15 comments back. I was primarily concerned that the work
16 was happening.

17 Q. If you're line-managing Kevin Lamb, you're the design
18 manager and he's the project designer, how would he know
19 what the process was for getting drawings issued and
20 approved and signed off if you don't know? How would he
21 know?

22 A. Any time that we brought in an external designer before,
23 it wasn't like the designers in the office. You're
24 trying to bring in someone who is competent and capable
25 of running on their own. With an external designer, the

1 checks you're doing is making sure that they're keeping
2 to programme.

3 Q. So does that mean you expected Kevin Lamb off his own
4 back to be in touch with Rydon and Studio E to discuss
5 what the process was for approving drawings?

6 A. Yes, as the designer on the project, that's what you'd
7 expect.

8 Q. I see. So that was your expectation, was it? And
9 did you understand that Kevin Lamb was doing that, was
10 checking with Rydon and others what the process was for
11 approving drawings?

12 A. I would have thought that that's what had happened, yes.

13 Q. Can we just look at a few examples of what seemed to
14 happen with some of the drawings in terms of the process
15 for getting them finally signed off and approved for
16 construction. Can you turn to {SEA00012756}, and I want
17 to start by looking at the email at the bottom of page 1
18 and over on to page 2.

19 So right at the bottom there we see, on
20 17 February 2015 at 11.05, Kevin Lamb is sending
21 an email to Neil Crawford, Bruce Sounes, you,
22 Mark Stapley, Rob Maxwell, Ben Bailey, and if we go over
23 to the next page {SEA00012756/2}, he says -- is that the
24 very top of that page? Can we maybe go back to the
25 bottom of page 1. Yes, sorry, it's important to note

1 he's addressing that to Simon, do you see that,
2 Simon Lawrence? Do you see that there at the very
3 bottom of the page?

4 A. Yes.

5 Q. The email of 17 February at 11.04, "Simon", so this is
6 Simon Lawrence of Rydon. Then over the next page he's
7 saying:

8 "Please find attached revised type 10 windows, now
9 with symmetry as requested.

10 "Please approve and forward your official
11 instruction for us so as we can proceed with remakes of
12 those in manufacture."

13 Do you see that there?

14 A. Yes.

15 Q. So this is Kevin Lamb sending to Simon Lawrence for
16 approval.

17 Now, looking up this email chain, if we go back on
18 to page 1 {SEA00012756/1}, we can see that Neil Crawford
19 at Studio E then responds on the same day at 12.12:

20 "Hi Kevin
21 "Please see attached comment."

22 Do you see that there?

23 A. Yes.

24 Q. So Kevin Lamb is addressing his initial email to
25 Simon Lawrence, but it's Neil Crawford who is responding

1 first. Do you see that there?

2 A. Yes.

3 Q. Who, on your understanding, was responsible for checking
4 and approving the drawings for construction?

5 A. It would have been the architect.

6 Q. The architect, Neil Crawford, so not Rydon?

7 A. No.

8 Q. And what would that checking and approval process
9 actually entail? Did you have an understanding of it?

10 A. Not on Grenfell. It was never specifically spelt out.
11 I would be guessing.

12 Q. Okay.

13 Now, if we turn to the drawing that Mr Crawford
14 attaches with his comment, if we go to {SEA00003093},
15 this is Mr Crawford's annotation on that drawing. We
16 can see what he's done, and I think he confirmed that
17 was his writing in red. Do you see that there?

18 A. Yes.

19 Q. So he's made a comment:

20 "Better to hinge this way as per sketch of
21 email ..."

22 Do you see that there?

23 A. Yes.

24 Q. And he's marked it in the stamp on the right-hand side,
25 the Studio E architect's stamp, he's marked it status B.

1 Now, it's a little bit difficult to read here, but what
 2 status B says there is:
 3 "Conforms to design intent subject to incorporation
 4 of comments. Revise and resubmit for category A
 5 status."
 6 Do you see that there?
 7 A. Yes.
 8 Q. Now, was it your understanding on the project that, in
 9 these circumstances, the drawings did have to be
 10 resubmitted after incorporation of Neil Crawford's
 11 comments?
 12 A. Sorry, can you re-read the bit in -- that is not clear?
 13 Q. Yes. You want me to re-read the category B comment?
 14 A. Yes, please.
 15 Q. Yes, so what it says is:
 16 "Conforms to design intent subject to incorporation
 17 of comments. Revise and resubmit for category A
 18 status."
 19 Now, my question to you is: was it your
 20 understanding in these circumstances -- so where it's
 21 marked category B, it's not A, it's not "Conforms to
 22 design intent" -- that the drawing should be resubmitted
 23 to the architect after incorporating the comments they'd
 24 made?
 25 A. Trying to look back on it, I have no memory of any

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1 conclusions I would have drawn on this.
 2 Q. Yes. So you can't help us as to whether it routinely
 3 happened on the project that the drawings would be
 4 resubmitted to get the category A status?
 5 A. No, I can't help you on that.
 6 Q. Now, also on this drawing we can see a printed stamp on
 7 the bottom right of the drawing, if we zoom out again.
 8 Can you see there someone has put "Approved for
 9 construction" on the bottom? There's a stamp there. Do
 10 you see that?
 11 A. Yes.
 12 Q. Now, do you know who applied that stamp or who would
 13 have applied that stamp to this drawing?
 14 A. I don't know who did it, no, but --
 15 Q. It appears to us to be -- this is a Harley drawing and
 16 it appears that Harley had stamped it "Approved for
 17 construction" before it had been reviewed by
 18 Neil Crawford and his stamp.
 19 A. I mean, there's a lot of revisions there. I mean, how
 20 would you know he hadn't checked it at one of those
 21 previous revisions?
 22 Q. Right, well, I think we've tried to check and we're not
 23 aware that this drawing did get category A status prior
 24 to this.
 25 Were you aware on other drawings of these drawings

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1 being approved for construction with that kind of stamp
 2 before they'd been sent to Studio E or indeed Rydon?
 3 A. No, I wasn't aware.
 4 Q. Whose role would you have thought it was to apply that
 5 "Approved for construction" stamp on the project?
 6 A. It would be the designer's role to put that on on their
 7 interpretation of that statement next to the B.
 8 Q. So would you expect Mr Lamb to be applying that
 9 "Approved for construction" stamp after they've got
 10 a category A from the architect?
 11 A. I think, re-reading this now, I would still read that as
 12 that you resubmit it with those comments incorporated
 13 means that it has a category A.
 14 Q. I see. So you're saying that we can read this not as
 15 a category B but as category A, assuming these comments
 16 are going to be incorporated?
 17 A. Yes.
 18 Q. But wouldn't the architect want to check that whatever
 19 comments had been made had been properly transposed over
 20 to the next version of the drawings?
 21 A. I mean, talking from experience now, it's commonly done
 22 that way, that the architect will put his comments on
 23 the drawing, and he'll status it that if the drawing --
 24 if those comments are incorporated, it can be assumed
 25 that it's a status A.

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1 Q. But that's not what the B stamp says here, is it?
 2 A. No. Reading it now, that's the way that I interpret it.
 3 Q. I see.
 4 So just following the story of this drawing a bit
 5 further, if we go to {SEA00012758}, this is a further
 6 email from Kevin Lamb on that day, 17 February 2015, to
 7 Simon Lawrence again, ccing Neil Crawford and others,
 8 including you, on the Grenfell project, and he says:
 9 "Simon,
 10 "The window mods are now approved by Neil (as
 11 attached), so all we need now is your official go ahead
 12 to proceed."
 13 Do you see that there?
 14 A. Yes.
 15 Q. So was it your understanding that ultimately
 16 Simon Lawrence of Rydon had the final responsibility of
 17 approving the drawings for construction?
 18 A. No, I didn't have that understanding.
 19 Q. And who was it you thought was responsible for approving
 20 the drawings for construction?
 21 A. To approve them for construction, I would have thought
 22 it was the architect.
 23 Q. I see.
 24 Do you think this might have been a special case
 25 where Harley or Kevin Lamb here wanted an instruction

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1 from Rydon over and above the normal process to proceed
 2 with the drawings?
 3 A. I don't know what the timeframes are here, but I would
 4 have thought it was a -- again, I'm just guessing --
 5 that it was to do -- because it was ordering materials
 6 and he wanted to be certain that everyone was happy with
 7 it.
 8 Q. Right.
 9 If we just finish this off, if we go to
 10 {SEA00012761}, we see Simon Lawrence replies to this
 11 chain. There we have that. Again, you're copied in:
 12 "Hi Kevin
 13 "Neil has completed his comments and is happy. So
 14 you can proceed."
 15 Do you see that there?
 16 A. Yes.
 17 Q. So you can't help us as to whether that process was
 18 typical of the process that was adopted for assessment
 19 and approval of drawings on the project?
 20 A. Not for this project, no.
 21 Q. Would it be fair to say that this step-by-step process
 22 didn't always occur in such a clear manner in respect of
 23 amendments to and approval of Harley drawings?
 24 A. Sorry, can you repeat the question?
 25 Q. Would it be fair to say that this step-by-step

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1 process -- sending it to Rydon, waiting for the
 2 architect comments, getting it back and then Rydon
 3 confirming again that they're happy -- didn't always
 4 occur in respect of amendments to and approval of Harley
 5 drawings? Would you agree with that?
 6 A. I was under the belief that the process of sending them
 7 to the architect and getting them approved did always
 8 happen.
 9 Q. Let's look at another example. If we go to
 10 {SEA00013221}, and I want to look at the second email at
 11 the bottom of page 1. This is 29 May, from Kevin Lamb
 12 to Simon Lawrence, ccing the same individuals in. He
 13 writes:
 14 "Neil,
 15 "Please find attached drawings for the Crown element
 16 for approval."
 17 Do you see that there?
 18 A. Yes.
 19 Q. So although the email is being sent by Kevin to
 20 Simon Lawrence, it's being addressed in the body of the
 21 email to Neil Crawford. Do you see that there?
 22 A. Yes.
 23 Q. Can you help us as to why he would have sent it to Simon
 24 but addressed it to Neil?
 25 A. No, I can't.

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1 Q. We can then see at the top of this email chain that Neil
 2 responds to Kevin and says:
 3 "Please find attached comments on the Crown
 4 drawings."
 5 Do you see that there?
 6 A. Yes.
 7 Q. If we look at the attachment to that, this is
 8 {RYD00043547/4}. We can see that Neil Crawford has
 9 stamped the drawing status B, and annotated the drawing
 10 regarding metal copings and flashing at the roof
 11 parapet. Do you see that there? There's the red
 12 comment and the bubbles.
 13 A. Yes.
 14 Q. He says:
 15 "Existing roof parapet requires to be surveyed and
 16 metal copings/flashings to fit over."
 17 Do you see that there?
 18 A. Yes.
 19 Q. He's marked it status B again. Do you see that there?
 20 A. Yes.
 21 Q. It's clearly B, not A.
 22 If we can now turn to {SEA00013262}, we can see from
 23 the bottom email that Mr Lamb then sends another email
 24 to Simon Lawrence, copying you and others in, on
 25 1 July 2015, and he says:

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1 "Neil,
 2 "Please find attached revised coping detail to the
 3 Crown element."
 4 Do you see that there?
 5 A. Yes.
 6 Q. He says:
 7 "If you could have a quick look and pass your
 8 comments, we shall then reissue the whole of this
 9 element for construction, based upon your previous
 10 approvals."
 11 A. Yes.
 12 Q. And he makes another comment about the shorter coping in
 13 the last line.
 14 Then if we go up, we can see that Mr Lamb has
 15 actually sent it initially to the wrong Neil and then
 16 sends it to the right Neil. Then Neil Crawford at the
 17 top of that page responds on 1 July:
 18 "Hi Kevin
 19 "Please see attached.
 20 "Regards
 21 "Neil."
 22 Do you see that there? And attaches another
 23 drawing.
 24 If we can look at that, that's at {SEA00013263}. So
 25 we think that's the same drawing. This time we've got

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1 status A, "Window head/coping", "Conforms to design
 2 intent", do you see that there --
 3 A. Yes.
 4 Q. -- in the Studio E stamp?
 5 If we keep following the story of this same drawing,
 6 can we now turn to {HAR00004443}, and if we look at
 7 this, this is from Kevin Lamb to Simon Lawrence, copying
 8 in others, but again it's addressed to Neil, and it
 9 says:
 10 "Main entrance adjusted as per your further comments
 11 this morning.
 12 "Cladding [drawing] just with additional set out
 13 info for the installers."
 14 Do you see that there?
 15 A. Yes.
 16 Q. So it would appear that Neil Crawford makes some
 17 additional comments on the drawing, and then
 18 Neil Crawford to Kevin Lamb:
 19 "No further comments as attached."
 20 If we go to that attachment, if we go to
 21 {SEA00003310/3}, we can see that this is now revision B
 22 of the drawing, which was amended on 26 August 2015. We
 23 can see that at the bottom. Do you see that there?
 24 A. Yes. At the start of this chain it was talking about
 25 the crown, then this last email it was talking about the

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1 main entrance.
 2 Q. Yes.
 3 A. But then it's --
 4 Q. Then it's back to this again. This appears to be the
 5 drawing that's attached --
 6 A. Okay.
 7 Q. -- we think by Neil Crawford and it's marked status A.
 8 What I wanted to ask you is, in that example it
 9 appeared to be Neil Crawford responding saying, "Hi
 10 Kevin, no further comments as attached", whereas before
 11 it was sent to Simon Lawrence.
 12 Again, my question is: can you help us as to which
 13 was more representative of the typical approach to
 14 drawings? Was it Simon Lawrence or Neil Crawford who
 15 ultimately approved the drawings for construction?
 16 A. I wasn't working closely enough to it to be able to say
 17 definitely, but it was always my impression that it was
 18 the architect who was approving drawings.
 19 Q. Can we look now at {HAR00004590}. This is an email of
 20 20 October 2015 from Kevin Lamb to Simon Lawrence,
 21 copying you and others in. There's a large number of
 22 drawings there. He writes, "Neil", so he's addressing
 23 it again to Neil Crawford:
 24 "Please find attached GF Curtain wall elements for
 25 comment/approval."

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1 Do you see that there?
 2 A. Yes.
 3 Q. Now, one of those, in the second line of the
 4 attachments, the middle drawing is one called, "C1059
 5 GA Model 50 223". Do you see that?
 6 A. Yes.
 7 Q. If we can turn that up, this is {SEA00003316}.
 8 We can see clearly here that this hasn't got
 9 a Studio E stamp, so it has not yet been reviewed by
 10 Mr Crawford, but we can see in the bottom right-hand
 11 corner that it's said to be "Approved for construction".
 12 Do you see that there?
 13 A. Yes.
 14 Q. Can you help us as to why this drawing would be said to
 15 be approved for construction when it hasn't yet been
 16 considered by the architect?
 17 A. No, I wouldn't.
 18 Q. Mr Crawford then replies to the email, if we turn to
 19 {HAR00004669}, we have Mr Crawford, 22 October 2015,
 20 saying:
 21 "Hi Kevin
 22 "Please see attached comments on ground floor."
 23 Then if we turn to the attachments and the drawing
 24 that we were looking at, which is the C1059 223 drawing,
 25 if we go to {HAR00004670/3}, here we can see that

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1 Mr Crawford has made a number of comments to the drawing
 2 and stamped it status B. Do you see that there?
 3 A. Yes.
 4 Q. Now, following this drawing through, Mr Lamb then
 5 responds to Mr Crawford's email. This is {HAR00004743}.
 6 So this is Kevin Lamb to Neil Crawford at Studio E,
 7 26 November 2015. He copies a number of people at
 8 Harley, including you, but Simon Lawrence isn't copied
 9 in to this email or sent this email. He says:
 10 "Neil,
 11 "Please find attached GF curtain wall drawings,
 12 revised in accordance with your comments."
 13 Do you see that there?
 14 A. Yes.
 15 Q. And in the attachments that same drawing, "C1059 GA
 16 Model 51 223A" is there, and that's revision A of the
 17 drawing.
 18 If we can turn now to {HAR00001999}, this is
 19 an email on the same date, 26 November 2015, from
 20 Ben Bailey to Mike and Lucy at AGF. They're Aluminium
 21 Glass Façades Limited, I think they're a fabricator; is
 22 that right?
 23 A. I don't know, to be honest.
 24 Q. And Ben Bailey writes:
 25 "Please see our construction issue drawings attached

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1 for Grenfell Tower.”
 2 We can see the second email down on this chain is
 3 the email from Kevin Lamb returning the revised drawings
 4 to Neil Crawford. If we look down that page, that was
 5 Kevin Lamb returning them to Neil Crawford. If we go
 6 over to the next page {HAR0001999/2}, we can see that.
 7 But we can’t find any response from Neil Crawford
 8 confirming the revisions are acceptable and stamping the
 9 drawings status A, and yet it’s been sent by Ben Bailey
 10 to the fabricators .
 11 The question that we wanted to put to you is :
 12 would it be usual for Harley to send out construction
 13 issue drawings without waiting for Studio E to revert
 14 with a stamped status A drawing?
 15 A. It wouldn’t be normal on other projects , no.
 16 Q. Do you agree it would be best practice to wait for
 17 Mr Crawford to return having marked the drawings as
 18 status A?
 19 A. The only reason that you’d send them out beforehand is
 20 if you were trying to get approximate pricing for
 21 something, otherwise it would be best practice .
 22 Q. Do you agree that that might deprive Studio E and Rydon
 23 of the opportunity to see the final version before it
 24 was issued for construction?
 25 A. If that was done, yes.

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1 Q. Was there anyone supervising you as the design manager
 2 during the Grenfell project? So we’ve talked about your
 3 supervision of Mr Lamb, but was anybody supervising you
 4 as his design manager?
 5 A. I wasn’t his design manager on anything more than
 6 programme, and that was to be reported back to the
 7 project manager and the contracts manager, so they would
 8 have been interested in how he was maintaining
 9 programme, and it would have been reported back that
 10 way. My line manager was Mark Stapley. But every time
 11 that we brought in an external design resource, it was
 12 that they were, you know, competent to do the work under
 13 their own steam. They wouldn’t be line -managed from
 14 a point of view of checking the quality of their work.
 15 The point of going to an external design resource at
 16 that time was because you needed someone who was capable
 17 and wasn’t going to be -- have to have someone shadowing
 18 all their work.
 19 Q. Yes, okay.
 20 On projects of this size and complexity, in your
 21 experience, would it be normal to have a matrix of
 22 responsibilities setting out which contractor or
 23 subcontractor was responsible for each element of the
 24 design?
 25 A. On other projects , that was the normal thing to do.

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1 Q. Yes.
 2 Did you ever query why on the Grenfell project there
 3 was no such design responsibility matrix?
 4 A. I think because of my limited involvement, I didn’t get
 5 involved to that extent.
 6 Q. So does it follow that you didn’t think it was unusual
 7 that no such design responsibility matrix had been
 8 established on the project?
 9 A. On other projects they had been established. I’m not
 10 sure if they’d become the norm as they are now.
 11 Q. To your knowledge, did anyone at Harley ever suggest
 12 that such a matrix might be helpful on the project?
 13 A. No.
 14 Q. Do you think such a matrix would have been helpful on
 15 the project?
 16 A. From looking back at it now, yes, it would.
 17 Q. Yes.
 18 Now, I’m going to ask you some questions about the
 19 ACM in a moment, but before we get to that, I just want
 20 to look at what you say at paragraph 26 of your witness
 21 statement about the design process more generally. This
 22 is at {HAR00010149/6}, and I want to look at
 23 paragraph 26.
 24 So if we can read what you say there, you say:
 25 “There is a hierarchy in construction design where

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1 the senior design team consisting of the architects ,
 2 consultants (fire , acoustic and structural) and
 3 Building Control sit at the top. The main contractor
 4 sits under this and the subcontractor designers sit at
 5 the bottom. The senior design team are seen as the
 6 experts and therefore their opinion is always deferred
 7 to by everyone sitting below them.”
 8 Do you see that there?
 9 A. Yes.
 10 Q. Now, would you agree that Harley had a responsibility to
 11 consider the viability of the design regardless of any
 12 perceived hierarchy?
 13 A. I think Harley could only comment on and, you know,
 14 perceive the viability of the design on the areas that
 15 they were expected to be experts in , which was the
 16 fabrication and installation parts. That’s where their
 17 expertise lied . You know, points such as, you know,
 18 performances were not, you know, certainly at that time,
 19 without a technical manager, where their expertise lied .
 20 Q. Do you agree in terms of fire performance that Harley
 21 could reasonably be expected to provide design input on
 22 a project like Grenfell?
 23 A. I don’t see how they could without that expertise .
 24 Q. Do you accept that when it came to specialist design
 25 input in relation to the façade, Harley were not sitting

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1 at the bottom of the hierarchy; when it came to the
 2 façade, as specialists, Harley were actually higher up
 3 that hierarchy than you've portrayed in that paragraph?
 4 A. Only on the points of installation and fabrication.
 5 Q. You go on to say in the next main paragraph, third line
 6 down, at the top of page 7 {HAR00010149/7}, so if we go
 7 over the page, within paragraph 27, you say this, third
 8 line down there:
 9 "As far as I was aware the materials were all
 10 compliant as they had all been selected and specified by
 11 architects and the specification and drawings had been
 12 reviewed and approved by a fire consultant and
 13 Building Control. I am not aware of anyone raising any
 14 issue or concern about the materials being used at any
 15 stage."
 16 Now, we've done a lot, and I don't want to go over
 17 it again, about whether it had been selected and
 18 specified by the architects, but I want to ask you a bit
 19 about the fire consultant. You say:
 20 "... and drawings had been reviewed and approved by
 21 a fire consultant ..."
 22 Do you see that there?
 23 A. Yes.
 24 Q. Which fire consultant are you referring to?
 25 A. If I'm talking about my knowledge then, I would have

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1 just known that there was a fire consultant on the
 2 project. Looking back at it now, I would say that was
 3 Exova.
 4 Q. Yes. So you wouldn't have known at the time that it was
 5 Exova?
 6 A. No, I wasn't involved enough with the project.
 7 Q. So would you agree that, at the time, you wouldn't have
 8 known that the architect's drawings and the
 9 specification had been approved by a fire consultant?
 10 A. No, I would have expected that to have been done at what
 11 was referred to as the stage 4 design.
 12 Q. Did you ever seek any assurances that a fire consultant
 13 had reviewed the drawings?
 14 A. No, but if I'd been the designer on the project, it's
 15 what I would have done.
 16 Q. Would it be fair to say that you did not take any
 17 positive steps to confirm that a fire consultant had
 18 approved the drawings?
 19 A. It's fair to say that, but it wasn't my position to do
 20 that.
 21 Q. Were you ever under the impression that it was Harley's
 22 responsibility to establish a fire strategy for the
 23 cladding design?
 24 A. No, I would have assumed that that was done before the
 25 stage 4 design by the architect.

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1 Q. That was something Mr Sounes said in his statement --
 2 that's the transcript at {Day12/168:9} -- that it was
 3 Harley's responsibility to establish a fire strategy for
 4 the cladding design. You don't agree with that; is that
 5 right?
 6 A. No, I think it goes back to what you said about having
 7 a design matrix.
 8 MS GRANGE: Now, I want to ask you some questions about the
 9 ACM.
 10 Mr Chairman, I won't finish this topic today, but if
 11 you're happy to sit until 4.30, I would like to keep
 12 going for now.
 13 SIR MARTIN MOORE-BICK: Yes, all right.
 14 MS GRANGE: Thank you.
 15 Can we start by looking at the design team meeting
 16 minutes on 13 August 2014. This is at {RYD00016885}.
 17 So this is the design team meeting number 1 on
 18 13 August 2014, and we can see that you are present
 19 there at the bottom of the first column of lists of
 20 names, Dan Anketell-Jones and Kevin Lamb, we see that
 21 there.
 22 A. Yes.
 23 Q. If we go to section 7 on page 5 {RYD00016885/5} and read
 24 at the bottom at 7.01, we can see it says:
 25 "Planning.

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1 "An overview of the Planning Application and
 2 discharge was given by BC & SL to bring everyone up to
 3 speed."
 4 So that would be Simon Lawrence and -- I don't know
 5 who BC is there.
 6 "Following several months of discussions, mock-ups
 7 and negotiations the final material submission was
 8 forwarded to Planners at the end of July. Forming sign
 9 off is anticipated 29/8/14. Our feelings are that the
 10 risk around planning sign off is now low as the design
 11 to date is now in line with the Planners requests.
 12 "SL confirmed that we are to proceed [to] design
 13 based on the following criteria .
 14 •" Champagne coloured Cladding panels for the main
 15 part of the building ..."
 16 Do you see that there?
 17 A. Yes.
 18 Q. •" Rainscreen cladding to be cassette (hidden fixing)
 19 type."
 20 And then he goes on about other aspects of it .
 21 Was it your understanding by this point -- so
 22 I think this is the first design team meeting and you're
 23 there -- the decision had been taken to use the
 24 Reynobond rainscreen cladding panels?
 25 A. Yes.

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1 Q. Did you understand at the time that the product was
2 formed of two thin sheets of aluminium with a low
3 density polyethylene, PE, core? Did you understand that
4 at the time?
5 A. I understood that it had a core but I didn't understand
6 what it was.
7 Q. Can you explain why you weren't interested in the core?
8 Why was that not something you wanted to know as the
9 design manager for this project, what was in the core of
10 the main rainscreen panels?
11 A. I think for this project I was only responsible for
12 making sure that Kevin got started and then to make sure
13 he got on according to programme. In respect of other
14 projects, I would usually submit all that information to
15 Building Control and the architect to get signed off.
16 SIR MARTIN MOORE-BICK: Can I just ask, from a structural
17 point of view, you would need to know the weight of the
18 panels, wouldn't you?
19 A. Yes.
20 SIR MARTIN MOORE-BICK: And therefore possibly their
21 composition?
22 A. That's usually specified as an overall weight per metre
23 squared.
24 MS GRANGE: Now, I've asked you a little bit about your
25 knowledge of other cladding fires, and I think you've

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1 said that you didn't have much knowledge at the time of
2 cladding fires, whether domestic or international; is
3 that correct?
4 A. That's correct.
5 Q. So were you not aware at this time that there had been
6 cladding fires abroad on buildings containing
7 polyethylene, PE, cored panels?
8 A. No.
9 Q. If you had been asked, "What is the core made of?",
10 would you have been able to give an answer?
11 A. No.
12 Q. So you didn't understand that there was polyethylene in
13 the core?
14 A. Not that I can remember, no.
15 Q. Had you been told that it was polyethylene, would you
16 have had any concerns in terms of fire performance with
17 a polyethylene core?
18 A. At that point I don't think it would have jumped out.
19 I think that I'd worked on projects previously where the
20 same products had been signed off, and if it had been
21 signed off by Building Control there, I thought it would
22 be okay anywhere else.
23 Q. Can we turn up an email. This is {CEP00049719}. If we
24 can blow that up and the top half of that page. This is
25 an email from Deborah French of Alcoa on 13 May 2013 to

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1 individuals at CEP, including Geof Blades.
2 Did you know Deborah French at Alcoa?
3 A. No.
4 Q. Did you know her?
5 A. No, never spoken to her.
6 Q. What about Geof Blades at CEP? Did you know him?
7 A. Knew of him; I'm not sure that I ever spoke to him
8 particularly.
9 Q. Now, just to be clear, you're not copied in to this
10 email, I'm not saying you knew about this at the time,
11 but what she says is:
12 "Hi
13 "As you may be aware there had been some reports via
14 BBC concerning a fire on a building in UAE regarding
15 ACM.
16 "As a business we are aware of this report and our
17 technical team are following the details, but in the
18 meantime I wanted to add some thoughts that may help if
19 you get questions from your customers/clients etc.
20 "Regarding the supply of Reynobond in the UK, as you
21 know we supply both PE and FR core and can control and
22 understand what core is being used in all projects due
23 to the controlled supply route we have. By only
24 supplying Reynobond to a very small group of Approved
25 Fabricators and working very closely with them on all

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1 projects we are able to follow what type of project is
2 being designed/developed and then offer the right
3 Reynobond specification including the core.
4 "At this stage we will continue to offer both PE &
5 FR core and continue the close working relationship we
6 have with our Approved Fabricators to make sure the
7 right technical support ..."
8 Et cetera, et cetera. Do you see that there?
9 A. Yes.
10 Q. Were you ever made aware of this email or the substance
11 of what's in this email?
12 A. No.
13 Q. Were you aware of fires in the UAE involving ACM in or
14 around May 2013?
15 A. No, I think the first time that I learnt about those was
16 when I was doing the course at Bath.
17 Q. Right. So you were never made aware before that of the
18 contents of this email, ie that there were concerns in
19 the industry arising out of these fires in 2013?
20 A. No.
21 Q. Were you aware that Reynobond ACM could be supplied with
22 either a PE or an FR core?
23 A. No, again, I think that was something that I didn't
24 learn about until I was at Bath.
25 Q. So you weren't aware at the time of the Grenfell project

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1 that there was an FR core to the Reynobond, a fire
 2 retardant, fire resistant core?
 3 A. Not that I can remember, no.
 4 Q. So you didn't ever have any discussions with anybody at
 5 Alcoa or CEP about whether a PE or FR core should be
 6 used on the Grenfell project?
 7 A. No, I think I had virtually no communications with CEP
 8 or Alcoa.
 9 MS GRANGE: Mr Chairman, I think that's probably
 10 an appropriate moment, because there's a little bit to
 11 go on this topic.
 12 SIR MARTIN MOORE-BICK: Right.
 13 MS GRANGE: So I will need to ask this witness to come back
 14 tomorrow morning.
 15 SIR MARTIN MOORE-BICK: Well, you did indicate that. Can
 16 you give me some idea of how long you might require him?
 17 MS GRANGE: I would hope to be about an hour in the morning
 18 with him.
 19 SIR MARTIN MOORE-BICK: Right.
 20 Well, Mr Anketell-Jones, I'm sorry that we've not
 21 been able to finish your evidence today, and I'm sure
 22 you would have liked to have got away, but I'm afraid
 23 I'm going to have to ask you to come back tomorrow for
 24 a few more questions.
 25 Judging by what Ms Grange has said, I think you can

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1 hope to get away between 11.00 and 11.30, if that
 2 affects your arrangements.
 3 But we're going to break now, so I'll ask you to be
 4 back here at 10 o'clock to start again in the morning,
 5 and please not to talk to anyone about your evidence
 6 over the break. All right?
 7 THE WITNESS: Yes, sir.
 8 SIR MARTIN MOORE-BICK: Thank you very much. Would you like
 9 to go with the usher, please.
 10 (Pause)
 11 Right, Ms Grange, 10 o'clock tomorrow morning.
 12 MS GRANGE: Yes, thank you.
 13 SIR MARTIN MOORE-BICK: Thank you very much.
 14 (4.30 pm)
 15 (The hearing adjourned until 10 am
 16 on Wednesday, 16 September 2020)

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 2 MR DANIEL ANKETELL-JONES (continued)1
 3 Questions from COUNSEL TO THE INQUIRY1
 (continued)

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