

OPUS 2

INTERNATIONAL

Grenfell Tower Inquiry

Day 14

March 16, 2020

Opus 2 International - Official Court Reporters

Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

Website: <https://www.opus2.com>

1 Monday, 16 March 2020
 2 (10.00 am)
 3 SIR MARTIN MOORE-BICK: Good morning, everyone, and welcome
 4 to today's hearing.
 5 As you can see, I'm here on my own this morning, and
 6 that's because the Inquiry learned quite late last night
 7 that Ms Istephan has been taken ill and will be unable
 8 to attend today's hearing.
 9 Some of her symptoms seem to be similar to those
 10 that we have been led to expect of COVID-19, but it's
 11 too early to know whether she has contracted the virus,
 12 and we shan't know that for a little while.
 13 She is, however, able to follow the proceedings
 14 remotely, and she is able to communicate with
 15 the Inquiry by email.
 16 In those circumstances, any vulnerable individuals
 17 or those who may be concerned about COVID-19 should
 18 obviously feel free not to attend any hearings in
 19 person -- and I see that there are very few members of
 20 the public here today -- and should instead follow the
 21 proceedings remotely on the live stream.
 22 But I would like to reassure you that stringent
 23 cleaning measures have been put in place at the
 24 premises, including over the weekend, and will continue
 25 for as long as is necessary. In addition to the

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1 installation of hand sanitiser throughout the venue, we
 2 have increased daily cleaning activity to ensure that
 3 all surfaces in the public areas are wiped regularly
 4 with an appropriate form of disinfectant, and I'll talk
 5 to you a little later about our thoughts about how we
 6 continue from here.
 7 Before I do that, I understand that Mr Williamson
 8 wants to address me.
 9 Yes, Mr Williamson.
 10 Submissions by MR WILLIAMSON
 11 MR WILLIAMSON: Good morning, sir. Thank you for this
 12 opportunity. As you will recall, I appear on behalf of
 13 Team 2 of the bereaved, survivors and residents.
 14 Self-evidently, the COVID-19 position has changed
 15 considerably since we last met on Thursday. Since then,
 16 numerous responsible organisations have taken steps
 17 additional to those which the Government has prescribed;
 18 for example, universities are stopping face-to-face
 19 teaching, many businesses have told their staff to work
 20 from home, many businesses and other organisations are
 21 screening visitors, football matches have been postponed
 22 and so on. I should say that, with regard to this
 23 Inquiry, as I think is evident in the room, some of the
 24 law firms involved and many of the core participants
 25 involved have now taken the view that they cannot

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1 responsibly require their staff to attend.
 2 Clearly, the Inquiry cannot simply carry on as if
 3 nothing is happening, nor can it, with respect, shelter
 4 behind the assertion that it will follow Government
 5 advice. The Inquiry needs itself to consider, and to
 6 announce publicly the results of such consideration, as
 7 to what it considers should be done to protect the
 8 health of those involved.
 9 It seems to us that there are three issues now. The
 10 first is the news which we received very late last night
 11 as to the unfortunate illness of Ms Istephan. Clearly
 12 the news that she may have the virus is very concerning
 13 for her and others. Until her position is clarified --
 14 and, I should say, that may not be easy due to the lack
 15 of testing facilities -- we do not see how the hearing
 16 can proceed in any event, with a panel of two members,
 17 one of whom is unfit to attend. There is also obviously
 18 the question of those with whom she has been in contact.
 19 Secondly, the Inquiry needs to consider, as are all
 20 other responsible organisations, whether there are
 21 additional steps that can be taken at the premises to
 22 make them safe; for example, the screening of attendees,
 23 additional cleaning that's been referred to, staff
 24 rotation and so on. It seems to us that the Inquiry
 25 needs to consider those matters, tell the core

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1 participants what is proposed, and to listen carefully
 2 to any comments.
 3 Thirdly, and more generally, it seems highly
 4 unlikely for numerous reasons that the hearing is going
 5 to be able to proceed for very long, if at all, at this
 6 venue, and so we need to consider what can be proposed
 7 by way of virtual or remote hearings so that we can take
 8 instructions from our clients on any such proposals.
 9 It does seem to us that the Inquiry needs to consult
 10 with the core participants on this issue, and to take
 11 careful account of their comments. Clearly, in all of
 12 this, the bereaved, survivors and residents need to be
 13 consulted and they need to be at the centre of the
 14 process. This Inquiry was set up to review an avoidable
 15 tragedy; it should not itself be the source of further
 16 avoidable tragedy.
 17 So I would finally urge you, sir, to listen
 18 carefully to what I have said, and to take some time to
 19 respond. Simply to carry on with the next witness as if
 20 nothing is happening is not an option, in our respectful
 21 submission.
 22 Thank you.
 23 SIR MARTIN MOORE-BICK: Before you go, Mr Williamson, you
 24 won't be surprised to hear that we have been having
 25 these things very much in mind, and of course we didn't

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1 know until quite late yesterday evening that Ms Istephan
2 was unwell and we still don't know, as I said, what the
3 problem is. But we have been giving consideration to
4 means by which the hearings can continue, at least for
5 the time being, one of which we might talk about in
6 a moment, which is limited-attendance hearings.

7 Could you help me, first of all, on your first
8 point, which is you adumbrated, but you passed over
9 quite quickly, that we couldn't continue without
10 Ms Istephan.

11 MR WILLIAMSON: Well, it's a panel of two which is now
12 reduced to one.

13 SIR MARTIN MOORE-BICK: Well, yes and no. Ms Istephan is
14 apparently -- we have been in contact with her this
15 morning. She is able to follow the proceedings on the
16 live link, she is able to communicate with us by email
17 and, I imagine, telephone if that were necessary.

18 Are you suggesting there is what I might call
19 a constitutional problem here, or is it just a matter of
20 finding a sensible procedure which will enable her to
21 participate to the appropriate extent?

22 MR WILLIAMSON: We obviously don't know, nor indeed anybody,
23 exactly what's wrong with Ms Istephan, but clearly she
24 must be able to participate fully in the hearing, and if
25 that is possible, then that may be a resolvable problem.

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1 SIR MARTIN MOORE-BICK: We have the live stream.

2 MR WILLIAMSON: Yes.

3 SIR MARTIN MOORE-BICK: And I had a message from her this
4 morning saying that she was intending to follow
5 proceedings on the live stream. The recording can be
6 viewed at any time from any location, so the evidence
7 can be reviewed.

8 MR WILLIAMSON: Except that while Relativity is down,
9 I don't think it's possible elsewhere, is it, to review
10 the documents?

11 SIR MARTIN MOORE-BICK: I think the live stream is available
12 on YouTube. That's my understanding. I'm looking at
13 Mr Millett for some help. I don't think it's dependent
14 on Relativity.

15 Do we know the answer to that?

16 MR MILLETT: Yes, Ms Istephan has access to the live stream,
17 even though Relativity is down.

18 SIR MARTIN MOORE-BICK: Thank you. So she can follow the
19 proceedings.

20 I mean, I have myself been thinking about whether
21 her presence at the hearing is essential to the
22 continuation of the Inquiry, and I am provisionally
23 coming to the view that, providing we can be satisfied
24 that she can view all the evidence and communicate with
25 us if necessary, that would be adequate. But if you

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1 want to say otherwise, I would welcome your views.

2 MR WILLIAMSON: Well, the message that we got last night was
3 simply -- and it was very late last night -- that
4 Ms Istephan was ill, and clearly illness can take many
5 forms. It may be that she is being precautionary or it
6 may be she is actually under the weather. One doesn't
7 know.

8 SIR MARTIN MOORE-BICK: So can I take it, then, that you
9 would be minded to accept that provided she can and
10 of course does view the evidence in its entirety, that
11 would be adequate?

12 MR WILLIAMSON: Sir, I'm receiving information -- this is
13 not a criticism, because obviously events are unfolding
14 almost faster than the human mind can catch up with, but
15 I'm receiving information on the hoof and I don't want
16 to make policy on the hoof, so I will want to take
17 instruction on that point.

18 SIR MARTIN MOORE-BICK: But this is really a point of
19 principle, isn't it? In another context, you might say
20 that -- take an arbitration panel as an example -- it
21 can't sit without a full complement of arbitrators. We
22 are not in quite that situation. I sense from what you
23 were saying that you would probably not argue that the
24 same principle applied here.

25 MR WILLIAMSON: Well, I don't think there is necessarily

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1 a technical point.

2 SIR MARTIN MOORE-BICK: That's really what I wanted to flush
3 out.

4 MR WILLIAMSON: I think the test is whether Ms Istephan is
5 both fit to proceed and is able technologically to take
6 as much part from wherever she is -- presumably at
7 home -- as she would if she were here.

8 SIR MARTIN MOORE-BICK: If she were not well enough today
9 but could view evidence, if any were given today,
10 tomorrow on the live stream, would that not do? It
11 wouldn't be a live stream, of course, it would be
12 a recording, but ...

13 MR WILLIAMSON: Sir, with respect, I think that does
14 slightly shade into the other points which I was making.
15 If the assumption is that we are going to carry on in
16 the current set-up indefinitely, that is one situation,
17 but that, with respect, seems highly unlikely.

18 SIR MARTIN MOORE-BICK: Yes.

19 MR WILLIAMSON: I think our overall position is that there
20 needs to be a pause for reflection -- that may cause
21 inconvenience to the next proposed witness -- reflection
22 and consultation, and to decide on what might be
23 described as a medium-term strategy.

24 SIR MARTIN MOORE-BICK: Do you want to make any suggestions
25 at this stage about medium-term strategy, or indeed

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1 short-term strategy?
 2 MR WILLIAMSON: I think we need to know from you what is
 3 technologically possible -- not from you personally, but
 4 from your team -- and then we need to take instructions
 5 on that. Because there will obviously be a tension
 6 between health on the one hand and participation on the
 7 other.
 8 SIR MARTIN MOORE-BICK: I think one thing that certainly has
 9 been passing through my mind, and is technologically
 10 feasible, subject to people's agreement, is that we hold
 11 limited-attendance hearings, in this room but with
 12 attendance limited to those whose presence is essential,
 13 which would, apart from the panel and counsel, be
 14 obviously the witness, but also all those who support
 15 our functions: the shorthand writers, the ushers,
 16 technicians and so on. That might involve actively
 17 excluding most, if not all, of the lawyers and all the
 18 public.
 19 Is that something you have given any thought to?
 20 MR WILLIAMSON: We haven't thought about the exclusion
 21 issue. We have obviously thought about the remote
 22 working issue.
 23 SIR MARTIN MOORE-BICK: Well, yes, but it depends what you
 24 mean by remote working.
 25 MR WILLIAMSON: I haven't personally considered the option

1 you have just put, which is sort of a hybrid between
 2 carrying on and a fully remote hearing. I think there
 3 is a potential route which involves taking as many
 4 people out of this building as possible, provided that
 5 those who are in dialogue with Counsel to the Inquiry
 6 can continue that dialogue, and that is going to need
 7 some adjustment to our methods of working.
 8 SIR MARTIN MOORE-BICK: Right.
 9 MR WILLIAMSON: For example, we have been considering
 10 document access and also, as it were, virtual access to
 11 Mr Millett and his team. For example, one might say,
 12 when a witness -- and I'm just thinking out loud here --
 13 finishes the evidence that Counsel to the Inquiry wish
 14 to extract, one might then have a slightly longer pause
 15 than we have had heretofore. There could then be
 16 a telephone conference between, for example, Mr Millett
 17 and those who are interested in which there can be
 18 discussion of any additional points that need to be put,
 19 in addition, obviously, to the use of email and so on
 20 for more formal communications.
 21 SIR MARTIN MOORE-BICK: All right, thank you. That's
 22 helpful.
 23 Is there anything else you want to add to that?
 24 MR WILLIAMSON: No. But I should say my instructions as
 25 such are limited to the suggestion that we should all

1 pause to reflect how we move forward, so I'm not in
 2 a position to commit my clients to any particular way of
 3 moving forward, and that does seem to us to involve
 4 a dialogue.
 5 SIR MARTIN MOORE-BICK: Thank you.
 6 Is there anyone else who would like to make any
 7 observations about this?
 8 Ms Barwise, do you want to come and say something?
 9 MS BARWISE: Sir, if you wouldn't mind.
 10 SIR MARTIN MOORE-BICK: Of course, come on.
 11 Submissions by MS BARWISE
 12 MS BARWISE: Obviously I have just heard what my learned
 13 friend said, sir, but for our part we would very much
 14 prefer your hybrid option of continued participation by
 15 those who are able and willing to do so, which hopefully
 16 includes yourself and the Counsel to the Inquiry team
 17 and those staff that you might need to help you.
 18 We appreciate, obviously, that you are and will be
 19 addressing how you continue. For our part, we feel it's
 20 terribly important the Inquiry does continue as best it
 21 is able, but obviously bearing in mind the needs of
 22 health and safety, your own included, sir.
 23 So we leave it in your hands, but we should most
 24 welcome carrying on today as we are, given we're all
 25 here, the witness is here. We wish to carry on. We

1 would suggest that if it becomes necessary in due course
 2 even to cross-examine by videolink, that might be
 3 possible, and I'm sure that your minds will all be
 4 turning to those questions over the coming days.
 5 But, again, we default to the position that we don't
 6 want to pause now unless it becomes absolutely
 7 inevitable.
 8 SIR MARTIN MOORE-BICK: So do I understand this correctly:
 9 you don't wish to argue that the absence of
 10 Ms Istefhan's personal presence in the room is a fatal
 11 bar to continuing?
 12 MS BARWISE: Absolutely not, sir. I think her physical
 13 presence is, with the greatest respect to her,
 14 completely irrelevant, because if she is able to
 15 participate with you --
 16 SIR MARTIN MOORE-BICK: It's a second-best to have to view
 17 it on the live link or recording, but it's reasonable.
 18 All right.
 19 MS BARWISE: It's reasonable, and she can see the documents
 20 that the operator puts up. There is no disadvantage,
 21 save that you can't immediately communicate with her.
 22 SIR MARTIN MOORE-BICK: You wouldn't have any objection to
 23 what I have called limited-attendance hearings?
 24 MS BARWISE: No, sir.
 25 SIR MARTIN MOORE-BICK: We might need to have a discussion,

1 if we were to take that course, as to how limited the
 2 attendance should be.
 3 MS BARWISE: Indeed.
 4 SIR MARTIN MOORE-BICK: Because it might be necessary to
 5 exclude actively some people who might be willing to be
 6 here but whose presence isn't really essential .
 7 MS BARWISE: Yes, I understand that, sir , and it may be --
 8 probably would be -- that that is in fact a responsible
 9 course, given we can all participate , and perhaps the
 10 only thing I would say is that if you were to adopt that
 11 course, it might be wise to allow slightly longer breaks
 12 when you break for the witness --
 13 SIR MARTIN MOORE-BICK: Oh yes, of course.
 14 MS BARWISE: -- to facilitate email communication with
 15 Counsel to the Inquiry, because obviously I'm conscious
 16 that's a difficult process.
 17 SIR MARTIN MOORE-BICK: I gather it has been going on
 18 already, so it just needs to be a bit more refined.
 19 MS BARWISE: It has indeed, we have been bending ears, but
 20 we would like the option to do that by email.
 21 SIR MARTIN MOORE-BICK: Thank you very much.
 22 Does anybody else want to say anything about this?
 23 No? All right .
 24 Now, you all know, I think, that we have witnesses
 25 waiting to come on who have travelled from the north of

1 England, and that's something we need to take into
 2 consideration.
 3 I'm going to rise for a moment to just consider
 4 what's the best way forward for today, and once we have
 5 decided that, we can then consider how we should take
 6 things forward thereafter .
 7 It won't come as a surprise to any of you to know
 8 that at least two people in this room might not be able
 9 to be here if the Government decides that over 70s
 10 should be banned from going out. Mr Mansfield and
 11 I certainly fall into that category. I don't think
 12 anyone else does, but if you do, well, same problem.
 13 All right, I'm going to rise for a few minutes now.
 14 Thank you.
 15 (10.20 am)
 16 (A short break)
 17 (10.30 am)
 18 SIR MARTIN MOORE-BICK: Well, I'm grateful to counsel for
 19 their submissions.
 20 It seems to me that there are, in principle, three
 21 options: one is to carry on regardless until people
 22 become ill, in which case we would have to suspend the
 23 hearings anyway; the second is to continue hearings as
 24 far as we can on a limited basis, ensuring that the
 25 minimum number of people whose presence is necessary are

1 here; the third would be to suspend hearings altogether
 2 for an indefinite period.
 3 The first is obviously, I think, not a responsible
 4 course. We have to have regard to the health of all
 5 those who take part in the hearings and support them.
 6 We are, however, keen to continue making progress,
 7 because we think it's important and in the public
 8 interest for us to do so, and to lose as little time as
 9 we reasonably can, so suspending the hearings at this
 10 stage does not seem to be sensible if there is
 11 a reasonably satisfactory alternative .
 12 We have already consulted core participants .
 13 Yesterday evening, the Solicitor to the Inquiry wrote to
 14 the legal representatives of core participants setting
 15 out the different possibilities and inviting their views
 16 on the best way forward. I think we asked to receive
 17 responses by the end of today and, in the light of those
 18 responses, when we've received them, we shall take
 19 a decision about what to do over the immediately coming
 20 days.
 21 But it's right to say that we are giving serious
 22 consideration to what I identified as the second course,
 23 which is limited-attendance hearings at which, subject
 24 to the agreement of all those who support the Inquiry,
 25 we should continue to take evidence from witnesses,

1 provided, of course, it's reasonable to ask the
 2 witnesses to come here, whilst excluding from the room
 3 all those whose presence is not strictly necessary.
 4 As I say, we shall not take a decision on that until
 5 we have received responses from core participants , but
 6 that is the way that our minds are currently working at
 7 the moment.
 8 As I mentioned earlier, we have witnesses from the
 9 north of England who have come down to give evidence
 10 today, and it would seem sensible to take their evidence
 11 today on the basis that, although this will not be
 12 formally a limited-attendance hearing, in the sense that
 13 we shall exclude actively those whose presence is not
 14 essential , I would encourage anyone who is reluctant to
 15 be here to go home or to go back to your office or
 16 wherever and watch the proceedings on the live link .
 17 Certainly you will cause no offence by doing that, and
 18 if the room empties when I have finished speaking,
 19 I shall understand why.
 20 On that basis, I have reached the conclusion that
 21 the best thing is to carry on on the basis that I have
 22 indicated today. At the end of the day, we shall review
 23 the position and decide whether to institute
 24 limited-attendance hearings tomorrow on the basis that
 25 we shall not allow in those whose attendance is not

1 necessary for the purpose.
 2 So, Mr Millett, do we have a witness who is ready to
 3 come and give evidence?
 4 MR MILLETT: Yes, Mr Chairman, we do. We have Cate Cooney
 5 from Exova who is ready to give evidence.
 6 SIR MARTIN MOORE-BICK: Right. Thank you.
 7 If anyone wants to go, please feel free to do that.
 8 MS CATE COONEY (affirmed)
 9 SIR MARTIN MOORE-BICK: Thank you very much, Ms Cooney. Sit
 10 down, make yourself comfortable.
 11 THE WITNESS: Thank you.
 12 SIR MARTIN MOORE-BICK: Yes, Mr Millett.
 13 Questions from COUNSEL TO THE INQUIRY
 14 MR MILLETT: Ms Cooney, good morning.
 15 A. Good morning.
 16 Q. Thank you very much for attending today to give
 17 evidence.
 18 Could we start, please, by your telling the Chairman
 19 your full name?
 20 A. Catherine Cooney.
 21 Q. If you have any difficulty understanding the questions
 22 that I'm going to ask you, then please say. I can
 23 either repeat the question or I can put the question in
 24 a different way.
 25 If you feel you need a break at any point, please

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1 let me know.
 2 One other thing, please, if you wouldn't mind
 3 keeping your voice up so that the transcribers, who sit
 4 there to your right, can get down what you're saying,
 5 that would be very helpful.
 6 Now, you have made one statement for the Inquiry, if
 7 I could please take you to that. It's in the folder in
 8 front of you on the desk, but it will appear also on the
 9 screen, because we're going to be going to it, and it's
 10 probably better to follow it on the screen, but if you
 11 would prefer, then please do follow it in the paper form
 12 in front of you.
 13 It's dated 28 September 2018. If we could have that
 14 up, please, on the system {EX000001590}.
 15 Could you please identify that formally as your
 16 witness statement?
 17 A. It is.
 18 Q. Could you please go to page 8 {EX000001590/8}. You will
 19 see there at the bottom of page 8 a signature over the
 20 date, 28 September 2018. Is that your signature?
 21 A. It is.
 22 Q. Just for the record, that is Relativity reference
 23 {EX000001590}.
 24 Ms Cooney, have you read this statement recently?
 25 A. I have, yes.

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1 Q. Thank you. Can you confirm that the contents are true?
 2 A. Yes.
 3 Q. Have you discussed your evidence that you are going to
 4 give today with anybody before coming here this morning?
 5 A. Yes, with my solicitors.
 6 Q. Right.
 7 Now, there are a number of exhibits to the statement
 8 which are shown on the schedule, which we will just have
 9 up as well, please. That's {IDX0056}.
 10 Could you just confirm, please, for us that that is
 11 a list of the exhibits attached to your statement?
 12 A. It is.
 13 Q. Thank you very much.
 14 Now, Ms Cooney, I'm going to start, if I may, by
 15 asking you some questions about your background and
 16 experience, all right? I'm just going to summarise for
 17 you what you say in your statement.
 18 You began, I think, working in the construction
 19 industry in the early 2000s; yes?
 20 A. Yes.
 21 Q. And you completed an undergraduate degree in French?
 22 A. Yes.
 23 Q. What was your first involvement in the construction
 24 industry?
 25 A. I worked for some -- as an assistant surveyor for

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1 building surveying practices to start off with, then
 2 I moved into building control within a couple of years
 3 of that.
 4 Q. Right. Roughly what year did you move into
 5 building control?
 6 A. It was December 2003.
 7 Q. Right.
 8 Now, you studied for a degree in building surveying,
 9 which I think you completed in 2005; is that right?
 10 A. I did, yes.
 11 Q. Where did you undertake that study?
 12 A. That was at the University of Salford.
 13 Q. I think you say that you had experience working in the
 14 building control departments at Lancaster Council for
 15 18 months.
 16 A. Yes.
 17 Q. And then at Manchester City Council.
 18 A. That's correct.
 19 Q. I think you stayed at Manchester City Council for some
 20 six and a half years.
 21 A. Yes.
 22 Q. Then I think you moved to Exova in 2011.
 23 A. That's correct.
 24 Q. Right.
 25 Can I ask you: what post did you hold within the

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1 building control department of Manchester City Council?
 2 A. At Manchester I started as an assistant surveyor and
 3 then moved on to a full area surveyor.
 4 Q. Right. And how long were you in post as a full area
 5 surveyor?
 6 A. I think I moved into that post approximately 2007, 2008
 7 maybe.
 8 Q. Okay, so you had that role there for some three and
 9 a half to four years before moving to Exova?
 10 A. I would have to check the date, but it was quite soon
 11 after I started at Manchester.
 12 Q. When you worked there, were you a member of any
 13 professional bodies?
 14 A. Not until 2008, when I joined the RICS.
 15 Q. You joined the RICS in 2008?
 16 A. Yes.
 17 Q. Are you still a member of the RICS?
 18 A. I am, yes.
 19 Q. At paragraph 2 of your statement -- if we could have
 20 that up, please, it's {EXO00001590/2} -- you say that
 21 your work in the Manchester building control department
 22 included reviewing building control approvals
 23 applications for a variety of Building Regulations
 24 processes. That's correct, is it?
 25 A. It is.

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1 Q. Can we take it that you became very familiar with
 2 building control approvals processes, at least prior to
 3 the time you left in 2011 and went to Exova?
 4 A. Yes.
 5 Q. Can we also take it that you became very familiar with
 6 the Building Regulations and the related approved
 7 documents?
 8 A. Yes.
 9 Q. Did you specialise in fire safety as a building control
 10 officer?
 11 A. No, I didn't specialise until I moved to Exova.
 12 Q. I see. Did you have some experience of or exposure to
 13 fire safety when you were working at building control?
 14 A. Yes.
 15 Q. Right.
 16 Can I take it that you were or became familiar with
 17 Approved Document B?
 18 A. Yes.
 19 Q. Thank you.
 20 Now, if you look at paragraph 2.3 of your statement,
 21 towards the top of page 2, you say in the second
 22 sentence:
 23 "While employed by Exova I have obtained a Master of
 24 Science degree in Fire and Explosion Engineering from
 25 the University of Leeds."

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1 When did you complete that degree?
 2 A. 2015.
 3 Q. So while you were working at Exova?
 4 A. Yes.
 5 Q. I see. Was that a part-time course or a full-time
 6 course?
 7 A. It was part-time over three years.
 8 Q. Now, at the time of your involvement in the
 9 Grenfell Tower project, which was the summer of 2012,
 10 were you based in Exova's offices in Warrington?
 11 A. I was.
 12 Q. Was that your permanent place of work?
 13 A. Yes.
 14 Q. Right.
 15 At the time of your work on the Grenfell project in
 16 that year, I think you were a senior consultant at
 17 Exova; is that right?
 18 A. That's correct.
 19 Q. You're now, I think, a principal consultant at Exova;
 20 yes?
 21 A. I left the company last April, but I was a principal
 22 before leaving.
 23 Q. I see. When were you appointed a principal within
 24 Exova?
 25 A. I would have to check the dates, but I think it was

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1 2015, maybe early 2016. It's in that six-month period
 2 after graduating, I was made principal.
 3 Q. Yes, I see, okay.
 4 Can you tell us where you work now, please?
 5 A. I work in Lancaster for an approved inspector company.
 6 Q. Right. So essentially in building control?
 7 A. In building control, yes.
 8 Q. Now, can you just help us understand the hierarchy of
 9 positions within Exova? So, for example, when you were
 10 a senior consultant, who would you be directly
 11 answerable to?
 12 A. So the structure was essentially there was a senior
 13 consultant, above that there was a principal consultant,
 14 and then associate, and then director. So I was
 15 answerable to anybody who was above me, really, in
 16 the --
 17 Q. I see. Okay.
 18 Who would be junior to you?
 19 A. Consultant engineers and graduates.
 20 Q. I see, okay.
 21 Can you explain what your role as a senior
 22 consultant at Exova typically involved?
 23 A. Typically it was looking at designs for fire safety
 24 where there may be slight variation or variations from
 25 Approved Document B or other guidance where

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1 an alternative approach might be desired.
 2 Q. I think you were certified under Exova Warringtonfire's
 3 fire risk assessor certification scheme, or FRACS,
 4 weren't you?
 5 A. Yes.
 6 Q. I think you had certificate number FRA24 --
 7 A. I think so.
 8 Q. -- first issued on 7 August 2012.
 9 A. Okay.
 10 Q. Is that --
 11 A. That sounds about right, yes.
 12 Q. We have a document to that effect .
 13 A. Okay.
 14 Q. Perhaps I'll show it to you, just so you can confirm it .
 15 It is {INQ00011331}, please. Can you identify that as
 16 your FRACS certificate issued on 7 August 2012?
 17 A. Yes, yes.
 18 Q. Yes?
 19 A. Sorry, yes.
 20 Q. Okay, thank you.
 21 In order to obtain that certification , did you have
 22 to be assessed?
 23 A. Yes, I did.
 24 Q. Who by?
 25 A. The assessors were external to Warringtonfire, so they

25

1 brought in people who were -- who dedicated -- it was
 2 an independent assessment, if you will , from Exova.
 3 I can't remember the names of the guys that were there.
 4 I think one of the assessors was an ex-fire and rescue
 5 chief, kind of high-level fire service at Manchester.
 6 Q. Right.
 7 A. A guy called Andy Howard.
 8 Q. Right.
 9 A. Who was --
 10 Q. Who chose the assessors to conduct that assessment?
 11 A. I don't know.
 12 Q. I mean, was it an Exova choice as to who to go to to
 13 conduct it or was there a system?
 14 A. I don't know.
 15 Q. What did they assess you on, do you remember?
 16 A. They assessed me on general fire safety design, the
 17 Regulatory Reform Order, and various risk assessment
 18 approaches.
 19 Q. Did they assess you on ADB or the Building Regulations
 20 more generally?
 21 A. Not specifically to the Building Regulations, that's
 22 part of a larger package of fire safety knowledge you
 23 would be expected to have to be FRACS registered.
 24 Q. Did you actually look at ADB and the Building
 25 Regulations more generally as part of your Master's?

26

1 A. ADB and the Building Regulations are kind of the
 2 baseline, if you will . They are deemed to satisfy --
 3 the approved document is deemed to satisfy the
 4 regulations . We looked at it , but the degree was more
 5 technical in terms of the engineering side of things .
 6 Q. I follow .
 7 Just one more question on this document. You can
 8 see that the certificate was issued on 7 August 2012.
 9 How long before that date, do you remember, did you
 10 undertake the assessment?
 11 A. I don't know, I can't recall .
 12 Q. Okay.
 13 I'm now going to turn to your role at Grenfell in
 14 the project .
 15 If you look, please, at paragraph 3.3 of your
 16 statement on page 2 {EX000001590/2}, you say that
 17 Clare Barker, a principal consultant at Exova, tasked
 18 you with producing the existing fire safety strategy, or
 19 the existing FSR, we can call it , for the Grenfell Tower
 20 building .
 21 A. Yes.
 22 Q. Can you remember when you received that instruction?
 23 A. It will have been in the early August, I think, or late
 24 July of 2012.
 25 Q. Right.

27

1 A. I can't remember a specific date.
 2 Q. Now, your draft existing fire safety strategy, which we
 3 will look at in some detail shortly, was dated
 4 16 August 2012. Do you remember, even roughly, how long
 5 before that you remember being instructed by Ms Barker
 6 to produce it?
 7 A. It was a small amount of time. I remember it was
 8 quite -- we were asked to produce a document under
 9 fairly short order. I think it was a matter of three,
 10 maybe four weeks.
 11 Q. I see.
 12 A. So that's as accurate as I can be, I'm afraid .
 13 Q. All right . Let's look at some documents.
 14 First , please, can you be shown {EX000001613}. If
 15 we look at the top email and then the second one down on
 16 page 1, the top email is an email to you from Dr Barker,
 17 Clare Barker, on 7 August 2012. Do you see that?
 18 A. Yes.
 19 Q. She sent you, it seems, some documents. You see the
 20 attachments? Underneath that, she said "See below", and
 21 underneath that, the below email is from Bruce Sounes at
 22 Studio E on 30 July 2012 to Clare Barker, and he says:
 23 "Dear Clare,
 24 "I wanted to thank you for coming to the Project
 25 Meeting last Thursday. I appreciate it can seem like

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1 you occupy a very small part of the agenda and therefore
 2 an expensive use of your time but Thursday was the first
 3 time since May that we've managed to assemble the whole
 4 team, including the client and the contractor and it was
 5 an invaluable briefing for everyone. I would not expect
 6 to need another meeting with Exova before we submit for
 7 Planning, and possibly not again until we're in
 8 negotiation with Building Control.

9 "Please see attached the specification for the smoke
 10 exhaust/ventilation to the residential lobbies.

11 "We are more than happy to continue working with you
 12 in Warrington, but if someone else in London is going to
 13 pick it up we would like to know as soon as possible.
 14 Please could you get back to me?"

15 I have read you the full email just to try and
 16 prompt your recollection.

17 It looks from this that your first involvement is
 18 this email from Clare Barker to you on 7 August
 19 attaching the documents and forwarding Mr Sounes' email
 20 of 30 July; is that right, do you think?

21 A. It seems to be right, yes.

22 Q. Right. So can we proceed on the basis that this date,
 23 7 August, was the first time that you became involved?

24 A. Yes.

25 Q. Okay.

1 What was the context in which Dr Barker sent you
 2 this email?

3 A. Dr Barker asked me to prepare a draft report for the
 4 existing building, and essentially to start the process
 5 of the existing fire safety strategy. At the time,
 6 Clare actually sat adjacent to me, so we will have
 7 discussed, you know, the parameters for that and the
 8 information that we might have had. But that's
 9 essentially how it started.

10 Q. So she sent you this email on the 7th with virtually no
 11 information in it other than what was attached, so was
 12 there a conversation between you and Dr Barker on or
 13 prior to 7 August before this email was sent to you?

14 A. I would imagine so, though I can't recall any specific
 15 conversations at that time.

16 Q. I see.

17 Did she give you a document when she first asked you
 18 to prepare the existing fire safety strategy which set
 19 out what she wanted you to do?

20 A. I don't recall specific documents from that time.

21 I know that the information that I had was very limited,
 22 so I contacted the architects myself.

23 Q. Right. Okay. Well, we will come back to that in
 24 a minute. Can we just proceed through the documents and
 25 see how we go.

1 Could you please be shown {EX00001618}. This is
 2 an email from Bruce Sounes to Clare Barker on 30 July.
 3 The second one down is the email I've just shown you,
 4 which relates to the specification to the smoke exhaust
 5 and ventilation to the residential lobbies. We have
 6 just looked at that.

7 Now, let's look at her response to Bruce Sounes the
 8 same day, at the top, 30 July 2012. Do you see that?

9 A. I do.

10 Q. "Good afternoon Bruce."

11 Then just looking at the third paragraph, if we
 12 can -- we may come back to the second one, but looking
 13 at the third one -- she says:

14 "In terms of allocating resources to this project
 15 I am happy to work on the fire strategy for the existing
 16 Grenfell Tower from the Warrington office and will aim
 17 to get the report to you before the deadline of the 16th
 18 August."

19 You see that?

20 A. Yes.

21 Q. I'll come back to deadline in a moment, because I want
 22 to ask you a question about that. Before I do, I just
 23 want to show you another document a little bit later.

24 Can you please go back to the document we were
 25 looking at before, {EX00001613}. This is the email

1 where she sent you the first of the emails of 30 July,
 2 namely Bruce Sounes' email to Dr Barker, but not her
 3 response back to him. We looked at that a minute ago.
 4 So you have got, I think, all the documents I need you
 5 to see.

6 My question is: what information or briefing did
 7 Dr Barker give you other than what is set out in the
 8 email from Mr Sounes to Dr Barker and the attachments to
 9 the email to you from Dr Barker?

10 A. Other than the information that's already attached to
 11 the email, I don't recall. I do recall reading
 12 a document in relation to the ventilation which was
 13 a proposed document, but other than that, I don't recall
 14 reading anything more specific. So I would say I don't
 15 recall particular documents from that time.

16 Q. Do you remember whether Dr Barker sent you her response
 17 to Bruce Sounes of 30 July which we have just looked at,
 18 which said that she would provide the report by the
 19 deadline of 16 August?

20 A. I can't recall whether she sent me the email. I do
 21 recall that there was a deadline.

22 Q. When did she tell you that, do you think?

23 A. I would be -- I would be guessing, but I would assume
 24 that it was at that time -- around that time that she
 25 passed over the work.

1 Q. Right, I see.
 2 Did she tell you why there was a deadline of
 3 16 August?
 4 A. Not that I can recall, no.
 5 Q. Right.
 6 Did you feel that you were under some kind of
 7 pressure of time to produce the fire strategy that
 8 Dr Barker had asked you to do?
 9 A. I suppose it became the priority at that time. In terms
 10 of pressure, not specifically -- not particularly, no
 11 more than I would normally feel.
 12 Q. Can I ask you then to go back to the email we looked at
 13 a minute ago, {EXO00001618}. We can see from
 14 Dr Barker's email to Bruce Sounes dated 30 July at 3.28,
 15 namely the top one on that page -- I showed you the
 16 third paragraph, but if we look at the second paragraph,
 17 she says:
 18 "With regard to the two fee proposals that were
 19 issued by Exova, we have received an email today from
 20 David Hale at Appleyards accepting the fees for the
 21 upgrade of the building [and she gives a reference].
 22 I telephoned him to tell him that he had accepted the
 23 wrong fee and he is going to email us the right fee
 24 acceptance to us tomorrow, so once that arrives we can
 25 get started."

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1 Do you see that?
 2 A. I do.
 3 Q. You may not have seen this email at the time, Ms Cooney,
 4 but did you know who Appleyards were?
 5 A. I didn't.
 6 Q. Who did you think was the client for the purposes of the
 7 report which Dr Barker had asked you to prepare?
 8 A. The architectural practice, Studio E.
 9 Q. Studio E?
 10 A. Yes.
 11 Q. Did you think they might have a client, a lay client?
 12 A. Yes. I would have -- there would have been a longer
 13 chain, yes, but the contact that I was given was with
 14 Studio E.
 15 Q. Right. Did you take any steps ever to find out who
 16 Studio E's client was?
 17 A. No, not that I recall. No.
 18 Q. Would it not be important to you to know that?
 19 A. At that particular time, then I -- whether it was one
 20 client or another client would not be material to my --
 21 at this time. But once we actually got into the work
 22 itself, then I was aware that KCTMO were the client.
 23 Q. I follow. Do you remember when that was or how far into
 24 the work that was?
 25 A. It would have been shortly after we started. So it was

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1 gathering information, essentially, so I would have been
 2 aware then.
 3 Q. Yes, I see.
 4 When we come to look at the existing fire safety
 5 strategy which you drafted, we can see that the client
 6 at the bottom of each page is KCTMO, or Kensington and
 7 Chelsea TMO, to be accurate. To be clear, that was, was
 8 it, your understanding throughout the time you were
 9 actually preparing the report?
 10 A. Yes, I was working with Studio E, yeah.
 11 Q. I see.
 12 Within Exova, whom did you report to during the time
 13 you did the work?
 14 A. Dr Barker.
 15 Q. Anybody else?
 16 A. At the time, no. Not that I recall.
 17 Q. You say, "At the time, no". That rather suggests there
 18 might have been another time.
 19 A. So it was quite a short period of time. So with it
 20 being in the middle of the holiday season, there were
 21 staff on holiday, so I will have -- I will have gone
 22 back to Clare on various items. I don't recall speaking
 23 to anybody else other than members of staff in the
 24 London office about it. So James ... I don't recall
 25 speaking to Mr Ashton, but I may well have done.

35

1 Q. Right. You mentioned James a moment ago. Is that
 2 James Lee?
 3 A. It is, yes.
 4 Q. We will come to look at his involvement shortly.
 5 Can I take you back, please, to your witness
 6 statement and go to page 2 {EXO00001590/2}. Shall we
 7 look together, please, at paragraph 3.
 8 You say in the second sentence that you were based
 9 in the Warrington office, and you say you believe you
 10 were chosen to carry out the work in the Warrington
 11 office because the London office was not able to
 12 resource it at the time because of its workload. Do you
 13 see that?
 14 A. Yes.
 15 Q. Was it at the time unusual within Exova to have
 16 consultants prepare fire safety strategy reports for
 17 projects that were not geographically close by?
 18 A. Yes, there was quite a lot of office interworking, but
 19 I think this particular project came to Warrington
 20 because of the time of year, with members being on --
 21 Q. So can we take it from that answer that normally the
 22 London office would have done this report?
 23 A. Yes.
 24 Q. Yes.
 25 Did Exova have any internal policies or guidelines

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1 at this time which guided staff in positions such as
 2 yours as to how to carry out a fire strategy report for
 3 an existing building?
 4 A. I'm not -- I don't know of one for that specific type of
 5 work. They were more generic than that, so it would
 6 have been for a fire safety strategy generally.
 7 Q. I see, so there was a policy or guidance within Exova
 8 for doing fire strategy reports, just not for existing
 9 buildings?
 10 A. That's right.
 11 Q. Yes, I see.
 12 What about guidance for the obtaining of information
 13 from the building owner or responsible person?
 14 A. Not that I am aware of.
 15 Q. Okay.
 16 How much experience of preparing fire safety
 17 strategy reports for existing buildings did you have
 18 prior to doing the one you did for Grenfell Tower in
 19 August 2012?
 20 A. In the format of a fire safety strategy, I wouldn't be
 21 able to give you a number. A small number of existing
 22 fire strategies within the workload that I had done
 23 since joining Exova.
 24 Q. Right. So you had done some before?
 25 A. I think so, yes.

1 Q. Had you ever done a fire safety strategy report for
 2 a high-rise residential block?
 3 A. I don't know, is the answer. I would be surprised if it
 4 was -- if I hadn't, but I haven't checked.
 5 Q. Right.
 6 At the time you were given the role by Dr Barker,
 7 what CPD or other professional development had you done
 8 to guide you on carrying out the Grenfell Tower
 9 instruction?
 10 A. In terms of CPD, it's a process of many years of
 11 development, with refreshers through the CPD, rather
 12 than learning just as a module. Obviously having worked
 13 in the industry for a number of years, and in quite
 14 a densely populated urban environment in Manchester,
 15 I was involved with both looking and assessing and
 16 inspecting a number of residential buildings, a number
 17 of those over 18 metres.
 18 Q. I follow.
 19 Would you agree with this proposition: a fire safety
 20 engineer sets the agenda regarding the life safety
 21 requirements for a project?
 22 A. I probably wouldn't couch it in that way. I would say
 23 that the regulations set the agenda, and for a building
 24 such as this, it's really making sure that the principal
 25 elements, the key elements, are present and that the

1 design meets with the guidance.
 2 Q. Would you agree with this proposition: standard-setting
 3 is a key component of the work needed from a practising
 4 fire safety engineer?
 5 A. Could you --
 6 Q. Yes. Standard-setting is a key component of the work
 7 needed from a practising fire safety engineer?
 8 A. Yes.
 9 Q. You do.
 10 Can I look briefly with you, please, at precisely
 11 what a fire safety strategy is. This may seem a rather
 12 simplistic question, but let me try it anyway.
 13 Can I ask you, please, to be shown {BSI00001716}.
 14 Now, this is a British Standard published document,
 15 PD 7974, from 2002 entitled:
 16 "Application of fire safety engineering principles
 17 to the design of buildings -- Part 0: Guide to design
 18 framework and fire safety engineering procedures."
 19 Do you see that?
 20 A. Yes.
 21 Q. Are you familiar with this document?
 22 A. I am.
 23 Q. Were you familiar with it, do you think, in August 2012?
 24 A. Yes.
 25 Q. Right.

1 Let's look, then, at paragraph 3.16 on page 7
 2 {BSI00001716/7}, please. This defines, if you look at
 3 the top of the page, a fire safety strategy as a:
 4 "Combination of fire safety measures that has been
 5 shown by reference to prescriptive codes or a fire
 6 engineering study to be capable of satisfying the
 7 specified fire safety objectives."
 8 Do you see that?
 9 A. Yes.
 10 Q. Does that reflect your understanding of what a fire
 11 safety strategy was as at August 2012?
 12 A. Yes.
 13 Q. And it reflects your understanding as at that time, does
 14 it?
 15 A. Yes.
 16 Q. Yes.
 17 Now, let's look at page 44 {BSI00001716/44}, please,
 18 which is part 9.7 on page 44 itself.
 19 That says, towards the top of page 44:
 20 "Fire safety strategy.
 21 "The fire safety strategy for the building will be
 22 based on the successful trial design and is likely to
 23 comprise a range of physical fire safety measures and
 24 management procedures. A description of these measures
 25 should be provided, together with performance

1 specifications and any recommended deviations from the
2 relevant system codes ...”

3 Does that reflect your understanding as it was at
4 August 2012?

5 A. Yes. It’s a very all-encompassing definition, and the
6 range of work that goes into fire safety strategies is
7 bespoke to a particular building. So if I could give
8 you an example, a building which has no management
9 presence but may have ad hoc visits, such as a high-rise
10 residential, the management procedures are important,
11 but in terms of the fire safety design of the building,
12 they are kind of overlapping but separate.

13 Q. I see. I see.

14 Can I ask you to look at page 10 {BSI00001716/10},
15 then, please, which is back in the document earlier on.
16 Let’s go to paragraph 4.3.6, at the foot of the page.
17 It says:

18 “The accuracy of many FSE calculations is unknown.”
19 That’s a quotation, because it is one of a number of
20 common misconceptions which you can see the title of
21 a third of the way down that page, 4.3. Do you see
22 that?

23 A. Yes.

24 Q. One of the common misconceptions is the accuracy of many
25 FSE calculations is unknown. Then it goes on to say:

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1 “The accuracy of the calculation procedures
2 presented in the PDs supporting BS 7947:2001
3 [et cetera] ... will generally be sufficiently accurate
4 for engineering design purposes if they are used within
5 their limits of applicability.”

6 Then this:

7 “However, the old adage of ‘garbage in-garbage out’
8 applies and, in most cases, uncertainties in the
9 calculation procedures will be outweighed by any errors
10 in the initial assumptions (eg the rate of fire
11 growth).”

12 Were you conscious in August 2012 of that principle
13 in general terms?

14 A. In general terms, I was. The PD 7974 series of
15 documents, which this is one of, are more on the, shall
16 we say, engineering calculation side of fire
17 engineering, whereas the codes are more on the
18 fire safety guidance side, if you will. So there is
19 a slight -- there’s quite a large difference between the
20 two.

21 Q. Yes, I follow that. But in general terms, can we take
22 it that the general principle -- garbage in, garbage
23 out -- and what that means was something that you would
24 have had in mind when preparing your existing fire
25 safety strategy report for Grenfell Tower?

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1 A. It’s not something I would have had in mind because we
2 didn’t use fire safety engineering principles for the
3 strategy. So fire safety engineering using these codes
4 used specific empirical calculations to work things out,
5 like the rate of fire growth or the safe time for
6 evacuation, et cetera, et cetera, whereas
7 a guidance-based approach wouldn’t go into the
8 calculation side of things.

9 Q. Yes, I see.

10 A. So there’s no -- there are no garbage in, garbage out
11 kind of parameters for it, because you’re not actually
12 carrying out calculations as such for the vast majority
13 of the work, it’s guidance-based. So ADB-based,
14 essentially.

15 Q. But where guidance required you to make calculations --

16 A. If I would have done, yes, then I would have been aware
17 of that for --

18 Q. Can I take you to the FIA or Fire Industry Association
19 guidance note which addresses it’s scope of work for
20 a fire engineer. That’s {INQ00011219}, please.

21 Are you familiar with this document?

22 A. I am, yes.

23 Q. Now, to be fair to you, this is a document that was
24 produced by the FIA in May 2015 --

25 A. It was, yes.

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1 Q. -- which was towards the end of Exova’s overall
2 involvement with the Grenfell Tower project, and
3 three years or so -- perhaps two and a half years or
4 so -- after your involvement in the existing
5 fire strategy for the building, to put it in time
6 context, but you are familiar with it.

7 Have you read it before?

8 A. I have read it. I’ve not read it cover to cover, but
9 I am aware of the document.

10 Q. Okay.

11 Would you accept that the FIA guidance note reflects
12 common practice in the construction industry before
13 May 2015?

14 A. It’s much more structured. No, would be the answer.

15 Q. No? Right.

16 A. It’s one way of following guidance, I suppose.

17 Q. I see, okay. Let’s see how we go with this.

18 Can I ask you to turn to page 4 {INQ00011219/4} of
19 this FIA guidance. Under “General”, you can see it
20 says:

21 “The fire engineer’s overall role will be to provide
22 advice in relation to the fire safety aspects of the
23 design in order to provide reasonable confidence that
24 the design that is developed, as well as the completed
25 building, should achieve an acceptable standard of fire

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1 safety, comply with the client's objectives and meet all
 2 relevant legal fire safety requirements."
 3 You see that?
 4 A. Yes.
 5 Q. Would you agree that, as at August 2012, this was
 6 an accurate summary of the overall role of a fire
 7 engineer?
 8 A. Yes.
 9 Q. Can I invite you just also to consider: would the
 10 contents of this document as a whole reflect good
 11 practice or best practice, perhaps, of a fire safety
 12 engineer as at August 2012?
 13 A. I would say it was best practice.
 14 Q. Best practice.
 15 Can I ask you to look at page 4 at the bottom. That
 16 sets out some bullet points; do you see?
 17 A. Yes.
 18 Q. It says:
 19 "The fire strategy should cover all relevant
 20 fire safety design issues, in particular ..."
 21 And then there are seven of them:
 22 •" Design, location and protection of escape routes.
 23 •" Identification and specification of all fire
 24 safety systems that are required.
 25 •" Surface spread of flame requirements for surface

1 materials.
 2 •" Structural fire resistance requirements.
 3 •" Fire compartmentation requirements including
 4 fire-stopping and cavity barriers.
 5 •" External fire spread.
 6 •" Access and facilities for fire services."
 7 Looking at that list, and recognising that you
 8 weren't preparing the fire strategy for the
 9 refurbishment works, Ms Cooney -- we understand that
 10 entirely -- would you accept that any fire strategy for
 11 a building as existing would need to cover all of those
 12 elements?
 13 A. Yes, they are the standard B1 to B5 requirements of the
 14 Building Regulations, so ...
 15 Q. Yes.
 16 Would you agree that a fire strategy for a building,
 17 an existing building, is an important source of
 18 narrative information about how to keep people in that
 19 building safe in accordance with the RRO, the
 20 Regulatory Reform (Fire Safety) Order?
 21 A. I think it's part of the job. It really depends on the
 22 focus, I suppose. The existing fire safety strategy
 23 focuses on the design of the building, and brings in
 24 a sufficient amount of management so that the building
 25 can be appropriately used. So in general I would agree,

1 but with some caveats.
 2 Q. Right. I'm just trying to understand the caveats.
 3 You say, "I think it's part of the job and depends
 4 on the focus". Can you just explain to me again what
 5 the caveats are?
 6 A. So obviously every building is different, and every
 7 strategy that is written has its own bespoke
 8 requirements. When you're looking at an existing fire
 9 safety strategy for a building that has been up for
 10 a time which pre-dates modern-day guidance, then there
 11 is some assessment that you need to consider to see
 12 whether you're meeting those objectives or not, and that
 13 kind of would change the emphasis in certain parts more
 14 than in another document for an existing fire safety
 15 strategy. It depends on the building, essentially.
 16 Q. I see. Does that mean -- and correct me if I have
 17 misunderstood your evidence -- that where the existing
 18 building doesn't meet modern-day guidance, then that's
 19 something that the building owner should understand and
 20 know about and take into account when formulating
 21 a strategy to comply with the RRO?
 22 A. I think --
 23 Q. I don't want to put words in your mouth, but I just want
 24 to understand your evidence.
 25 A. I think when the strategy is retrospective, so we're

1 looking at an existing structure and existing conditions
 2 within a building, absolutely they need to understand if
 3 those conditions are not safe or don't meet the
 4 threshold, if you will, the benchmark of modern
 5 guidance. However, it's not just a gap analysis between
 6 how it was constructed and what would today be
 7 acceptable; it's is that condition safe, effectively.
 8 Q. I see.
 9 Would you also agree that the fire strategy is the
 10 primary and definitive source for the specification of
 11 the relevant performance criteria that would enable
 12 a building to be demonstrated as complying with part B
 13 of the Building Regulations?
 14 A. Yes, I would agree, insofar as those performance
 15 requirements are high level.
 16 Q. Right. When you say "are high level", what sort of
 17 performance requirements would not be high level, which
 18 would mean that you wouldn't have to or wouldn't be able
 19 to enable a building to be demonstrated as compliant
 20 with part B?
 21 A. So taking the existing fire safety strategy, where
 22 elements aren't known or certain materials or
 23 construction methods, et cetera, aren't evident, then it
 24 wouldn't be wise to, you know, look at particular
 25 elements individually within the building, different

1 materials, but as a specification under
 2 British Standards, for example, then that's the kind of
 3 level I'm talking about when I talk about high level.
 4 We wouldn't go into NBS standards and things like that
 5 to specify things for a fire safety strategy.
 6 Q. No. But just so I understand, where you thought that
 7 an element was unknown or where that element needed to
 8 comply with the Building Regulations, would you point
 9 that out to the client normally in your report?
 10 A. Yes.
 11 Q. Would you also agree that a retrospective fire strategy
 12 for an existing building provides an opportunity for the
 13 client to investigate fully the current condition of the
 14 building and the guidance or regulations to which it was
 15 originally designed in order to provide a qualitative
 16 and also a quantitative risk assessment of the fire
 17 risks that might result from any differences between the
 18 original design and the current guidance?
 19 A. I would agree generally. I wouldn't agree that it is
 20 a fire risk assessment. That's something quite
 21 separate, in my understanding.
 22 Q. Would you agree also that a retrospective fire strategy
 23 such that I have just asked you about would allow the
 24 person who was responsible under the RRO to understand
 25 their building thoroughly and thereby know what general

1 fire precautions might be required in order to comply?
 2 A. When we're looking at a building from a point of view of
 3 the design, that's what would be understood by the
 4 client. I think if we then go into management and other
 5 types of elements within that, it's kind of becoming
 6 a hybrid between a fire risk assessment and a fire
 7 safety strategy, which isn't a typical fire safety
 8 strategy, really. It focuses on the design of the
 9 building rather than a risk assessment, which would look
 10 at the building in use, et cetera.
 11 Q. I see.
 12 Just on that, can we take it that in order to
 13 prepare a full and proper existing fire safety strategy,
 14 you would need to understand and have read the most
 15 up-to-date fire risk assessment for the building?
 16 A. It's one of the documents that we would require, yes.
 17 Q. Yes.
 18 Can I then turn to a slightly different topic, which
 19 is the fee proposal and the scope of work, which is at
 20 {TMO10037721}, dated 11 June 2012.
 21 Now, you can see that this is an Exova document sent
 22 to Mr Sounes at Studio E on 11 June 2012. Have you seen
 23 this document before?
 24 A. Yes.
 25 Q. If you go to page 3 {TMO10037721/3}, you will see that

1 it's signed by James Lee, consultant at Exova, and was
 2 reviewed by Terry Ashton, associate. You see that?
 3 A. Yes.
 4 Q. Can I ask you to go back to page 1 {TMO10037721/1} and
 5 look at the project brief, then, please. It says
 6 underneath "Project Brief":
 7 "The Grenfell Tower is an existing residential
 8 building in London. Exova Warringtonfire has been
 9 invited to produce a fire safety strategy report for the
 10 existing condition of the building. This fee proposal
 11 covers the production of a review of the existing fire
 12 safety arrangements for the building."
 13 Do you see that?
 14 A. Yes.
 15 Q. If you look a little bit further down, you see there is
 16 "Company Profile". Then on page 2 {TMO10037721/2} you
 17 can see there is "Proposed Scope of Work". We will come
 18 back to that in a moment.
 19 Before I do, can I take you into your statement, and
 20 look at paragraph 3.4 on page 2 {EXO00001590/2}. You
 21 say there at 3.4:
 22 "I do not recall whether I saw the fee proposal at
 23 the time, though I note that it covers: (1) Means of
 24 escape; (2) fire safety systems, (3) any smoke
 25 ventilation provided; and (4) access and facilities for

1 the Fire Service."
 2 You see that?
 3 A. Mm-hm.
 4 Q. Doing the best you can, when do you think that you first
 5 saw this document? If you want me to put it back up on
 6 the screen, I'm happy to do that.
 7 A. No. Obviously I've seen these documents as part of
 8 the ... preparing for the Inquiry and discussing with
 9 solicitors post-fire. I don't recall seeing it at the
 10 time.
 11 Q. Right.
 12 A. I'm not sure when I first saw it. Perhaps around the
 13 witness statement time.
 14 Q. If you hadn't seen it at the time, how would you know
 15 what was being asked of you by Dr Barker?
 16 A. I was asked to do an existing fire safety strategy on
 17 an existing high-rise residential building with some
 18 documentation. Clare sat adjacent to me, so we will
 19 have had discussions around what was expected at the
 20 time. I just -- it's so long ago, I can't recall the
 21 content of --
 22 Q. Right.
 23 A. I can guess at it, but I don't recall specific
 24 conversations at that particular time. But certainly we
 25 will have discussed what was required.

1 Q. Right.
 2 If you hadn't seen it at the time, can you help me,
 3 how would you have known what the scope of the work was
 4 for the report that you were to produce?
 5 A. Again, I'm assuming here that it was laid out in -- from
 6 Clare and in the documents, which were to start to
 7 inform the process of preparing the document -- the
 8 strategy itself .
 9 Q. Did you ask Dr Barker to give you the fee proposal that
 10 contained the scope of work so you could see in black
 11 and white what it was?
 12 A. I don't recall .
 13 Q. Right.
 14 A. I genuinely don't.
 15 Q. At the time, how would you have normally been told the
 16 scope of work for a report that you had been instructed
 17 to prepare?
 18 A. Typically, we would sit down and go through the project,
 19 essentially, of what was being done, so that's gathering
 20 all the information and looking at -- looking how we're
 21 going to actually set out the works and what we needed
 22 to do to do that.
 23 The fee proposal in some instances, yes, that
 24 provides a baseline, but obviously you build on that
 25 kind of understanding from looking at the project

1 documentation as well.
 2 Q. Now, you say, "Typically, we would sit down and go
 3 through the project, essentially, of what was being
 4 done". Was that done on this occasion with Dr Barker?
 5 A. I would assume so, considering the lack of emails,
 6 et cetera, that there is, and the fact that Clare sat
 7 adjacent to me. So -- but I genuinely don't recall the
 8 contents of conversations. I know that we will have had
 9 them.
 10 Q. Yes.
 11 A. We worked quite closely together on several projects, so
 12 that's ... that was our usual --
 13 Q. So, again, doing the best you can with your
 14 recollection -- and I don't want to put words in your
 15 mouth -- do you recall anything of her explaining the
 16 scope of the project to you?
 17 A. Yes, I -- yes, I know we had conversations about it,
 18 I just don't recall the specific content of them,
 19 you know, as a ... I know we discussed various matters,
 20 but I couldn't recall very specific -- it's too long
 21 ago.
 22 Q. At any rate, you don't recall being shown the fee
 23 proposal?
 24 A. No, I don't.
 25 Q. Right.

1 Now, staying with paragraph 3.4 of your statement,
 2 you go on to say:
 3 "I was not involved in deciding on this scope, but
 4 it is a basic standard agenda to include in
 5 a fire strategy report for an existing building. Each
 6 item would be broken into a number of sub-issues,
 7 depending on the nature of the building which was being
 8 reported on."
 9 What would the specific sub-issues be for
 10 a residential high-rise building?
 11 A. So it would be broken down, essentially, into the five
 12 key elements of fire safety regulation. So,
 13 for example, we would look at travel distances,
 14 compartmentation, firefighting facilities, and that
 15 would include firefighting stairs, dry risers, lifts,
 16 et cetera. Then within the compartmentation side of
 17 things, we would look at things like cavity barriers and
 18 requirements for various separations in the building,
 19 lobbies, et cetera.
 20 Q. Right.
 21 If you go to page 2 of the fee proposal, please,
 22 which is back at {TMO10033721/2}, can you see, "The
 23 scope of the work for the project would include"? Do
 24 you see that there?
 25 A. Yes.

1 Q. A site visit, and then the compilation of a fire safety
 2 strategy report. You see that?
 3 Then a few paragraphs down -- in fact, the
 4 last-but-one paragraph before "Fire Engineering Team",
 5 it says:
 6 "In developing the report, we would use our expert
 7 knowledge of fire safety design codes. The report for
 8 the building will consider the following items:
 9 •" means of escape;
 10 •" fire safety systems;
 11 •" any smoke ventilation provided;
 12 •" access and facilities for the Fire Service."
 13 You see that?
 14 A. Yes.
 15 Q. Would those be included in your basic sub-issues?
 16 A. Yes.
 17 Q. Did you, when you did your work, check that you had
 18 covered all of those?
 19 A. In as far as I was able to do so with the information we
 20 had at the time. The document that we produced was only
 21 a draft, so there will have been extra things to put in.
 22 But at the time, yes, I think they were generally
 23 covered.
 24 Q. So when in your statement you refer to "It is a basic
 25 standard agenda to include in a fire strategy report for

1 an existing building”, are you referring to those four
2 bullet points as the basic standard agenda?

3 A. Yes.

4 Q. I see.

5 So were you, do you remember, content to proceed to
6 draft the fire safety strategy without seeing the fee
7 proposal because you were confident that the basic
8 standard agenda had been set out in it and that’s what
9 you would follow?

10 A. I would presume so, yeah.

11 Q. But you can’t recall?

12 A. I can’t recall directly, but yes, it --

13 Q. Fair enough.

14 I know you didn’t draft the proposal, and you may or
15 may not have seen it at the time of your work, you can’t
16 remember, so I bear that in mind, but I still want to
17 ask you one or two questions about it.

18 First, can I ask you to look at the proposed scope
19 of work on page 2, where we are, where it says under the
20 heading “The aim of the work”, do you see? It says:

21 “The aim of the work would be the production of a
22 retrospective fire safety strategy report for the
23 existing building. This report will serve to inform the
24 fire safety risk assessment and fire risk management
25 plan for the building. The design of the building will

1 be assessed against relevant design codes relating to
2 the statutory requirements on the design of the building
3 under the Regulatory Reform (Fire Safety) Order 2005,
4 and also under Section 20 of the London Building Acts
5 (Amendment) Act 1939 if the building falls within the
6 size criteria specified by that legislation.”

7 Now, I’ve shown you all of that because I have
8 a number of questions about it.

9 The first question is: can you explain to us what
10 you meant or what would have been meant by
11 a retrospective fire safety strategy report?

12 A. So retrospective being that it is based on an existing
13 building, so we are looking at the fire safety design
14 for a building that is already there.

15 Q. I see. When it says, “The report will serve to inform
16 the fire safety risk assessment and fire risk management
17 plan”, did you have in mind that this document that you
18 would produce would then be given by the building owner
19 to its own fire risk assessor in order to take forward
20 what had to be done to comply with the RRO?

21 A. Not entirely, no.

22 Q. So can you explain -- and, again, I know you didn’t
23 draft it -- what you would have understood, had you
24 looked at this document at the time, if you did, by the
25 words “serve to inform the fire safety risk assessment

1 and fire risk management plan for the building”?

2 A. When a fire strategy is done for a new-build, then the
3 purpose of the strategy really is to set out the
4 fire safety design and all the component parts of that
5 building as a new structure, and because at the end of
6 that construction process a fire safety risk assessment
7 would be required, it would then follow that -- it would
8 inform a fire safety risk assessment for a new-build.

9 However, with an existing building, where there will
10 already be a fire risk assessment, it is kind of
11 backwards, if you will, it’s retrospective, then I think
12 the fire safety risk assessment also informs the
13 fire safety retrospective strategy. So one serves to
14 support the other, really. They should really be saying
15 the same things.

16 Q. Right.

17 Would it be right, then, that you’re looking, in
18 doing your report, to assist the building owner in its
19 management plan as well as looking at any design
20 questions?

21 A. I think with an existing strategy, the focus is more on
22 the design, for -- so in the context of the Grenfell
23 strategy, it was really an informative piece of work to
24 look at the fire safety design of the building for the
25 design team rather than a holistic fire safety audit, if

1 you will, which would involve much more than just
2 compliance with the Building Regulations.

3 Q. Let’s just be a bit more focused in my question.

4 You see the sentence which I have just read to you,
5 the first sentence here, which refers to the fire risk
6 management plan. Whose fire risk management plan was
7 that?

8 A. It will have been for the end users, so the council.
9 KCTMO would be the fire risk --

10 Q. Right. Therefore, can we take it that your work was to
11 inform the KCTMO about its fire risk management plan?

12 A. I would disagree with that.

13 Q. Well, I just wonder why you disagree with that, given
14 that we can see that clearly stated in the sentence?

15 A. And I can see that. That wasn’t my understanding of the
16 work that I was carrying out. I mean, with all of these
17 kind of documents, there is certainly a ... an amount of
18 detail which is in these documents which can advise
19 building owners and risk assessors as to what is there
20 in the building and you use those documents in kind of
21 a joined-up way. So, as I said before, one would inform
22 the other.

23 It does -- I suppose, reading the sentence, you
24 inform the plan, but to a limited -- to a limited
25 degree, I would say.

1 Q. Right.

2 A. They need to take those fire risks from the fire risk

3 assessment along with the strategy to come up with their

4 fire safety management plan for the building. So it's

5 several documents would feed into that, really.

6 Q. Would I be right in thinking that Approved Document B

7 actually sets out regulatory guidance about building

8 management and not only about design?

9 A. It does, but in a very limited way.

10 Q. Right.

11 A. It's so that the building can be managed rather than --

12 whereas a fire risk assessment will go more into detail

13 on the management side of the detail, because it's

14 a building in use at the time rather than a design ...

15 a design guidance document, essentially.

16 Q. Going back to the sentence I've just read to you, does

17 it come as a surprise to you -- because I know you say

18 you can't remember reading this document --

19 A. Erm --

20 Q. Well, let me just ask the question. Does it come as

21 a surprise to you that the report was going to serve to

22 inform the fire risk management plan for the building?

23 A. It's not so much as a surprise, it's -- the paragraph

24 seems quite generic, to be honest. So the interlinked

25 nature of all these documents, yes, it would inform, but

1 it's not ... it's not something that would go into it in

2 great detail.

3 Q. Can I ask you, please, to turn to {CLG00000173/12}.

4 This is part of Approved Document B, you see under

5 "Definitions", on page 12, in the left-hand column at

6 0.13, do you see, Ms Cooney --

7 A. Yes.

8 Q. -- there is a title that says "Management of premises"?

9 I'm not going to read it all out to you, but it says in

10 the first part of it:

11 "This Approved Document has been written on the

12 assumption that the building concerned will be properly

13 managed.

14 "Building Regulations do not impose any requirements

15 on the management of a building. However, in developing

16 an appropriate fire safety design for a building it may

17 be necessary to consider the way in which it will be

18 managed. A design which relies on an unrealistic or

19 unsustainable management regime cannot be considered to

20 have met the requirements of the Regulations."

21 Then you can read the last paragraph as well, which

22 is about once the building is in use, the management

23 regime should be maintained, et cetera.

24 Were you familiar at the time with the principle

25 enshrined in that paragraph?

1 A. Yes.

2 Q. If that's the case, why would it come as a surprise to

3 you that the report that you were to draft would inform

4 the fire risk management plan for the building?

5 A. I suppose it's a misunderstanding on my part of the word

6 "inform". I mean, you design the building so that it

7 can be managed, but we wouldn't go into the same kind of

8 level of detail for that as you would in a fire risk

9 assessment. I think that's the point I was trying to

10 make.

11 Q. I see.

12 When you did your report, did you, just to get this

13 clear, expect that your work would inform the fire risk

14 management of the plan for the building?

15 A. Insofar as it is relevant to the fire safety design,

16 yes, I suppose it does, yes.

17 Q. Okay.

18 A. Yeah.

19 Q. Who did you expect would actually carry out the risk

20 assessment?

21 A. At that time, I had the fire -- well, I asked for the

22 fire safety -- the fire risk assessment, so it was

23 an ongoing assessment.

24 Q. Who did you expect would create or draft the fire risk

25 management plan for the building?

1 A. That's typically, you know, an end user, a responsible

2 person's role.

3 Q. So in this case, it would be the ...?

4 A. Sorry --

5 Q. In this case it would have been --

6 A. KCTMO, yes.

7 Q. Did you expect Studio E, who were, after all, giving you

8 instructions, to pass on your report or draft report --

9 we will come to that later -- to the end user, as you

10 describe them?

11 A. Yes.

12 Q. So did you understand that your report was intended to

13 assist the person responsible under the RRO to discharge

14 their duties under it?

15 A. I would have expected it to go back to the client, yes,

16 so that they could use it.

17 Q. And also compliance with section 20 of the London

18 Building Acts (Amendment) Act 1939?

19 A. As a relevant building, yes.

20 Q. Yes.

21 Now, if you go back, please, to the fee proposal, if

22 we can just do that, which you will find at

23 {TMO10037721/2}, we can see immediately below the

24 opening part of the fee proposal that it says, "The

25 scope of work for the project would therefore

1 include" -- and we looked at this a moment ago -- site
 2 visit and the compilation of the report. We will come
 3 back to the site visit question in a moment, but can we
 4 agree, at least by reference to this document,
 5 Ms Cooney, that a site visit of up to half a day was
 6 envisaged and included as part of the fee proposal?
 7 A. Yes.
 8 Q. We can then see some caveats, I think, underneath that.
 9 Do you see what it says? It says:
 10 "It is assumed that a suitable and sufficient fire
 11 risk assessment exists for the buildings in their
 12 current condition, and that any relevant findings of
 13 that risk assessment will be made available to Exova
 14 Warringtonfire."
 15 Do you see that?
 16 A. Yes.
 17 Q. The fee proposal then goes on to say below that that the
 18 scope of works is based on:
 19 "... the assumption that a detailed appraisal is not
 20 required of the structural fire protection to the
 21 loadbearing elements of structure or of the fire
 22 compartmentation within the building. However, if it
 23 should transpire during the site survey that such an
 24 appraisal is necessary, then the scope of works can be
 25 extended to cover this, subject to a separate fee

1 agreement."
 2 So you saw that.
 3 So, first of all, was it your understanding, when
 4 you did your report, that a detailed appraisal wasn't
 5 required of the structural fire protection to the
 6 load-bearing elements of the structure or the fire
 7 compartmentation within the building?
 8 A. That's right, not for this particular piece of work.
 9 Q. Right.
 10 I know you can't recall seeing this fee proposal at
 11 the time, but if you didn't, where did that
 12 understanding come from, or is that a standard basic
 13 element that you would essentially exclude a detailed
 14 appraisal of those matters?
 15 A. It would be something which would be written in rather
 16 than written out. So the piece of work that I was given
 17 was essentially a desktop appraisal, a desktop study, on
 18 the information that was given to us. So the paragraph
 19 you're referring to there would relate to a much more
 20 detailed and maybe invasive kind of survey of the
 21 building.
 22 Q. Yes. It goes on indeed to say:
 23 "... if it should transpire during the site survey
 24 that such an appraisal is necessary, then the scope of
 25 works can be extended ..."

1 Can we take it that during the site survey
 2 an appraisal did not present itself as necessary?
 3 A. So James liaised with -- I remember James liaising with
 4 me from site where he outlined various items within the
 5 building, so --
 6 Q. Right. We will come back to that shortly.
 7 Before I move down, can I just ask you to look
 8 within the same part of the proposal, where it says,
 9 just above the four bullet points:
 10 "In developing the report, we would use our expert
 11 knowledge of fire safety design codes."
 12 Which fire safety design codes would that have been
 13 referring to, do you know?
 14 A. So as a benchmark it would have been Approved
 15 Document B.
 16 Q. Approved Document B. Anything else?
 17 A. Also ... section 20 would come into it as a relevant
 18 building.
 19 Q. Yes.
 20 A. Maybe the fire risk assessment guide for ... for
 21 residential buildings as well. But as kind of the
 22 keystone it would be Approved Document B.
 23 Q. Now, if you go down the page, you will see a heading
 24 "Fire Engineering Team". Do you see that? In the
 25 second paragraph it says:

1 "The fire safety team would be based in our London
 2 office. James Lee (Consultant) [and there is an email
 3 address and telephone number for him] would lead the
 4 project with assistance from others within the company
 5 as necessary. CVs of the fire safety team can be
 6 provided upon request."
 7 So was it originally envisaged that staff in Exova's
 8 London office would do the work on this fire safety
 9 strategy?
 10 A. That was my understanding, yes.
 11 Q. Right.
 12 Did it surprise you that you were being given the
 13 job of writing this report for a London building, given
 14 that you were based in Warrington at the time and not
 15 London?
 16 A. No. No, it didn't surprise me.
 17 Q. Did it surprise you that you would be writing it but
 18 James Lee would be leading the project from London?
 19 A. No.
 20 Q. Right.
 21 A. No.
 22 Q. Now, he was a consultant at the time; I take it that
 23 that was a more senior position to the one that you
 24 occupied at the time?
 25 A. No, the consultant is a grade below.

1 Q. Oh, I see. You did say earlier. So he was junior to
 2 you, was he?
 3 A. Yes, at the time.
 4 Q. I see, he was junior to you. Was Terry Ashton senior or
 5 junior to him, do you remember? He was an associate.
 6 A. Very much senior.
 7 Q. Very much senior, okay.
 8 SIR MARTIN MOORE-BICK: Mr Millett, I'm wondering if we're
 9 getting to a convenient point.
 10 MR MILLETT: We are approaching a convenient point and I was
 11 hoping to get to that point at 11.45.
 12 SIR MARTIN MOORE-BICK: All right.
 13 MR MILLETT: If I haven't, then I haven't, but let me --
 14 I think I can, if that's convenient to you, Mr Chairman,
 15 and to the witness.
 16 SIR MARTIN MOORE-BICK: Yes, carry on.
 17 MR MILLETT: Right.
 18 Let's look at the bottom of page 2, "Fee Proposal":
 19 "The fixed lump sum fee, exclusive of VAT but
 20 inclusive of expenses for each stage of the fire safety
 21 work is £2,865."
 22 Do you see that?
 23 A. Yes.
 24 Q. That's subject to the detailed standard terms and
 25 conditions in appendix A. You can see that there.

1 At paragraph 3.5 of your statement {EXO00001590/2},
 2 if we can please go back to it, you can see that you
 3 say:
 4 "I understood that it was proposed that Grenfell
 5 Tower would be altered and refurbished, and that the
 6 purpose of the Existing FSR was to review the existing
 7 design and provide a baseline as to the compliance of
 8 the fire provisions with the current Building
 9 Regulations and guidance."
 10 When you say "provide a baseline", what do you mean
 11 by a baseline? A baseline for what?
 12 A. For the fire safety requirements. So to ensure that
 13 what was actually there in the building at the time was
 14 within the realms of what is acceptable for fire safety,
 15 as an informative piece of work, really.
 16 Q. Right.
 17 You say, "I understood that it was proposed that
 18 Grenfell Tower would be altered and refurbished", and
 19 then the purpose was this baseline; who told you that?
 20 A. I remember being aware that the building was to be
 21 refurbished, however they wanted an existing
 22 fire strategy for the design of the building as it
 23 stood.
 24 Q. I see.
 25 A. So not taking into account any of the proposed works.

1 Q. Right.
 2 You see, one takes away from that paragraph the
 3 suggestion that there was going to be an alteration and
 4 a refurbishment to the tower for which the existing FSR
 5 was to be a baseline.
 6 Let me try the question in a different way: what was
 7 the intended relationship, as you saw it, between the
 8 fire strategy report that you were going to do and the
 9 proposed refurbishment works?
 10 A. As I've said, as an informative piece of work that shows
 11 that if, you know ... that the design of the building at
 12 that time would meet with the requirements of the
 13 Building Regulations going forward. So, for example, if
 14 it didn't have any smoke shaft at all, that would be,
 15 you know, something of a showstopper, it would be
 16 a major re-design, et cetera. So it was looking at what
 17 was actually -- actually there and whether that was
 18 feasible for the refurbishment without actually going
 19 into -- into what those elements were going to be.
 20 Q. Yes.
 21 A. What they were at the time.
 22 MR MILLETT: I see, thank you very much.
 23 Mr Chairman, that is a convenient moment for you,
 24 and it's convenient all round.
 25 SIR MARTIN MOORE-BICK: Well, Ms Cooney, you might like to

1 have a break.
 2 THE WITNESS: Thank you.
 3 SIR MARTIN MOORE-BICK: We will stop now and come back at
 4 12 o'clock.
 5 THE WITNESS: Thank you very much.
 6 SIR MARTIN MOORE-BICK: While you're out of the room, please
 7 don't talk to anyone about your evidence or anything to
 8 do with it. All right?
 9 Go with the usher, please.
 10 12 o'clock, please. Thank you.
 11 (11.48 am)
 12 (A short break)
 13 (12.02 pm)
 14 SIR MARTIN MOORE-BICK: All right?
 15 THE WITNESS: Yes.
 16 SIR MARTIN MOORE-BICK: Ready to carry on?
 17 THE WITNESS: I am, yes, thank you.
 18 SIR MARTIN MOORE-BICK: Mr Millett.
 19 MR MILLETT: Thank you, Mr Chairman.
 20 Ms Cooney, before looking at the draft fire safety
 21 strategy that you produced, I want to ask you some
 22 questions, if I may, please, about what information you
 23 had available to you when you were drafting it.
 24 First of all, site visit. Did you ever visit the
 25 site yourself?

1 A. I didn't, no.
 2 Q. Why is that?
 3 A. It was my understanding that my colleague would be doing
 4 the site survey, and relay information back in that
 5 manner.
 6 Q. You say it was your understanding that your colleague
 7 would be doing the site survey. Do we take it from that
 8 that you learnt that he was going to do it or she was
 9 going to do it before they went?
 10 A. I would presume so, yes. I can't recall exactly what
 11 the timeline was, but yes.
 12 Q. Who did the site survey?
 13 A. James Lee.
 14 Q. So did you have a discussion with him about your
 15 proposed work before he did the site survey?
 16 A. I do recall speaking with James about checking the
 17 ventilation, so from that I would assume that it was
 18 prior to him going.
 19 Q. Right, okay. We will come to that in just a moment.
 20 Is the reason why he did the site survey and you
 21 didn't because you were based in the Warrington office
 22 and he was based in the London office?
 23 A. Yes.
 24 Q. Right.
 25 Was it usual for you, at the time, do you remember,

1 to prepare a draft fire safety strategy for a building
 2 without having visited it?
 3 A. Erm ... both, yes and no. It depended on the building.
 4 So if it was a particular thing we had to see, then we
 5 would go to site. But many fire safety strategies are
 6 prepared from drawings.
 7 Q. Right.
 8 A. So ...
 9 Q. Would it in this case have been useful, do you think, to
 10 have attended the site yourself?
 11 A. It would have been, yes.
 12 Q. Let's just have a look back at the fee proposal, please,
 13 {TMO10037721/2}. We looked at this earlier under the
 14 first bullet point on page 2, under "Proposed Scope of
 15 Work", site visit, and it says:
 16 "a site visit (expected to take no longer than
 17 half a day) to survey the building's architecture and
 18 fire safety systems."
 19 Do you see that?
 20 A. Yes.
 21 Q. Now, from what we have seen, Mr Lee undertook a site
 22 visit on 29 May 2012. Do you recall that?
 23 A. I don't, no.
 24 Q. He says it in his statement, and I don't think we need
 25 to call that up, but just for the transcript it's

1 {EX000001740/3} at paragraph 3.6.
 2 Now, do you know whether he ever took any other site
 3 visits other than the one he did on 29 May 2012?
 4 A. I think I recall that he did, yes.
 5 Q. Right.
 6 A. Because I remember speaking to him about it, so --
 7 Q. Right.
 8 A. Specifically in relation to the shaft dimensions.
 9 Q. Okay.
 10 Now, just to get the dates right, he says he did his
 11 site visit on 29 May. The site visit took place -- that
 12 site visit, at least -- before the fee proposal dated
 13 11 June. But you're saying you think he did another
 14 one, a later one, after 11 June?
 15 A. I think so. I can't absolutely guarantee it, because
 16 it's so long ago, I don't remember the timeline, but
 17 I was under the impression that he had, yes.
 18 Q. The site visit specified in the proposal is only for
 19 one, "a site visit (expected to take no longer than half
 20 a day)". Are you saying that there was another site
 21 visit, even though the fee proposal specified a single
 22 visit?
 23 A. There may well have been. That's not terribly unusual.
 24 Q. Right.
 25 Do you know why the quotation only quoted for one

1 site visit if one had already been done?
 2 A. I don't. I don't know.
 3 Q. Right.
 4 Now, you say you spoke to him. When you spoke to
 5 him, roughly when was that?
 6 A. Well, it will have been after I was asked to take the
 7 piece of work on, so I would assume it was between
 8 Dr Barker giving me the piece of work and producing the
 9 draft document. So within that two or three weeks.
 10 Q. You see, we have been told that Mr Lee, James Lee, left
 11 Exova on 30 July 2012.
 12 A. Okay.
 13 Q. So if he left Exova on 30 July 2012, do you know why he
 14 was speaking to you from site, as you say, about this
 15 work after you were tasked with the preparation of the
 16 report?
 17 A. That's how my memory remembers it. Like I say, the
 18 actual timeline I don't recall precisely. It's in and
 19 around that time. So I suppose that's a question for
 20 Mr Lee. But I do recall speaking to him.
 21 Q. Now, you say in paragraph 3.7 of your statement, if you
 22 can go back to that, {EX000001590/3}, at paragraph 3.7
 23 in the last sentence there:
 24 "I also discussed the layout with Mr Lee, who had
 25 been on site, in order to understand the layout."

1 Earlier this morning you said -- this is
 2 {Day14/67:6}, you don't need to go back to it -- that he
 3 liaised with you from site. Do you remember whether he
 4 liaised with you from site or after he had been to site?
 5 A. I don't know whether he was actually in the building at
 6 the time or whether he was in the vicinity or in the
 7 office, I suppose. It was on the phone, so I couldn't
 8 accurately say where he was. But I do -- what I recall
 9 is the conversation about the building and specifically
 10 the ventilation.
 11 Q. Do you recall even roughly how soon after you were asked
 12 by Ms Barker to do this report you had the conversation
 13 with Mr Lee?
 14 A. I don't recall it to that kind of level. Possibly in
 15 the first week afterwards.
 16 Q. Right.
 17 Just sticking with paragraph 3.7 you say you
 18 discussed the layout with Mr Lee, who had been on site,
 19 in order to understand the layout.
 20 A. Yes.
 21 Q. It's logical, isn't it, that that must have been before
 22 he left Exova?
 23 A. Absolutely, yes.
 24 Q. Right.
 25 A. Yes.

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1 Q. If that's right, then your recollection about when you
 2 were first asked to prepare this report must be wrong,
 3 because he left in July.
 4 A. Erm --
 5 Q. At the end of July.
 6 A. I would have to check the dates when he left, and the
 7 dates -- if there's any other correspondence which
 8 pre-dates what I've seen. That is my understanding of
 9 the timeline, but it is some time ago, so memory can
 10 jump around a little bit.
 11 Q. All right.
 12 Your recollection in your statement at paragraph 3.7
 13 is that you discussed the layout with Mr Lee in order to
 14 understand the layout. Was your discussion with Mr Lee
 15 limited to the layout?
 16 A. No.
 17 Q. What else did you discuss?
 18 A. I do recall speaking to him about the ventilation, as
 19 I've said, and just the general elements of the
 20 building. So I think we spoke about how the stair
 21 enclosure kind of came through the building and down the
 22 building to the final exit door, the last door out the
 23 building. I don't remember specifics other than those
 24 kind of things.
 25 Q. Right.

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1 When you had the conversation with Mr Lee about the
 2 enclosures and the final exit door, the matters you've
 3 just referred to, was he reporting to you about what he
 4 had found on site or were you asking him questions
 5 arising out of concerns you had had from looking at the
 6 documents with which you had been provided?
 7 A. I remember being quite perplexed by the layout of the
 8 lower floors, because it didn't seem to flow on the
 9 drawings that I had received, which were quite grainy.
 10 So I think I asked him if he would look at certain
 11 elements for me and report anything back --
 12 Q. Right, okay.
 13 A. -- on those.
 14 Q. We will come back to Mr Lee in a moment. Can I ask you
 15 to go back, please, to paragraph 3.6, because I think
 16 I would like to take Mr Lee in a slightly more ordered
 17 way. 3.6 in your statement, page 3, you say:
 18 "In producing the Existing FSR, I was initially
 19 provided with a limited amount of information. I recall
 20 looking at the original plans for Grenfell Tower on
 21 microfiche."
 22 Then you say you assume they would have come from
 23 the architect:
 24 "This is typical of the amount of information I
 25 would have expected to receive to carry out a fire

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1 strategy report on an existing building."
 2 Just to be clear, was the information that you were
 3 provided with just the microfiches of the original plans
 4 for Grenfell Tower?
 5 A. Originally, yes. Yes.
 6 Q. How did you get those, do you remember?
 7 A. I requested them from Studio E.
 8 Q. Okay. Because you say, "I assume", but you can't
 9 remember, that they would have come from -- is that
 10 because you asked for them specifically?
 11 A. I did ask.
 12 Q. You did.
 13 A. We had no working drawings of the existing tower to
 14 actually consider, and they were obviously the bench --
 15 the basics of what you would expect. So I requested
 16 them, yes.
 17 Q. Did you ask for anything else from Studio E?
 18 A. Erm --
 19 Q. Other than the microfiches?
 20 A. I asked for the -- I asked several questions, as I now
 21 remember from looking at documents, and the fire risk
 22 assessment for the building.
 23 Q. Right.
 24 You say that you were initially provided with
 25 a limited amount of information, and I'm stressing those

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1 words. Can you explain why you say the initial
 2 information provided to you was limited to that
 3 material?
 4 A. Yes, the drawings which we received, which had been
 5 taken from microfiche archives of the tower when it was
 6 first designed, came through on A4 layout, and the
 7 actual building lines were quite fuzzy, for want of
 8 a better term, they were quite blurred over time, and
 9 obviously the process of getting them onto a paper
 10 format rather than on a microfiche, that's what I recall
 11 looking at initially .
 12 Q. Right.
 13 You say the information was limited, and all you got
 14 was the microfiche, and you added to that just now. Why
 15 was the information that you got limited as opposed to
 16 all of the information that you would ask for and expect
 17 to get in order to be able to produce a report like
 18 this?
 19 A. Just the quality of the drawings was very poor, so
 20 actually trying to determine the lines that surrounded
 21 the lobby, the firefighting stairs, the flats' layouts,
 22 et cetera, were quite difficult to determine, and
 23 I remember taking quite some time to assess the layout
 24 from the drawings themselves.
 25 Q. Right.

1 So if the quality of the drawings on the microfiche
 2 were so poor, as you say they were, why not get on the
 3 train and go down to Grenfell and look at it for
 4 yourself?
 5 A. Erm ... it's a -- I could have done that, I suppose.
 6 I think having sat and studied and looked at them, the
 7 tower was -- you know, each floor was a replica of the
 8 one below it, so as long as I was pedantic about looking
 9 at those lines, I could see that that was the structure
 10 of the building at the time.
 11 Q. You have answered my questions on paragraph 3.6 by
 12 referring to the quality of the outline of the drawings
 13 on the microfiche, which I understand, but the
 14 impression one gets from 3.6 is that you were initially
 15 provided with a limited amount of information, but that
 16 that amount of information would be typical that you
 17 would expect to receive to carry out a fire strategy
 18 report on an existing building.
 19 Just so I understand your evidence, are you saying
 20 that the information about Grenfell Tower comprised in
 21 the plans on microfiche is all you would ordinarily get,
 22 or expect to get, in order to be able to carry out
 23 a fire strategy report such as this?
 24 A. We would typically expect to see drawings for
 25 a building, it just was that the quality of these

1 drawings weren't the best. So typically for an existing
 2 building we would ask the responsible people, the people
 3 from the health and safety file, et cetera, for
 4 drawings, layouts of the drawing. Hopefully if they
 5 have a fire strategy drawing, we would ask for one of
 6 those, which would indicate various fire safety related
 7 matters. They really varied, depending on the age of
 8 the building and how it's been recorded over time. But
 9 to have archived documents isn't unusual.
 10 I think the limited amount of information was due to
 11 the fact that they were quite -- it's quite small
 12 replicas of what was on the microfiche. So whilst you
 13 could kind of look at them and interpret them, it
 14 wasn't ... it wasn't without having to go through
 15 a process to be able to understand the layout, if that
 16 makes sense.
 17 Q. Leaving aside the question of the quality of the
 18 drawings on the microfiche, would you normally carry out
 19 a fire safety strategy report on an existing building on
 20 such limited information as you have described here?
 21 A. That's where we would start off, I think, yes. Yes.
 22 Q. Right. Because you say in the last sentence:
 23 "This is typical of the amount of information
 24 I would have expected to receive to carry out
 25 a fire strategy report."

1 It rather suggests that that is all you would need
 2 in order to carry out a fire strategy report; is that
 3 right?
 4 A. I think it could be read that way. I don't think that's
 5 the intent of it. I think it's ... it's certainly part
 6 of the basic information that you would expect to
 7 receive.
 8 Q. What else would you expect to receive?
 9 A. We would ask for as much information as we possibly
 10 could get.
 11 Q. Right.
 12 A. But certainly the fire risk assessment and any other
 13 pertinent information that was in the files that they
 14 had, we would go through.
 15 Q. Going back to your discussion with Mr Lee that you
 16 recall, did Mr Lee give you any information relating to
 17 the fire safety systems present in the building?
 18 A. Beyond the ventilation, I can't recall specifics on
 19 the ... I think there was some information about some
 20 detection.
 21 Q. I see.
 22 Would you normally ask your client or your
 23 instructing person to provide you with up-to-date
 24 drawings of all active and passive fire safety systems
 25 within the building?

1 A. Not necessarily. If the basic infrastructure is there,
 2 and the ongoing use of the building has maintained
 3 those, then we wouldn't necessarily -- we wouldn't
 4 interrogate that to the same level as a fire risk
 5 assessment would, with it being just a -- it would be
 6 focused on the design criteria .
 7 Q. I'm not sure I understand why that is so. Surely you
 8 would want to see all accurate detailed drawings which
 9 demonstrated the up-to-date position of all active and
 10 passive fire prevention systems or mitigation measures
 11 in the building in order to do your report; no?
 12 A. You would, if they were available, yes, but at the time
 13 we were asked to carry out the work, that package of
 14 information was all we received, all we had, and we
 15 did -- I do recall asking for information from Studio E,
 16 and that's where the fire risk assessment came from.
 17 But that's ... we could only work with the information
 18 that we had at that time, otherwise it would have ... it
 19 would have, I suppose, pushed a deadline further back,
 20 and as it was a draft report anyway, it was a first kind
 21 of pulling together of all the relevant information we
 22 had at that moment.
 23 Q. Right.
 24 You say in that last answer, which I think I need to
 25 just follow up on, "I do recall asking for information

1 from Studio E, and that's where the fire risk assessment
 2 came from". We will come to the fire risk assessment
 3 later. I want to get clear: when did you ask for
 4 information from Studio E, over and above the request
 5 for the drawings, the microfiche?
 6 A. I think I asked for it on an email. I think there's
 7 an email somewhere where I've asked --
 8 Q. Did you actually specifically ask Studio E for the
 9 up-to-date drawings of all active and passive fire
 10 prevention or mitigation systems in the building?
 11 A. Not in those words. But, yes, we asked for all the
 12 information that they had or could get on the existing
 13 building.
 14 Q. Right.
 15 You say at paragraph 3.7 of your statement:
 16 "... I had difficulties trying to work out the
 17 layout of the lower floors from the information I had,
 18 so I requested drawings and photographs of Grenfell
 19 Tower from Studio E to assist me in visualising the
 20 layout."
 21 Now, again, wouldn't it have been simpler to take
 22 yourself down to the site and look at it yourself and
 23 take your own measurements and photographs?
 24 A. It's certainly something I could have done, yes.
 25 Q. My question really is: why didn't you?

1 A. Because I was liaising with other members of staff who
 2 were more local than I was. I was asked to undertake
 3 a desktop-based study, so ... yes, I could have gone
 4 if ... if I felt like the information I was getting
 5 wasn't answering questions.
 6 Q. Right.
 7 A. Yes.
 8 Q. I see.
 9 Did you feel in any way that you were constrained by
 10 the budget of just under £3,000?
 11 A. Not particularly, no.
 12 Q. Right.
 13 A. No.
 14 Q. Did Mr Lee give you any notes that he had made about his
 15 site visit?
 16 A. I don't recall receiving anything written.
 17 Q. Did you ask him for any?
 18 A. I don't recall that I did, no.
 19 Q. Why is that?
 20 A. I do recall discussing with him on the telephone the
 21 various things, so I will have made my own notes from
 22 that up in Warrington to incorporate into the report.
 23 Q. Right. Are you saying that you made a note of your
 24 telephone discussion with Mr Lee?
 25 A. I would have done, probably, as is my general -- when

1 I'm trying to gather information, it would have been on
 2 the back of a drawing or something like that.
 3 Q. Right. Do you keep a notebook for each project --
 4 A. I don't. I do now, but at the time, I didn't, no.
 5 Q. Was that general practice within Exova, for people in
 6 your position, when instructed to do a report, not to
 7 make notes of important matters?
 8 A. No, it was ... it was various. So I know that Dr Barker
 9 was quite fastidious about notebooks, but other members
 10 of staff would be more reliant on their emails or
 11 other -- memories, et cetera, rather than documenting
 12 every single matter. Yeah.
 13 Q. Just to be clear, you're saying to us, are you, that you
 14 took a note of what Mr Lee said on the call and you
 15 wrote that down on the plans or on the back of the
 16 plans?
 17 A. It will have been -- that was my general -- where I kept
 18 all my information, and then obviously once that
 19 information has been kind of dealt with, the report has
 20 been prepared, then I would have put it in a pile with
 21 the other stuff to be dealt with, kind of as a filing
 22 system, if you will.
 23 Q. You say "as a filing system, if you will". Do you know
 24 where those plans or those notes went?
 25 A. I genuinely do not know what happened post carrying out

1 the report, where -- they would have been probably with
 2 a stack of completed paperwork which -- I don't know
 3 what I will have done with those. If I'm perfectly
 4 honest, they probably would have been disposed of at
 5 some point.
 6 Q. Would it be normal at Exova to maintain a project file
 7 for a project such as this?
 8 A. It's normal to have a digital file, so --
 9 Q. Right.
 10 A. We didn't keep -- well, I didn't. As I say, other
 11 members of staff work in different ways, as everybody
 12 does, but I didn't keep a paper project file.
 13 Q. Was there a document management system or a quality
 14 control system which actually made the system uniform
 15 across the organisation --
 16 A. Yes.
 17 Q. -- for maintaining documents?
 18 A. Yes, there's a digital based filing system, if you will.
 19 But the notes that I will have incorporated within the
 20 strategy are then in the strategy, so I wouldn't have
 21 kept the original handwritten notes from the telephone
 22 conversations.
 23 Q. Have you been asked to provide those notes or identify
 24 or assist in identifying those notes from the project
 25 file or digital system, as you call it, in order to be

1 able to assist the Inquiry?
 2 A. Yes, every last piece of information in the office and
 3 on the computer systems was trawled through, so --
 4 Q. Okay.
 5 Now, do you remember, casting your mind back to the
 6 conversation, whether Mr Lee made any comment on
 7 whether, during his survey, or surveys, as it now turns
 8 out, an appraisal of the structural fire protection to
 9 the load-bearing elements of the building or fire
 10 compartmentation within it was required?
 11 A. Sorry, could you rephrase that?
 12 Q. Yes.
 13 Did Mr Lee make any comment to you about whether,
 14 during his site survey, he thought that an appraisal of
 15 the structure was required, either in relation to the
 16 load-bearing elements or in relation to the
 17 compartmentation?
 18 A. I don't recall whether he did. I do know that we put
 19 that into the report for it to be checked.
 20 Q. Right. Did you see the photographs that he took?
 21 A. I do recall some photographs, yes.
 22 Q. Right. Let's just have a look at one or two, if we can.
 23 {EX000001749}, please. These are some photographs.
 24 There are 24 of them, I think. If you could just be
 25 shown those with a quick scan through some of them at

1 the beginning.
 2 Are those photographs that are familiar to you, do
 3 you think?
 4 A. Yes.
 5 Q. You think those are the photographs?
 6 What use would those photographs have been to you --
 7 and some of them may be more useful than others -- when
 8 you received them?
 9 A. So that I could get a physical look at the materials of
 10 the building and its general scale and layout.
 11 Q. Right.
 12 A. Some are, like you say, more useful than others, but ...
 13 Q. Now, did you have any discussion with Mr Lee about
 14 whether he had been told about the TMO's intended budget
 15 for Exova's work on Grenfell Tower?
 16 A. Not that I -- no.
 17 Q. No?
 18 A. No.
 19 Q. Did Mr Lee or anybody else give you a reason to think
 20 that the job was being done on an extremely tight
 21 budget?
 22 A. No.
 23 Q. Going back to this question of the baseline for
 24 compliance that we looked at earlier -- you remember,
 25 where you said in your report that the fire safety

1 strategy was to be a baseline -- did you think at the
 2 time that it was essential that your report should be
 3 entirely accurate because, if it wasn't entirely
 4 accurate, then that might have a knock-on effect on the
 5 fire strategy that was to be done for the refurbishment?
 6 A. I don't think I ever looked at it from those -- that
 7 point of view. It would be as accurate as I was able to
 8 make it, with the information we had at that time, and
 9 as a report on which other matters may well refer back
 10 to, to see what the existing condition was.
 11 Q. Now, is it right that you carried out substantially all
 12 the work on the existing fire safety strategy for the
 13 tower except the site visit?
 14 A. Yes.
 15 Q. So nobody else helped you with it?
 16 A. Not that I recall, really, no.
 17 Q. Now, can I ask you to look at an email, please,
 18 {EX000001279}. This is your email to Andrew Martyn on
 19 17 August 2012 at 12.09. The time may become important
 20 later in your evidence. We will come back to that this
 21 afternoon.
 22 Just to orientate you in your recollection in terms
 23 of the chronology, this was 17 August, so the day after
 24 your existing fire safety strategy report was signed off
 25 by Clare Barker.

1 A. Okay.
 2 Q. Yes?
 3 A. Okay, yes.
 4 Q. Right.
 5 Take a chance to look at it. It's an email that you
 6 are probably familiar with --
 7 A. Yes.
 8 Q. -- by now, because it was referred to by various people
 9 during the opening, and it has some fairly colourful
 10 language in it, so it might trigger a recollection.
 11 A. It does, yes.
 12 Q. We will come back to that part of it later, but was this
 13 at a time when you were about to go on holiday?
 14 A. It is, yes.
 15 Q. Was this basically a handover email to Andrew Martyn?
 16 A. I wouldn't be as complete as saying it was a handover.
 17 I was expecting Bruce to get back to me --
 18 Q. Right.
 19 A. -- having issued the strategy, and it was really for him
 20 just to field any calls that may come in whilst both
 21 myself and Dr Barker were on leave.
 22 Q. Okay.
 23 A. And -- yeah, it's ...
 24 Q. Okay. Can I just focus with you, then, on the sentence
 25 just below the middle of the paragraph, which says:

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1 "James has been to site ..."
 2 Do you see?
 3 A. Yes.
 4 Q. "James has been to site and given some advice, but
 5 I don't know what he's said, but it would appear not
 6 much."
 7 A. Mm-hm.
 8 Q. Just focusing on that, can you just explain why you're
 9 writing that, if you have had a conversation with Mr Lee
 10 that you now recall about the detail of what's in the
 11 building, including the state of the exits, et cetera?
 12 A. As far as I'm -- you know, I don't know what -- so this
 13 email, to put into context, is in relation to an email
 14 I had been sent by Terry, I think it was, who was asking
 15 my opinion on a proposal from the architects on one of
 16 the options for the layouts of the lower floors in the
 17 refurbishment package. So it's not -- it's not related
 18 to the existing strategy at all. So they were looking
 19 at the layout of those new floors containing some
 20 residential accommodation.
 21 So I know that James had been to site, he had spoken
 22 to the client, but I don't -- he didn't -- maybe because
 23 he had left or was imminently leaving, but I don't know
 24 actually what he had actually said to the architects or,
 25 indeed, if he had any contact with the client.

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1 Q. I see.
 2 Do you know or did you discover what James Lee had
 3 actually said during the conversation you record him
 4 having had with somebody before you submitted the draft
 5 report to Dr Barker for her peer review the day before?
 6 A. I don't know what James had discussed on site with
 7 others, no.
 8 Q. Did you not think to ask him?
 9 A. In the context of what we were looking at here, I think
 10 there are some layout drawings somewhere that he was
 11 looking at some compartment lines and requirements for
 12 fire resistance, and I think that's where it's come
 13 from, because it didn't really detail much more than
 14 that to me.
 15 Q. Right.
 16 When you wrote this in your email, what were you
 17 going on when you said that he had given some advice,
 18 "I don't know what he has said, but it would appear not
 19 much"? Were you looking at an email or were you
 20 referring to something that somebody told you?
 21 A. I think it was to do with the email of the proposed
 22 layout of the residential proposals at the lower floors.
 23 Q. But you say he has "given some advice, but I don't know
 24 what he's said". Who told you that he'd given some
 25 advice?

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1 A. I don't remember the context of formulating that
 2 particular sentence.
 3 Q. You go on to say, "it would appear not much". What
 4 would that appear to you from, do you remember?
 5 A. Again, just not having the information in front of me to
 6 see what's happened on site.
 7 Q. Who are you in contact with at all about Grenfell Tower,
 8 other than a conversation with James Lee about or from
 9 site and Dr Barker?
 10 A. The only contact I recall having with -- outside of
 11 Exova was with Bruce at Studio E.
 12 Q. Right. I see.
 13 A. I know there were some emails from KCTMO with the fire
 14 risk assessment, but I didn't actually speak to -- it
 15 was just a received email.
 16 Q. Right.
 17 Did you know at this point that James Lee's visit
 18 had only lasted two hours?
 19 A. No, I didn't know.
 20 Q. Would you agree that two hours would be insufficient in
 21 order to make a meaningful appraisal of the building for
 22 the purposes of preparing a fire strategy for
 23 an existing building such as Grenfell Tower, which is
 24 a pretty substantial tower block?
 25 A. I think if you have assessed the layout of the building

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1 in terms of fire safety design of that type of
 2 a building, it is a short amount of time, but it's not
 3 an unmeaningful amount of time, where you can determine
 4 the various components of the building fairly quickly.
 5 Q. Now, according to the evidence that Mr Lee has given, he
 6 left Exova, as I said before, on 20 July 2012, which is
 7 more than two weeks before you started work on the
 8 existing building fire safety strategy. Indeed, he had
 9 left almost a month before you sent the email to
 10 Andrew Martyn that we have up here on the screen.
 11 What steps did you take to ensure that you had
 12 obtained all the relevant information from James Lee
 13 regarding his site visit before he left?
 14 A. Just from the conversation that we had, really. There
 15 was no reason for James not to give me all the
 16 information. Did I -- I didn't specifically ask the
 17 question, "Is that all the information?" because it's
 18 not the kind of question you would necessarily ask. You
 19 would have that discussion and that would be, you know,
 20 the assumption that your colleague is giving you
 21 everything that you need to have.
 22 Q. Okay. We will come back to this email later on.
 23 Going back to your statement, if I can, please,
 24 page 8 {EXO00001590/8}, paragraph 6.4, you say halfway
 25 down the paragraph:

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1 "I had reviewed the existing Fire Risk Assessment
 2 provided prepared by CS Stokes Associates Limited, dated
 3 29 December 2010, which had been sent to me by Janice
 4 Wray of KCTMO ... and that had raised no concerns
 5 regarding compartmentation so would have informed my
 6 assumption."
 7 Just so you're clear about the context, you're
 8 talking about the level of compartmentation which you
 9 said you expected to be high.
 10 A. Mm-hm.
 11 Q. Can we assume together that the risk assessment that
 12 you're referring to is the fire risk assessment by
 13 Carl Stokes dated 29 December 2010?
 14 A. Yes.
 15 Q. Yes.
 16 A. It was.
 17 Q. Okay, we're going to come to that in just a moment.
 18 Can I show you one document before we get there.
 19 First of all, {TMO10037740}. This is an email, if we
 20 look at the top email, from Paul Dunkerton to you on
 21 13 August 2012, copied to Janice Wray. You can see just
 22 below it, the second email on the page, Janice Wray had
 23 sent to Paul Dunkerton something called "Attached". Do
 24 you see that?
 25 A. Yes.

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1 Q. We will come to the attached in a moment. Then
 2 Paul Dunkerton sends it on to you:
 3 "Cate,
 4 "Please find attached information requested."
 5 Do you see that?
 6 A. Yes.
 7 Q. That was in response to something the same day.
 8 Can I ask you to look at the attachment. This is
 9 {TMO10037743}. This is the fire risk assessment of
 10 29 December 2010 done by Carl Stokes for Grenfell Tower.
 11 So that was what was attached to the email.
 12 Do you remember seeing this attachment?
 13 A. I do, yes.
 14 Q. Yes.
 15 Did you take any steps to verify that the fire risk
 16 assessment was accurate? We can see that it's dated
 17 December 2010 and this is now almost two years later.
 18 So the question again: did you take any steps to
 19 verify that the FRA, the fire risk assessment, was
 20 accurate?
 21 A. No. As a professional document, I didn't feel the need
 22 to dissect it beyond what it is.
 23 Q. Okay.
 24 If you look at page 1, you can see that there are
 25 some areas not covered.

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1 A. Mm-hm.
 2 Q. Do you see that at the foot of the page?
 3 A. (Witness nods).
 4 Q. Yes?
 5 A. Yes, yes.
 6 Q. And it includes the boxing club, the nursery, access to
 7 the upper ground floor and upper ground floor level
 8 offices.
 9 What steps did you take, if any, to request the fire
 10 risk assessments for those non-residential areas which
 11 were excluded from Mr Stokes' report?
 12 A. I didn't request anything beyond this, and I think the
 13 principal reason for that is that those areas are --
 14 whilst relevant to the RRO, will have their own fire
 15 risk assessments individually, if they are tenanted out,
 16 for example. The layout of the building and the
 17 structure of the building didn't ... didn't bring any
 18 cause for concern, it's a very substantial in situ
 19 concrete reinforced frame, so I didn't ask for any
 20 further information on that.
 21 Q. Why is that?
 22 A. Probably at the time because I didn't think it was
 23 necessary for the draft that was going out.
 24 Q. Why wouldn't it be necessary for the draft?
 25 A. Principally because of the construction of the building.

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1 You know, looking at it in hindsight, yes, it would have
 2 been a good idea to ask for it. However, the
 3 information that would have come back from that, I can't
 4 see that it would have added a great deal extra
 5 information that I couldn't already have gathered from
 6 the layouts of the drawing -- layouts themselves.
 7 Q. But they would have told you that this was a building
 8 which had a single staircase but was shared by a wide
 9 range of different uses, so sports, leisure, childcare,
 10 and residential, and also the electrical substation. So
 11 it would have given you that information in detail,
 12 wouldn't it?
 13 A. They may well have given more detail, but I was already
 14 aware that it was a mixed use on the lower floors.
 15 Q. If you look at the very foot of the page, it says:
 16 "The significant findings and action plan of this
 17 Fire Risk Assessment are inserted next with this
 18 document continuing on page 2."
 19 Did you note that when you read this FRA after
 20 Mr Dunkerton had sent it to you?
 21 A. I did, yes.
 22 Q. Did you ask Mr Dunkerton for the significant findings
 23 and action plan referred to on page 1 there?
 24 A. I don't recall that I did, no.
 25 Q. Why is that?

1 A. Because the reason I was looking for the fire risk
 2 assessment wasn't necessarily to look at the specific
 3 discrete items. For example, many fire risk assessments
 4 might look at the -- more at the condition of things or
 5 the management of the building, combustibles in escape
 6 routes, et cetera, et cetera, whereas I was looking at
 7 the design of the building principally for the draft.
 8 Q. Were these significant findings and action plan not
 9 an important outcome or outcomes for you to see so that
 10 you could be sure about your baseline?
 11 A. Well, in any fire risk assessment, any suitable and
 12 sufficient one, any action plan, any findings on the
 13 action plan, should also be inherent in the report. So
 14 anything in the action plan should be drawn from the
 15 content of the report itself. It's a, I suppose,
 16 summary of findings, isn't it? So the information
 17 should already be in there in any event.
 18 So I suppose the answer to that is it should be in
 19 the report in any event, rather than as a separate --
 20 something new in the conclusion or the action plan.
 21 Q. So do I take from that answer that you were proceeding
 22 on the assumption that the report reflected all the
 23 significant findings and the action plan, such that you
 24 didn't trouble yourself to read it?
 25 A. I don't think it's a matter of I didn't trouble myself.

1 I think if the information had been there, of course
 2 I would have looked at it, but it should be in the body
 3 of the report in any event.
 4 Q. Right.
 5 Would you normally use or read a fire risk
 6 assessment that referred, well-signposted, to
 7 significant findings and an action plan, without
 8 actually reading the significant findings and action
 9 plan?
 10 A. It would have been -- it would have been informative to
 11 have them, absolutely, but based on the scope of the
 12 work that I was doing at the time, I must have felt that
 13 the report gave me sufficient information to be able to
 14 base the existing fire safety strategy on.
 15 With hindsight, yes, I probably would ask for it
 16 now. At the time, I must have been satisfied I had
 17 enough information to go on.
 18 Q. My question really is: how could you be satisfied that
 19 you had enough information to go on without double
 20 checking the information you did have in the report
 21 against the significant findings and action plan which
 22 formed an integral part of that report?
 23 A. Again, I would say that the information should be in the
 24 report, so just to look at the summary at the end
 25 isn't ... isn't where my focus would have been on. It

1 would have been on the actual ... on the content of the
 2 descriptions and the detail which the risk assessor had
 3 put in the report itself.
 4 Q. Going back to the question I asked a minute ago, because
 5 I'm not quite sure I got an answer, Ms Cooney, would it
 6 be normal for you to use or read a fire risk assessment
 7 that signposted significant findings and an action plan
 8 without reading them?
 9 A. Like I've said, in hindsight, yes, I would ask for it.
 10 But ... I suppose that's your answer, isn't it? I would
 11 ask for it now. At the time, I obviously didn't have
 12 it. Whether I did or didn't ask specifically for it,
 13 I honestly can't recall.
 14 Q. No.
 15 A. But I would assume that I didn't.
 16 Q. No. My question is: would it have been normal at the
 17 time not to have read the significant findings and
 18 action plan?
 19 A. No, I don't suppose it would have been normal, but
 20 that's the information we had.
 21 Q. Now, you sent an email to Bruce Soules on 9 August 2012
 22 asking him for further information, and we can see that
 23 at {EX000001592}, please.
 24 We can see that at the top of page 1 is an email
 25 from you to Bruce Soules on 10 August, where you thank

1 him for the information.
 2 I would like you just to go to page 3
 3 {EX000001592/3}, bottom of the chain on page 3. You
 4 start the chain on 9 August; do you see? You say to
 5 him, "Hello Bruce", and then you ask him some questions.
 6 You say:
 7 "Is the single stair serving the residential levels
 8 pressurized or is it only the lobbies to the flats which
 9 have ventilation provision?
 10 "Is there a dry riser?
 11 "Is there a fire fighting lift?
 12 "Do you know the construction of the riser doors ie
 13 whether they provide 2 hours fire resistance?
 14 "With an existing building I appreciate some
 15 information does vapourise over time. Any information
 16 you can provide would be useful."
 17 First of all, can I just ask you: what is a riser
 18 door? Is that the door to the dry riser or wet riser?
 19 A. Yes, it's a riser door, service risers, any doors that
 20 give access into the protective shafts.
 21 Q. I see.
 22 If you had done a half-day site visit, would you
 23 ordinarily have been able to establish the answers to
 24 those questions?
 25 A. Nominally, yes. Yes.

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1 Q. You say nominally?
 2 A. Nominally. So with a 40-year-old door or a 30-year-old
 3 door, we would be looking at it for its general
 4 construction and to see whether it looks and feels like
 5 a fire door, essentially. There's no -- if you don't
 6 have a certification for it, we couldn't pinpoint
 7 exactly what door it was. But, yes, we would look at
 8 the doors as part of that walk around site.
 9 Q. Right.
 10 Why hadn't you gleaned this information from
 11 James Lee when you spoke to him?
 12 A. I don't recall whether we discussed the doors. I do
 13 know that we did put a requirement in the strategy to
 14 check the fire resistance of the cores and doors, the
 15 fire resistance of the building generally.
 16 Q. If you knew that in an existing building some
 17 information would vaporise, as you put it, over time,
 18 wasn't it all the more important for you to go down to
 19 site, look at the condition of the building and assess
 20 the active and passive fire safety measures in the
 21 building?
 22 A. With James going to site, James is an experienced fire
 23 engineer, I don't think it makes it more important that
 24 I would go down. I would expect that information to
 25 come -- you know, for him to make those kind of

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1 assessments when he's walking around the building to see
 2 that they are fire doors and the fit, et cetera.
 3 Q. But he clearly hadn't, had he, otherwise you wouldn't be
 4 asking these questions?
 5 A. We wouldn't know necessarily the fire resistance of
 6 a fire door. We can go off the width, you can go off
 7 the strips and seals of a door to kind of guide you
 8 towards what the door might be, but without any markings
 9 on the doors, you're not necessarily going to find out
 10 whether it's a one-hour or 90-minute door or whatever it
 11 needed to be.
 12 Q. Can we take it that, at this time, you had to ask
 13 Bruce Sounes these questions because Mr Lee had not been
 14 able to give you the answers, or had not given you the
 15 answers?
 16 A. Possibly, yes, I would --
 17 Q. Do you remember what --
 18 A. That would be an assumption, yes.
 19 Q. Do you remember what prompted you to ask these questions
 20 of Mr Sounes?
 21 A. I think I was looking for the component parts to see
 22 whether they had any information on them, so ...
 23 Q. I see.
 24 If we look, please, at the response that comes from
 25 Mr Sounes on 10 August, it's at the foot of page 1

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1 {EX000001592/1}, 10.51, to you, copied to Paul Dunkerton
 2 and indeed others. He says:
 3 "Dear Cate,
 4 "Yesterday was the project meeting for Grenfell. I
 5 will answer your questions as best I can. Paul Dunkerton
 6 might be able to forward to the right person in the TMO
 7 if you need further clarification."
 8 Then he answers your questions, do you see?
 9 Over at the bottom, he goes on to the next page, and
 10 there is a plan on page 2 {EX000001592/2}, and
 11 underneath the plan, do you see, it says "Fire fighting
 12 lift -- no"; do you see that?
 13 A. Mm-hm.
 14 Q. Then he says:
 15 "Fire rating -- not sure but the lifts were
 16 refurbished a few years ago. Paul, might you be able to
 17 clarify.
 18 Then he says:
 19 "IMG 5870 -- Existing lift doors."
 20 Do you see that?
 21 A. Mm-hm.
 22 Q. Now, that told you at least that the lifts were
 23 refurbished a few years ago. Did Mr.
 24 Dunkerton ever clarify the information about that
 25 with you?

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1 A. Not to my knowledge, no.
 2 Q. Did you chase it up from him?
 3 A. I don't -- I don't believe I did, no.
 4 Q. Why is that?
 5 A. Because I think in the risk assessment there were quite
 6 a number of -- quite a number of references to
 7 a firefighting and evacuation lift, which, being the
 8 fire risk assessment and being done by somebody who is
 9 competent in fire safety, you would take to be the case.
 10 If they had been refurbished, again, we wouldn't
 11 assume that they had been done in anything but
 12 a competent manner, as you would do as a responsible
 13 person, so I'd ... if the lifts were indeed refurbished,
 14 then ... then it wouldn't cause any alarm bells to go
 15 off particularly.
 16 Q. You see, we know that you emailed Paul Dunkerton on
 17 13 August, three days later than this, in order to ask
 18 him for the FRA. We have seen that. My question is:
 19 why didn't you follow up the question about the lifts
 20 with him when asking him for that information?
 21 A. I don't -- I don't know. I don't know. Possibly
 22 because I was looking for answers from the assessment.
 23 I can't recall. It's --
 24 Q. Did you ask Mr Sounes or anybody else for any further
 25 information before starting work on your draft strategy?

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1 A. I can't recall. I know I had several conversations with
 2 Bruce, but timeline, I wouldn't be able to tell you.
 3 Q. Did you request any fire safety policies?
 4 A. No, I don't think so.
 5 Q. Did you request any fire safety management policies or
 6 procedures?
 7 A. No, I didn't --
 8 Q. Did you request any maintenance records, such as records
 9 for the AOV or the lifts?
 10 A. I didn't, but I wouldn't normally ask for maintenance
 11 records for a fire safety strategy, looking at the
 12 design of the building principally.
 13 Q. I don't understand. If you are looking at the existing
 14 fire safety strategy for the building, why don't you
 15 want to know whether the lifts are working or not?
 16 A. We're looking at a building in terms of its component
 17 parts for fire safety principally in the desktop study
 18 that I was requested to do. With that information and
 19 the fire risk assessment and management documents that
 20 the responsible people hold, all those documents come
 21 together to form a suite of documents to which they can
 22 refer.
 23 It was never my understanding and it was never the
 24 intention of the document to be a holistic fire safety
 25 audit of the building. That's something quite

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1 different, and certainly not something that was in the
 2 scope of works that was to my understanding when
 3 I started doing it.
 4 Q. If, for example, the AOV, the smoke vent system, was
 5 there but very old and not working, is that not
 6 something you would want to know when crafting your
 7 strategy?
 8 A. With these items, the items that we didn't have enough
 9 information on, we do -- as I recall, having read it
 10 further recently, the fire strategy does ask for
 11 things -- items such as that to be checked and
 12 investigated, so that, you know, we would have the
 13 confidence to say that those items could be part of the
 14 building, I suppose. But --
 15 Q. Indeed.
 16 A. You know, so it was in the strategy that we needed to
 17 check these things.
 18 Q. So my question really again: why didn't you ask for,
 19 for example, the maintenance records for the AOV?
 20 A. Because we asked for -- it was my understanding at the
 21 time, having read some of the information which was sent
 22 through to us, that the shaft was to be upgraded or
 23 maintained or some areas of the shaft were being
 24 refurbished. So I suppose, in a way, it would have
 25 negated any maintenance records for that, because it was

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1 going to be refurbished. But as it stood at the time,
 2 we asked for it to be checked.
 3 Q. You at the time, as we have seen from the 17 August
 4 email, to which we will return, didn't know very much
 5 about the refurbishment strategy.
 6 A. No.
 7 Q. So you weren't able to make a decision not to explore
 8 the maintenance records of, for example, the AOV, were
 9 you?
 10 A. Well, I do know that some of that information did relate
 11 to the mechanical shaft. I think that's why in the
 12 strategy there's quite a lot of information on the shaft
 13 and does mention the refurbishment to it, so ...
 14 Q. But that would all be in the future. You were asked to
 15 provide an existing fire safety strategy for the
 16 building.
 17 My question quite simply is: how could you produce
 18 a reliable safety strategy for the client so that the
 19 occupants of the building would be safe without,
 20 for example, knowing whether the AOV system worked
 21 properly?
 22 A. My answer to that really is because the document wasn't
 23 intended to look at the maintenance of the building;
 24 that was for the fire risk assessment, which is clear in
 25 the fire risk assessment that that's -- the maintenance

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1 and management and operation of the building is
 2 an integral part of that process, that's what you do in
 3 a fire risk assessment. But a fire safety strategy
 4 looks at the design of the building and whether that
 5 building can then be managed successfully for that
 6 design, rather than looking at it from a point of view
 7 of the management procedures and the maintenance.
 8 That's -- it almost becomes a hybrid, if you will, with
 9 a fire risk assessment, which is why I'm kind of
 10 differentiating between what we were doing for
 11 a strategy and what I would consider to be part of
 12 a full audit, which it was never intended to be.
 13 So that's why we wouldn't have asked for those
 14 matters.
 15 Q. The fire risk assessment that you had on 13 August was
 16 dated 29 December 2010, so it was nearly two years out
 17 of date by the time you got it.
 18 A. Okay.
 19 Q. We can see that, 20 months or so out of date.
 20 Would you not have wanted to have had updating
 21 maintenance information about, for example, the lifts or
 22 the AOV system so that you knew the current state of
 23 those fire safety devices or measures from which you
 24 could build a reliable safety strategy?
 25 A. Again, I would say that as long as we had the

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1 infrastructure and that infrastructure was being,
 2 you know, maintained by the responsible people, which
 3 is -- you know, was one of the assumptions of the
 4 strategy, then we wouldn't delve into the service
 5 records, et cetera, of various individual components of
 6 the building.
 7 Q. Does that explain why you didn't ask for training
 8 materials?
 9 A. Yes, it's the same principle.
 10 Q. Or the fire safety organisational structure for those
 11 responsible for the building?
 12 A. That's a matter for the fire risk assessment.
 13 Q. Or a full list of active and passive fire protection
 14 measures and their status?
 15 A. Again, that's part -- that would be part of the fire
 16 risk -- fire safety strategy, and they are component
 17 parts of it. But the others, no, we wouldn't
 18 necessarily ask for those in that depth.
 19 MR MILLETT: Mr Chairman, just two more questions, if I may,
 20 before the break.
 21 SIR MARTIN MOORE-BICK: Mm-hm.
 22 MR MILLETT: Did you request information about the current
 23 evacuation policy at the time?
 24 A. Was this post or after I had received the fire safety --
 25 fire risk assessment?

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1 Q. At the time you sent your draft report to Dr Barker on
 2 15 August for her to --
 3 A. Yes. So, yes, my understanding was that it was
 4 a remain-in-place strategy for the resi and would have
 5 been simultaneous for the rest of the building.
 6 Q. Did you understand what it relied on, the stay-put
 7 strategy?
 8 A. Yes.
 9 Q. What was that?
 10 A. A high degree of compartmentation and various
 11 fire safety measures in relation to the fire service
 12 facilities and ventilation of the lobby.
 13 MR MILLETT: I see, thank you.
 14 Ms Cooney, Mr Chairman, that is a convenient moment
 15 for a break. I have come to a new topic.
 16 SIR MARTIN MOORE-BICK: Good, thank you very much.
 17 Ms Cooney, we are going to have a break now, so you
 18 and others can get some lunch.
 19 We will resume at 2 o'clock, please, and please
 20 don't talk to anyone about your evidence or anything to
 21 do with it while you are out of the room.
 22 THE WITNESS: I won't. Thank you.
 23 SIR MARTIN MOORE-BICK: Thank you. Would you like to go
 24 with the usher, thank you.
 25 Good, 2 o'clock, please. Thank you.

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1 (1.03 pm)
 2 (The short adjournment)
 3 (2.00 pm)
 4 SIR MARTIN MOORE-BICK: All right, are you ready to carry
 5 on?
 6 THE WITNESS: Yes. I am, thank you.
 7 SIR MARTIN MOORE-BICK: Thank you.
 8 Yes, Mr Millett.
 9 MR MILLETT: Thank you, Mr Chairman.
 10 Ms Cooney, thank you. Just a couple of follow-up
 11 questions flowing from the topic we were examining
 12 before lunch.
 13 First of all, did you ever ask Mr Sounes or
 14 Dr Barker for a history of the previous fires at
 15 Grenfell Tower?
 16 A. No.
 17 Q. Why is that?
 18 A. It wouldn't be normal in something that you would pick
 19 up in a fire safety strategy. It would be more -- that
 20 is a standard question for a fire risk assessment.
 21 Q. Just generally, as at 2012, what was your awareness in
 22 general of the history and experience of fires in
 23 high-rise residential buildings?
 24 A. Generally in line with what you might expect from
 25 somebody doing the job I was doing. So, yes, I was

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1 aware of various landmark fires.
 2 Q. Any landmark fires stand out in your mind?
 3 A. Lakanal. There was -- I believe there was a couple of
 4 cladding fires, quite a big one in France, there was one
 5 in Scotland as well, was there?
 6 Q. Yes, indeed.
 7 A. Various fires I was aware of, yes.
 8 Q. You mention Lakanal. From the fire safety engineer's
 9 perspective, what was the big lesson learned from the
 10 Lakanal House fire?
 11 A. The -- from my understanding of it, there were two major
 12 causes of the fire: that's the external walls, spread
 13 over the external walls of the building, and there were
 14 compartmentation defects because of the scissor stairs.
 15 Q. There were. But what was the takeaway, if I can use
 16 that expression, for a fire safety engineer such as
 17 yourself?
 18 A. Takeaway was to ensure that the building materials were
 19 appropriate for the building, and that any defects,
 20 repairs, et cetera, were ... well, shouldn't happen in
 21 the first place, but --
 22 Q. Well, never mind that.
 23 A. -- if they -- were mediated.
 24 Q. Can I ask you, then, to look at your draft existing fire
 25 safety strategy. That's {TMO10001925}. There it is.

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1 Have you read it recently?
 2 A. Yes, I have.
 3 Q. So I can take it, can I, that you're familiar with it?
 4 A. Yes.
 5 Q. Okay.
 6 Now, it's dated, as we can see at the bottom of
 7 page 1, 16 August 2012, and it's marked as a draft,
 8 watermarked as such, across the front and indeed all
 9 other pages.
 10 We can see from the second page {TMO10001925/2} that
 11 it's prepared by you and reviewed by Dr Clare Barker,
 12 principal consultant. Do you see that?
 13 I'm going to come back to that review process later,
 14 but can I just show you something above that box. There
 15 is a smaller box which says, "Reason for revision", and
 16 it's issue number D01. Is the D draft?
 17 A. It is, yes.
 18 Q. Right. And, "Reason for Revision: First Draft".
 19 A. Yes.
 20 Q. Does that tell us that what you produced, this document,
 21 was -- clearly it is a first draft, but that there was
 22 intended to be perhaps a further draft and then a final
 23 version?
 24 A. Typically that would be the process, yes.
 25 Q. Right.

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1 Can you explain why the document was issued with the
 2 word "draft" over it if it was the final version?
 3 A. It wasn't the final version.
 4 Q. Have you seen -- I'm so sorry.
 5 A. Sorry, I don't know whether that's what you understood
 6 by my last response, but it was just a first draft.
 7 Q. Did you ever do a further draft?
 8 A. No.
 9 Q. Do you know whether anybody else ever did a further
 10 draft?
 11 A. Not that I'm aware.
 12 Q. Have you ever seen a final version of this document?
 13 A. No, I haven't.
 14 Q. Would it be usual for you, as the drafts person of this
 15 document, not to see a final or the final version of the
 16 document that went to the client?
 17 A. It really depends on feedback, to be honest. So
 18 a document would remain as a draft until all parties
 19 were satisfied that it covers everything it needs to
 20 cover.
 21 Q. Very well. We will come back to that in due course.
 22 We see on page 3 {TMO10001925/3} the contents page,
 23 if we can just look at that, and you can see there that
 24 from part 3 onwards you have addressed the main
 25 functional requirements, B1 to B5; yes?

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1 A. Yes.
 2 Q. From B1 to B5 at parts 3 through to 7.
 3 Now, despite the fee proposal referring to
 4 section 20 of the London Building Act 1939 and also the
 5 RRO, as we talked about earlier, there is no mention of
 6 those in the contents page, is there?
 7 A. There isn't, no.
 8 Q. Do you know why that is?
 9 A. I think principally because when we're looking at a fire
 10 safety strategy, whilst it does ... there are large
 11 overlaps with the RRO, and obviously the local Acts such
 12 as the London Act and others, which have now been
 13 repealed, would be ... there's quite a lot of
 14 overlapping requirements, so the information in terms of
 15 what we had for those elements, I probably didn't have
 16 enough information to really complete a full section on
 17 those at that time.
 18 Q. I see.
 19 If you go, please, to page 5 {TMO10001925/5} we can
 20 see the introduction, and you can see what's set out
 21 there. In the fourth paragraph of the introduction, do
 22 you see it says:
 23 "It is expected and therefore assumed that the
 24 existing building has been built to the prevailing
 25 standards of the day ..."

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1 Do you see that?
 2 A. Mm-hm.
 3 Q. Can you just read the rest of that paragraph to
 4 yourself.
 5 (Pause)
 6 A. Yes.
 7 Q. Now, on what basis did you form that expectation or
 8 assumption?
 9 A. On the basis that the building having been long-standing
 10 in the same use as it was constructed to be used for,
 11 and the very stringent adherence to Acts such as the
 12 London Act, section 20, et cetera, and the requirement
 13 for a fire risk assessment being in place for several
 14 years prior to, I think it was a reasonable assumption
 15 to assume that any works that had been carried out had
 16 been done in a workmanlike manner, and that there was no
 17 significant deviations from the guidance.
 18 Q. Did you take any steps to ask the TMO or investigate
 19 with them or indeed Studio E whether the existing
 20 building had been built to the prevailing standards of
 21 the day?
 22 A. No.
 23 Q. Why is that?
 24 A. Because the layout of the buildings -- the building,
 25 from the information we had, gave that information

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1 within it in enough detail.
 2 Q. Right. So can I take it from that answer that you took
 3 no steps to verify that the existing building had indeed
 4 been built to the prevailing standards of the day?
 5 A. I didn't ask for certification or anything like that,
 6 no, I didn't.
 7 Q. If you look at the fifth paragraph, the existing fire
 8 safety strategy states:
 9 "It is assumed that the various provisions required
 10 by ... the above legislation have been maintained since
 11 the building was constructed and subsequent amendments
 12 have been carried out with the approval of the
 13 regulating authority of the day."
 14 Do you see that?
 15 A. Mm-hm.
 16 Q. When you talk about various provisions being maintained,
 17 what do you mean?
 18 A. So if there's -- compartmentation, so if there's works
 19 been carried out which creates holes, that they have
 20 been properly sealed; that everything's been maintained
 21 as it should be, so lifts, risers, dampers, any kind of
 22 system which relies on maintenance detection systems,
 23 things of that manner.
 24 Q. Just to be clear, do you mean there that it was assumed
 25 that the building had been maintained to comply with the

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1 prevailing standards at the time of construction?
 2 A. No, so maintain so that they would meet their
 3 performance requirements to -- for the time that they
 4 were put in, or as amended, I suppose.
 5 Q. Right.
 6 On what basis did you make these assumptions that
 7 you set out here?
 8 A. Reasonable good practice.
 9 Q. Right. Again, am I to take it that you didn't ask the
 10 TMO or Studio E as to whether those assumptions were
 11 sound?
 12 A. I did ask some questions about the ventilation and the
 13 detection systems, and we asked quite extensively for
 14 checks to be made on the existing compartmentation and
 15 cavity barriers, if present, in the external or internal
 16 of the building. There were quite a number of
 17 recommendations within the report to look at these items
 18 that assumptions are based on, yes.
 19 Q. What steps, if any, did you take to verify that any
 20 amendments to the building satisfied the relevant
 21 legislation or guidance?
 22 A. I didn't take any. Like I said, I didn't ask for any
 23 certification or completion certificates. Whether they
 24 were even available, I don't know.
 25 Q. Right.

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1 Would it be normal, in your practice, to proceed to
 2 provide a draft fire safety strategy for an existing
 3 building by making assumptions of that nature?
 4 A. Yes, I think it's reasonable to assume various things.
 5 Q. I didn't ask you whether it was reasonable, I asked you
 6 whether it was normal for you.
 7 A. It's normal if it's reasonable, yes. I mean, one does
 8 make assumptions on various things, and that is normal.
 9 There was nothing unusual or not normal about the layout
 10 of the building.
 11 Q. Right. So the answer to my question is: it was your
 12 normal practice to proceed on assumptions such as those
 13 without investigating them?
 14 A. Yes, if I assumed it to be reasonable, yes. It depends
 15 what it was, but yes.
 16 Q. I see.
 17 Now, you haven't, I think, anywhere in this
 18 introduction identified what the current safety
 19 legislation and guidance is, for example the Building
 20 Regulations 2010 or the provisions in the guidance in
 21 ADB, Approved Document B. We can see that you haven't
 22 done that. Can I ask why not?
 23 A. Because the building is existing, really. So the whole
 24 of the construction of the building pre-dates any -- it
 25 pre-dates modern building regulation, and as we

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1 discussed earlier this morning, where we have
 2 an existing building, just because it doesn't follow the
 3 letter of current guidance doesn't make it unsafe, and
 4 it's not a gap analysis between the two; it's a bringing
 5 together of all that information and a consideration of
 6 whether it is safe or not, rather than trying to push
 7 something into guidance which is more modern than the
 8 building itself .

9 Q. Okay, I think that's an answer to a different question.
 10 Let me try to get at it a different way, if I can,
 11 Ms Cooney.

12 You frequently refer in this report -- and we will
 13 see them in due course -- to current regulatory
 14 standards, but you don't identify what they are. The
 15 question is: why don't you do that? Why don't you say
 16 "Building Regulations" and set out the provision?

17 A. They were the current legislative standards. It could
 18 have been clearer, I suppose, but I didn't ... I didn't
 19 put it in because they were the prevailing standards of
 20 the day, I suppose.

21 Q. I see.

22 What expertise, experience or knowledge were you
 23 assuming on the part of your reader when referring to
 24 current regulatory standards?

25 A. As it was a document to inform the design team and

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1 essentially our London office, a reasonable level of
 2 knowledge.

3 Q. Right.

4 Now, in the sections which follow this introduction,
 5 can you see halfway down the page, you give a brief
 6 description of the building and you start with
 7 level 1/ground, and you then go up, level 2/mezzanine,
 8 level 3/walkway/deck. I just want to pick up a couple
 9 of those.

10 In level 2, mezzanine, do you see, you say in the
 11 third sentence:

12 "All accommodation on the ground and mezzanine
 13 levels are assumed to be under the same management."

14 You see that?

15 A. Yes.

16 Q. Then you say under the next level, level 3/walkway/deck,
 17 in the fourth line you say:

18 "This is assumed to be separated from the
 19 fire fighting lobby with 2 hour construction and 1 hour
 20 fire doors."

21 I take those together, Ms Cooney, for the sake of
 22 speed, but on what basis did you make those assumptions,
 23 do you think?

24 A. The fact that it was a building run by a large
 25 organisation, and having a very substantial residential

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1 element to it. So whether or not the accommodation at
 2 the lower levels was within the same management,
 3 organisation, that is of the residential areas or not,
 4 it would have to meet the higher standard. So we would
 5 apply the higher -- the higher standard of fire safety
 6 to it.

7 Q. Well, maybe, but just so I understand your evidence, are
 8 you saying you assumed -- taking the second of those
 9 passages I've shown you -- that the external stair would
 10 be separated from the firefighting lobby with two-hour
 11 construction and one-hour fire doors because the TMO was
 12 a large organisation and the building had a substantial
 13 residential element to it; is that what you are saying
 14 is the basis of the assumption?

15 A. No.

16 Q. What is the basis of that assumption?

17 A. If I could just read this.

18 Q. Please do.

(Pause)

20 A. I'm not quite sure why you're drawing the two items
 21 together. Is that something I could ask for
 22 clarification on, please?

23 Q. What was the factual basis or informational basis on
 24 which you made the assumption that you have set out
 25 there?

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1 A. Because the building was over a certain height, that
 2 would require that level of fire resistance, both under
 3 modern-day guidance, contemporary guidance, as far as
 4 I was aware, and the London Act. So you would assume
 5 a building of that long-standing nature would have that
 6 level of fire resistance. Whether that was under the
 7 same management or not, you would expect the building to
 8 have been built in a robust manner.

9 Q. So is the answer to the question that you assumed that
 10 the building was compliant without further investigation
 11 in that respect?

12 A. Again, I don't think it's a ... it's a reasonable
 13 assumption for such a robust constructional method to
 14 provide that level of fire resistance.

15 Q. Ms Cooney, I'm sorry to be difficult. It may or may not
 16 be a reasonable assumption, that's not a matter I'm
 17 asking you about, and it's not, with great respect,
 18 a matter for you to tell us about. What I'm after is
 19 what happened at the time.

20 I'm going to ask the question once more.

21 Did, in fact, at the time, you assume that the
 22 building was compliant in this respect without further
 23 investigation?

24 A. In respect of its elements of structure, yes, I would,
 25 given its construction.

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1 Q. Now, can I ask you to look at page 7 {TMO10001925/7},
 2 please. You set out three purpose groups there. Do you
 3 see?
 4 A. Yes.
 5 Q. Residential, assembly and offices. I don't think you
 6 provide any information there about the characteristics
 7 of the occupants under any of those purpose groups, do
 8 you?
 9 A. Could you clarify what you mean by characteristics?
 10 Q. Yes, I can. So for residential, we don't see any
 11 information there, either given or requested or
 12 identified as missing, about the characteristics of
 13 individual occupants of the residential premises?
 14 A. That is inherent in the purpose group. So Approved
 15 Document B breaks buildings down into different purpose
 16 groups and applies different levels of various
 17 fire safety matters to each purpose group. For example,
 18 an office building would be generally assumed to have
 19 awake and familiar occupants in it, that is inherent in
 20 the purpose group, whereas residential 1A would be
 21 flats, where you would expect people to possibly be
 22 asleep and be familiar with the building. So they are
 23 inherent in those purpose groups.
 24 Q. When you did this report, did you consider specific
 25 issues relating to the management of fire safety for

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1 people who might need assistance in the event that they
 2 had to escape from a fire?
 3 A. I recall not having really had sufficient information
 4 for the lower floors, but for a residential building
 5 with a stay-put policy, the place of refuge or the
 6 manner of evacuation for all people is to remain in the
 7 flat where they would be -- given, you know, the design
 8 scenario of flats generally, where they would be in
 9 a place of safety for a defined period of time.
 10 Q. Right, okay. We will come back to stay-put shortly.
 11 Can we start, then, with requirement B1, "Means of
 12 Warning and Escape". This is dealt with on page 8
 13 {TMO10001925/8} and following at paragraph 3.2. Do you
 14 see? You set out there whether there are adequate
 15 facilities for the early warning of fire.
 16 A. Yes.
 17 Q. Would it be fair to say that in this section you have
 18 said that a lot of information is unknown and you have
 19 made a number of assumptions, just generally?
 20 A. There are a number of assumptions, yes.
 21 Q. Let's look at some of them.
 22 For example, levels 1 and 2 in paragraph 3.2.1, do
 23 you see there, you say:
 24 "It is unknown whether the community areas and
 25 nursery are covered by an automatic fire detection

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1 system (AFD) or a manual system triggered by manual call
 2 points."
 3 Do you see that?
 4 A. Yes.
 5 Q. Is that not something that you could have found out?
 6 A. Yes, and it's information that will probably have
 7 informed a further draft, but the fire risk assessment
 8 didn't cover those areas, so at that point we didn't
 9 have enough information to say yes, it's one thing or
 10 another. It is therefore written in that manner.
 11 There are areas where there wasn't sufficient
 12 information, and, you know, we would have expected some
 13 feedback from that.
 14 Q. Right.
 15 Let's just look a little further down, then.
 16 Perhaps we can take this quickly.
 17 3.2.3 at level 4:
 18 "It is unknown whether the office/doctors levels are
 19 covered by AFD, again this may not have been required."
 20 Do you see that?
 21 A. Yeah.
 22 Q. Again, that's something that you could have found out,
 23 isn't it?
 24 A. We could have found out, yes, but the -- again, for the
 25 point of which this draft was prepared, and it is only

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1 a draft, so there are going to be areas which require
 2 further clarification, we didn't have that information
 3 at the time. So it's not unusual to have that as
 4 a holding statement, if you will, until we have further
 5 information.
 6 Q. I see.
 7 Just pursuing this further, 3.2.4, "Individual
 8 Apartments":
 9 "All apartments on the residential floors contain an
 10 entrance hallway. It is assumed that the apartments
 11 include smoke detection to at least the protected
 12 entrance hall, but it is unknown whether this is a mains
 13 operated AFD ..."
 14 Again, that's something that you could have found
 15 out, isn't it?
 16 A. The risk assessment, as I remember, wasn't particularly
 17 clear on this, whether it was -- it seemed to be
 18 a little bit of an ad hoc provision, and the report does
 19 later say to upgrade it if it's not to a current
 20 standard. So with matters such as this where it is
 21 a key element of the design, it is brought up later in
 22 the report.
 23 Q. These are all matters that you could have found out for
 24 yourself, either by a site visit or by asking Mr Sounes
 25 or the TMO, before you signed off on this draft and sent

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1 it to Dr Barker.
 2 A. Some of the information we could have done, but there
 3 was a deadline for the first draft to go out, so that's
 4 probably why that information wasn't there at that time.
 5 Q. Right.
 6 You haven't identified any of these as matters for
 7 the client to verify and bottom out so that they could
 8 then come back to you for the next draft. Why is that?
 9 A. I don't agree with that. There are several
 10 recommendations within the report that they actually do
 11 check various matters and, if they don't comply, to
 12 either upgrade or, you know, we need more information to
 13 see what the state of play is with that, so ...
 14 Q. I'm talking about these ones, these three. You just
 15 leave it on the basis that it's unknown. You don't say,
 16 "These matters need to be verified before a final report
 17 is signed off and sent out".
 18 A. No, I didn't put it in those terms, but in order for
 19 this document to move on, they are elements which we
 20 would require further information on, and that is
 21 detailed --
 22 Q. We may be able to cut things short, then, because I have
 23 a number of questions about assumptions, but am I to
 24 take it from that answer, based on the three examples
 25 I've shown you on this page, that where we see "it is

1 unknown" or "it is assumed", those were, in your
 2 language, placeholders to be verified by the client so
 3 that the final version would have the accurate and
 4 up-to-date information in it?
 5 A. Generally. Generally, yes, but I can only give
 6 information on -- I can only make assumptions if I don't
 7 have sufficient information to work from.
 8 Q. At what stage would that verification and second draft
 9 which would identify these matters occur?
 10 A. Usually, typically, normally, whichever word you want,
 11 feedback from the design team would advise various
 12 matters where there is some uncertainty within a report,
 13 and then that would be incorporated in the report and we
 14 would move on to the next iteration, until everybody was
 15 happy with it.
 16 So can we assume that that's the case? Possibly,
 17 yeah, without going through them all one by one.
 18 Q. So when you sent this report on 15 August to Dr Barker,
 19 why didn't you say to her something like, "You will see
 20 that this report contains a huge number of unknowns and
 21 assumptions that I have had to make, we need to sort
 22 these out with the client before we finalise the
 23 report"?
 24 A. I don't know whether we discussed that afterwards or we
 25 didn't. Like I said before, I sat adjacent to Clare, so

1 we did do a lot of communicating just verbally between
 2 us, so I wouldn't necessarily have put that in writing.
 3 Q. Would that verification process with the client and
 4 further draft happen before or after she signed off on
 5 your draft?
 6 A. Typically after, because it's draft 1. So that
 7 iteration would go out to the client for their comment
 8 and feedback. We would assess that and discuss it and
 9 we would move on to the next -- the next draft. It's
 10 not unusual for there to be several drafts before the
 11 document is issued.
 12 Q. Right.
 13 Can I just ask you to look at something. It's
 14 something called PAS 911 of 2007, "Fire strategies --
 15 guidance and framework for their formulation". Have you
 16 heard of something like that?
 17 A. I don't -- I'm not familiar with that particular --
 18 Q. I'll show it to you. It's BSI0000066. That's it.
 19 This is the first page of it. It is not
 20 a British Standard, it's a PAS. You know the difference
 21 between the two?
 22 A. Publicly available specification.
 23 Q. Exactly, thank you, and it's promulgated by the BSI and
 24 some people called Kingfell.
 25 Can I ask you to go to the bottom of page 2

1 {BSI0000066/2}, please. You will see there it's
 2 published in August 2007. Do you see?
 3 A. Mm-hm.
 4 Q. Is this a document that you and others at Exova would
 5 have used at the time?
 6 A. No.
 7 Q. It's not?
 8 A. No.
 9 Q. Okay.
 10 If I could just ask you one or two questions on it,
 11 then. Page 31, please, which is actually page 37 of the
 12 digital {BSI0000066/37}, page 31 internally,
 13 paragraph 7.1.3, this sets out fire strategies for
 14 existing buildings. Do you see?
 15 A. Mm-hm.
 16 Q. It says:
 17 "For existing buildings, all the Fire Strategy
 18 Inputs given in Figure 1 [which we don't have to worry
 19 about] will be applicable to a greater or lesser extent.
 20 Where no other guidance exists, the flow chart given in
 21 Figure 7 could be followed. This covers the
 22 following ..."
 23 Then it sets out a list of things, including d)
 24 "Site Activities", do you see that?
 25 A. Mm-hm.

1 Q. "For existing buildings this will incorporate audits and
2 surveys of the building, occupants, services, systems,
3 etc."

4 I know you may not have seen or didn't use this
5 guidance at the time within Exova, but would that set
6 out a general principle to which you would adhere when
7 producing an existing fire safety strategy report?

8 A. Insofar as it is applicable to the scope that we're
9 doing, yes.

10 Q. Right.

11 Looking at 7.1.3, e), "First Review", bottom of the
12 page:

13 "Collation and review of information received with
14 relevant stakeholders. Where the information is found
15 insufficient or ambiguous, further investigations may be
16 required. This may include, for instance, the
17 requirement for system health checks. This will involve
18 one or more meetings with stakeholders."

19 Again, I preface the question by recognising that
20 you may not have used this precise policy at the time
21 within Exova, but would that represent a general
22 principle when going about producing an existing fire
23 safety strategy such as the one you did for
24 Grenfell Tower?

25 A. Erm ... yes, to -- as a general principle. As a general

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1 principle, yes.

2 Q. Okay.

3 Now, we can put that away and go to the back to the
4 report, please, {TMO10001925/8}, subsection 3.2.1,
5 "Levels 1 and 2". You say there:

6 "It is unknown whether the community areas and
7 nursery are covered by an [AFD] ..."

8 We have looked at that a moment ago.

9 Now, it is right, isn't it, that at the time you
10 sent this in draft form to Dr Barker, the TMO had
11 provided you with the FRA from Carl Stokes? We saw that
12 earlier today.

13 A. Yes.

14 Q. Let's look at that. It's at {TMO10037743/12}, please.
15 You will see that there is a box which refers to AFD in
16 the staff kitchen; do you see that?

(Pause)

17 Sorry, I should point it out. It's the top box,
18 second paragraph:

19 "There is suitable automatic fire detection in this
20 area to give early warning to a fire situation, there is
21 no extraction system in the cooking area ..."

22 Do you see that?

23 A. Mm-hm.

24 Q. When you wrote your report, where you say it is unknown

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1 whether the community areas or nursery are covered by
2 an AFD, had you not read this page of the FRA which
3 refers to an AFD in the staff kitchen?

4 A. I will have done.

5 Q. Can you account for why the report doesn't identify that
6 or why you say it's unknown whether the community areas
7 and nursery are covered by an AFD?

8 A. It only relates to a certain area. I don't know how
9 extensive the automatic fire detection is, what standard
10 it's at, so rather than ... I mean, it's a partial piece
11 of information, so --

12 Q. Yes. Again, isn't this something that you could have,
13 once the question had arisen, found out for yourself,
14 either by picking up the phone to the TMO or Mr Sounes
15 or sending an email, or collating all these unknowns and
16 assumptions and coming down for a site visit?

17 A. Absolutely, you know, we can ask for all of that
18 information. I think at the time -- and, again, I keep
19 coming back to this point -- it was a draft 1 report.
20 So the report in and of itself was, you know, as it
21 stood at that particular time, and, as I say, there will
22 be bits -- areas which can be further added to and made
23 clearer and assumptions can be confirmed.

24 But at that time, I must have felt that there wasn't
25 sufficient information to say that it was -- you know,

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1 to know what that detection system actually meant.

2 Q. Did you ask James Lee, when you had access to him, if he
3 had noted on his site visit whether automatic fire alarm
4 and detection was provided?

5 A. I do remember speaking about detection in the common
6 areas of the residential areas. There was detection in
7 there. I don't know whether he went into the other
8 areas, whether they were available to him at the time
9 that we attended.

10 Q. Right. Okay.

11 I mean, going back to the question before last and
12 the answer you gave about it only being a draft, I can
13 understand that it's only a draft, but my question is:
14 did it need to be so draft in circumstances where you
15 could have picked up the phone to the TMO or to
16 Mr Sounes or done a site visit?

17 A. There's always extra information which you can glean
18 from this kind of point forward. I suppose the question
19 here was that we had a deadline that Studio E wanted
20 some form of a document for, so we did a draft 1.
21 That's specifically why it is, you know, a lot of
22 assumptions.

23 Q. Yes, I see. Yes, thank you.

24 Going back to your report under 3.2.5, "Common
25 Areas", page 8 {TMO10001925/8}, you say:

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1 "An audible fire alarm is not required to common
 2 areas of residential buildings."
 3 Then you go on to say in the second paragraph:
 4 "Evacuation of flats beyond the dwelling of fire
 5 origin would be carried out under the control of the
 6 attending fire service if necessary."
 7 What guidance were you applying when you made that
 8 statement?
 9 A. It's not specifically guidance.
 10 Q. What would you call it, then?
 11 A. When you have a stay-put policy in a building, it is not
 12 typical to have an all-out evacuation. That's the way
 13 that these buildings are designed and have been designed
 14 for many, many years. So in order to evacuate the
 15 building, it's typically the fire service or management,
 16 if they have a presence on site, that would initiate
 17 a full evacuation.
 18 Q. Were you aware at the time you wrote this that the
 19 statutory guidance, so Approved Document B, required
 20 that the building design should be such that there is no
 21 reliance on the fire service?
 22 A. That's what it says in Approved Document B, and I'm
 23 aware of that. But -- however, if there is the need for
 24 an evacuation, then that is typically undertaken by the
 25 fire service advice.

1 Q. I see.
 2 So on what basis, then, did you make the statement
 3 that evacuation of the flats beyond the flat of origin
 4 would be carried out under the control of the
 5 fire service?
 6 A. Whilst it is a ... the design of the building doesn't
 7 rely on the fire service. If there is one, then that
 8 is -- that is the way that buildings are evacuated, on
 9 the advice of the fire service or if the management see
 10 fit.
 11 Q. Did you give any thought to how the building as it stood
 12 at the time might support evacuation of the occupants
 13 from flats beyond the dwelling of fire origin?
 14 A. Yes. Yes, of course.
 15 Q. And?
 16 A. That is part of the fire safety design of residential
 17 buildings, particularly where we have excessive height.
 18 The core of the building has a specified fire
 19 resistance, depending on height. It has the smoke
 20 control, which should maintain tenability for that fire
 21 scenario, and therefore people who aren't directly on
 22 the floor of fire origin should be able to make
 23 an evacuation of the building.
 24 Q. Right. We may come back to that when we look at
 25 stay-put.

1 Coming back up the page to 3.2.3, we looked at the
 2 question of whether the office or doctors' levels are
 3 covered by AFD, you say it's unknown, and you have
 4 explained why you didn't seek to find out.
 5 Were you aware of the TMO's statutory obligation
 6 under Article 8 of the RRO?
 7 A. Sorry, the ... I don't know the RRO articles off by
 8 heart. Which article are you referring to?
 9 Q. Article 8. I'll just give you a little bit of it: to
 10 take such general fire precautions as will ensure, so
 11 far as reasonably practicable, the safety of any of the
 12 building owner's employees, or responsible person's
 13 employees. You were aware of that?
 14 A. Yes.
 15 Q. Were you aware of the TMO's duty under Article 13:
 16 "Where necessary ... in order to safeguard the
 17 safety of relevant persons, the responsible person must
 18 ensure -- that
 19 "(a) the premises are, to the extent that it is
 20 appropriate, equipped with appropriate fire-fighting
 21 equipment and with fire detectors and alarms."
 22 You knew about that?
 23 A. Yes.
 24 Q. Having said it's unknown whether those areas are covered
 25 by AFD, did you think about how the TMO were going to

1 fulfil their duties as a responsible person under the
 2 RRO without providing them with some specific guidance
 3 on those matters?
 4 A. I suppose, without further information, it's not
 5 something that I could have had a firm opinion on.
 6 The -- again, the general fire precautions that are
 7 applied to a building under the RRO are bespoke and,
 8 you know, dependent on the building itself. So whilst
 9 it may say automatic fire detection, the extent of that
 10 varies between buildings. So some buildings may need
 11 nothing other than a manual call point system, which is,
 12 you know, the break glass and a sounder. Others might
 13 need more detection.
 14 So when looking at the RRO, it's really a matter of
 15 applying it to a specific set of circumstances. So, as
 16 we didn't know, I haven't specified a category or
 17 anything along those lines.
 18 Q. Looking at 3.3.1, please, on page 9 (TMO10001925/9),
 19 moving on. "Means of Escape, Evacuation principals",
 20 you say there.
 21 To your knowledge, was there any evacuation strategy
 22 that was already in place?
 23 A. As far as I would be aware, and guided, I suppose, by
 24 the fire risk assessment again and general escape
 25 principles for that type of purpose group within the

1 building, you would use a simultaneous evacuation
 2 approach.
 3 Q. How did you envisage a simultaneous evacuation approach
 4 would be managed?
 5 A. That falls -- the duty falls on the responsible persons
 6 for those areas, whether they're tenanted or an ad hoc
 7 use of space, it would fall down to the people who are
 8 responsible for the people that are in that area.
 9 Q. Was it not your thinking at the time that the
 10 responsible person would want to be able to use your
 11 report in order to inform what evacuation strategy they
 12 should adopt?
 13 A. Yes, in conjunction with the fire risk assessment.
 14 I think there's quite a blurry line here between the two
 15 document types and purposes. So, yes, having that suite
 16 of documents, the general escape strategy would advise
 17 it, advise the principle for escape.
 18 Q. Your strategy doesn't contain any information or
 19 guidance or advice as to how a simultaneous evacuation
 20 strategy would be managed, does it?
 21 A. No, it doesn't, but we wouldn't extent the actual
 22 management provisions within a design document. Again,
 23 it's that suite of documents. It's the strategy, the
 24 fire risk assessment and the management documentation
 25 held by the responsible persons that would bring

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1 together all these parts to be able to run a safe
 2 building.
 3 Q. You call it a design document, and I note from your
 4 evidence this morning that that was an expression you
 5 used. Could you just explain to me what you mean
 6 exactly when you say "design document"?
 7 A. So when buildings are being constructed, to ensure
 8 fire safety, whether it be a change of -- change of any
 9 kind of -- you know, an alteration to a building or
 10 a new building, whatever it may be, there are design
 11 parameters which we use ADB for principally to ensure
 12 an adequate level of safety.
 13 So those matters which are referred to under B1 to
 14 B5 of ADB are design parameters, they're not management
 15 parameters. They're parameters which, if -- once they
 16 have all come together as a design, should be able to be
 17 managed effectively. But it doesn't go as far as to say
 18 what those management parameters ought to be, as long as
 19 it is reasonable to be able to manage that building for
 20 that -- for the design. So that's where the other
 21 documents come in.
 22 Q. Yes.
 23 Is what you're saying actually the existing
 24 fire safety strategy for this building would be based on
 25 an up-to-date fire risk assessment and informed by it,

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1 so that your client could have in its hands a single
 2 document, read either with the up-to-date fire risk
 3 assessment or, if one wasn't available, some pointers
 4 from you, so as to know exactly whether or not the
 5 building was compliant, in what respects it wasn't and
 6 what it should do about it?
 7 A. As a suite of documents, that's essentially -- with the
 8 existing management strategies and provisions that the
 9 organisation holds, those all come together to do that,
 10 yes.
 11 Q. Right. Okay, let's move on.
 12 Looking at 3.3.2, you discuss occupancy of the
 13 boxing club. Page 9, 3.2.2. Do you see the second
 14 paragraph?
 15 A. Mm-hm.
 16 Q. You see there in the second paragraph you talk about the
 17 square footage or metreage of the boxing club and how
 18 it's served, and then travel distances to the exit. You
 19 say:
 20 "An additional exit would be required for
 21 an occupancy exceeding 60 people. The use of this room
 22 is therefore limited by the omission of an alternative
 23 escape route."
 24 That's what you say for the boxing club.
 25 You don't mention any other calculations of

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1 occupancy for any other non-residential parts of the
 2 building, do you?
 3 A. I don't think I do, no.
 4 Q. Why is that?
 5 A. That's a question which is kind of a little bit fuzzy in
 6 my mind, to be honest. I do remember there being some
 7 discussion about areas not being in use at that time,
 8 and there wasn't ... on the plan they weren't large
 9 areas. So when you -- I think the reason I've picked
 10 out the boxing club at this point is because it was
 11 quite a large floor area, and therefore the ability to
 12 have a number of people in there was greater than any of
 13 the other areas of the building. So I think that's
 14 probably why I've pulled out the boxing club as a ...
 15 and looked at the occupancy of it.
 16 Q. Okay.
 17 3.3.3, just a bit lower down page 9, in the first
 18 paragraph there, you identify, I think, contradictory
 19 information in respect of the lift landing doors as
 20 between the original construction drawings and the
 21 existing drawings that were provided. I'm summarising
 22 there, but that's right, isn't it?
 23 A. If I may read the paragraph?
 24 Q. Yes. Let me take it more simply.
 25 First paragraph under 3.3.3, second sentence:

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1 "There is no access to the stair or lifts in the
 2 central core shown on the original construction
 3 drawings, however lift landing doors appear to be shown
 4 on the existing drawings provided."
 5 You see that?
 6 A. Okay.
 7 Q. Did you attempt to verify which drawings were correct?
 8 (Pause)
 9 A. I don't know. I don't know. I would have to look into
 10 that in a bit more detail to actually -- and look at the
 11 drawings that I had.
 12 Q. Let me ask you this way: do you remember trying to get
 13 to the bottom with somebody of which drawings were
 14 correct?
 15 A. I don't recall, to be honest, there was --
 16 Q. Right.
 17 A. I don't recall.
 18 Q. Okay. Let me just pursue that a little bit.
 19 Is that something that you asked James Lee about, do
 20 you think?
 21 (Pause)
 22 A. I can't -- I can't remember.
 23 Q. No.
 24 A. I can't remember.
 25 Q. No.

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1 Is there any reason why you didn't or couldn't have
 2 asked Studio E or insisted on going down for a site
 3 visit in order to sort that out and resolve the
 4 contradiction?
 5 (Pause)
 6 A. Whilst there is a contradiction there, the lift landing
 7 doors being shown in the lobby wouldn't have been
 8 a non-compliance, for want of a better term. Either ...
 9 (Pause)
 10 With the lift landing doors being shown, it wouldn't
 11 have been a concern. It would still have been
 12 satisfactory for them to open into the lobby.
 13 Q. It would have been good to know the answer to the
 14 question, though, wouldn't it, before signing off on
 15 this?
 16 A. It would have clarified that sentence, yes, but I don't
 17 think it would have any material difference to the
 18 design of the building.
 19 Q. All right.
 20 I think it's right that nowhere here, in this part
 21 of the report or in general, do you make any reference
 22 to or provide any discussion of the fabric making up the
 23 compartment walls?
 24 A. The ... I seem to recall that there are references to
 25 the fabric of the internal walls being masonry.

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1 Q. We will see how we go, but you don't do it here.
 2 A. Okay.
 3 Q. Would this not be an appropriate place to identify it?
 4 A. Erm ... it's part of the -- of the many layers of
 5 fire safety within a building, so it could -- it fits
 6 well in lots of different places, to be honest, but ...
 7 Q. All right.
 8 A. It's --
 9 Q. Are you -- sorry, do you want to --
 10 SIR MARTIN MOORE-BICK: Have you finished?
 11 A. Sorry, yeah, I'm sure that information is in the
 12 document somewhere.
 13 MR MILLETT: Right.
 14 I think it's right, though, that you made no
 15 recommendation anywhere in this report for an invasive
 16 test or investigation?
 17 A. No. I don't think I do, no.
 18 Q. Just --
 19 A. Sorry, I do make references to various items being
 20 checked, yes. But -- so in that respect, yes, I made
 21 quite a few recommendations on the construction of the
 22 building.
 23 Q. Yes.
 24 Looking at the first sentence of the second
 25 paragraph, you say:

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1 "If the accommodation communicates with the fire
 2 fighting shaft/ lifts, then the core in this area should
 3 be protected to 2 hours fire resistance and 1 hour fire
 4 doors."
 5 Just on that, you weren't able to say whether those
 6 walls satisfied the requirements for fire resistance
 7 unless you knew what the build-up was.
 8 A. No, we didn't -- well, I had the information of the
 9 original drawings. The information from just looking at
 10 the photographs themselves, the thickness of the walls
 11 and the general appearance of the walls do look masonry.
 12 But, again, I am certain that that recommendation is
 13 also within the report, to check the fire resistance
 14 around the cores.
 15 Q. Right.
 16 Are you familiar or were you familiar at the time
 17 with diagram 52 of ADB?
 18 A. You will have to remind me.
 19 Q. Okay. It's {CLG00000173/116}, please. Here it is. It
 20 has a and b, and I would like to look at a.
 21 I don't think you mention diagram 52 anywhere in
 22 your existing fire safety strategy, do you?
 23 A. No.
 24 Q. Diagram 52a, just looking at it, does it make it clear
 25 that a minimum of 120 minutes of fire resistance should

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1 be provided to a lobby separating non-residential areas
 2 from a firefighting shaft?
 3 A. From that design, yes.
 4 Q. Yes.
 5 That being so, if you could go back to section 3.3.3
 6 of your report we were just looking at a moment ago,
 7 page 9 -- we may need to have these in parallel, but
 8 just go back to that for the moment -- that being so in
 9 diagram 52, why do you say in 3.3.3 of your report:
 10 "As there is a single escape route from the building
 11 at this level, the exit should be lobbied to provide a
 12 minimum of 30 minutes fire resisting construction and
 13 there should be no combustibile materials contained
 14 within the entrance lobby."
 15 I'm interested in 30 minutes; why did you say that?
 16 A. The exit refers to the door rather than -- so if --
 17 going back to diagram 52, the diagram on the right,
 18 where we have a firefighting shaft within a residential
 19 occupancy, the door between the ... between the lobby
 20 and the firefighting shaft --
 21 Q. Would you just go back? Sorry, I appreciate you're
 22 trying to answer. I would like to go back to diagram 52
 23 so everybody can see what you are referring to.
 24 Yes, so sorry, do you want to go back and repeat the
 25 answer?

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1 A. Okay. So going back to what you were saying before, if
 2 you look at the left-hand drawing, where you have the
 3 firefighting shaft and the 60-minute doors -- 60-minute
 4 fire resistance within the shaft itself and the
 5 30-minute doors within the -- so the door that is in the
 6 hatched line would be an hour and the door that's on the
 7 internal line would be half an hour, though it's
 8 a one-hour wall.
 9 Q. I see.
 10 But if you have accommodation, just looking at a,
 11 "Any building", and looking at "Firefighting lobby", you
 12 can see the doors on the left-hand side, those walls
 13 should be 120 minutes' resistance and 60 minutes' --
 14 A. From the accommodation, yes.
 15 Q. So if the accommodation is behind the doors leading into
 16 the firefighting lobby on diagram 52a, they shouldn't be
 17 30 minutes, should they, they should be 60?
 18 A. For that door, yes, but into the stair would be 30.
 19 Q. Into the stair would be 30.
 20 A. Mm-hm.
 21 Q. I can see that.
 22 A. Yeah.
 23 Q. So the question again -- you say:
 24 "As there is a single escape route from the building
 25 at this level, the exit should be lobbied to provide a

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1 minimum of 30 minutes fire resisting construction ..."
 2 A. Could I look at the report?
 3 Q. Yes, of course. 3.3.3, page 9 {TMO10001925/9}, please.
 4 A. Okay, so we're looking here at level 4, which is the
 5 office accommodation, isn't it?
 6 Q. Yes.
 7 A. Yes.
 8 Q. You say in the second sentence:
 9 "As there is a single escape route from the building
 10 at this level, the exit should be lobbied to provide a
 11 minimum of 30 minutes fire resisting construction ..."
 12 I'm really putting to you that it shouldn't be 30;
 13 it should be 60.
 14 A. No, it should be 60, that's quite correct, yeah. That's
 15 a mistake, yeah.
 16 Q. Just before I leave that, are you accepting that that's
 17 an error and instead of --
 18 A. That is an error, yeah, I accept that.
 19 Q. Thank you very much.
 20 3.3.4, page 10 {TMO10001925/10}, you discuss
 21 evacuation principles for the residential accommodation.
 22 Look with me, please, at the third bullet point. You
 23 say:
 24 "Due to an assumed high degree of compartmentation
 25 and therefore a low probability of fire spread beyond

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1 the dwelling of fire origin, simultaneous evacuation of
 2 the building is unlikely to be considered necessary ..."
 3 Do you see that?
 4 A. Yes.
 5 Q. Now, I want to look with you at the words "an assumed
 6 high degree of compartmentation and therefore a low
 7 probability of fire spread".
 8 What information did you rely upon to assume a high
 9 degree of compartmentation?
 10 A. The inherent fire resistance within such a robust
 11 structure would give you a high degree of
 12 compartmentation. The ... there were no, for want of
 13 a better term, red flags within the fire risk assessment
 14 that showed that compartmentation wasn't as you would
 15 expect it to be, and essentially the design of the
 16 building being to -- at its time of construction was
 17 higher than it would need to be for current regulation.
 18 So, again, it is an assumed high degree, but it's ...
 19 it's a reasonable assumption to make, I think.
 20 Q. You started off that answer by saying "The inherent fire
 21 resistance within such a robust structure".
 22 I understand what that might mean, but my question
 23 really is: what investigation did you perform to satisfy
 24 yourself that there was an inherent fire resistance
 25 within such a robust structure?

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1 A. Like I've said, we didn't undertake invasive surveys to
 2 find out, but we did recommend within the report that it
 3 was checked.
 4 Q. So, to be perhaps colloquial, you looked at it, it was
 5 a big 1970s concrete building and you assumed that it
 6 was robust?
 7 A. With the advice to check it, yeah. So it's -- I mean,
 8 it's --
 9 Q. With the advice to check it.
 10 So, first of all, did you cross-reference that
 11 assumption with Carl Stokes' risk assessment?
 12 A. I -- obviously we looked at the fire risk assessment and
 13 the construction and the compartmentation of the
 14 building didn't give us any cause for concerns.
 15 Q. Right.
 16 At paragraph 6.5 of your witness statement -- let's
 17 just have that up, if we can, please. That's
 18 {EX000001590/8}. You say in the second sentence:
 19 "A compartmentation survey is a separate piece of
 20 work, which we were not instructed to carry out. At the
 21 time, compartmentation surveys were not commonly
 22 undertaken, though in my experience they have become
 23 more common since the fire at Grenfell Tower."
 24 The fact that a compartmentation survey hadn't been
 25 carried out, would that not be all the more important

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1 a reason for you to carry out some kind of risk
 2 assessment, even if just examining the thickness of the
 3 walls making up the compartment?
 4 A. I think that was a matter which obviously we caveated
 5 and which is for the fire risk assessor to ensure is
 6 maintained. The building as it stood was, as you say,
 7 a very robust 1970s concrete tower, and there is a great
 8 degree of fire protection in that type of construction.
 9 So whilst, yes, we say, "Make sure and check", it's not
 10 unreasonable to assume that that -- the nature of that
 11 construction is going to give you what you require.
 12 Q. I think I'm right in saying that nowhere in your
 13 strategy do you advise the reader to verify the
 14 assumption or the basis of the assumption that the
 15 building contained a high degree of compartmentation.
 16 A. We didn't ask for it to be verified, no, but, again, it
 17 goes back to that iterative process of drafts. It's ...
 18 with hindsight, yes, I could have made a list of --
 19 I wanted various things, but at the time we went off the
 20 information that we had available to us.
 21 Q. Were you aware at the time that the regulatory
 22 requirement for the elements of structure comprising
 23 compartments in a building such as this was a minimum of
 24 120 minutes of fire resistance?
 25 A. Yes.

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1 Q. But that's not something that you put in your strategy.
 2 Why is that?
 3 A. I'm not sure. I would have to take your word for it.
 4 I was aware of that, and I'm not concerned with that not
 5 being achieved. I think with, you know, events that
 6 happened, that's not an unreasonable assumption to have
 7 made in hindsight, but I would have to again look at the
 8 strategy to see what I actually wrote about the
 9 120-minute requirement, but --
 10 Q. Okay. Let's move on, back to your report, please. Can
 11 I go back to page 9 {TMO10001925/10}. Look at the
 12 second bullet point under paragraph 3.3.4, "Evacuation
 13 principals -- residential", do you see that?
 14 You say there in the second bullet point:
 15 "There is no reliance on rescue for evacuation,
 16 other than via the main core."
 17 Do you see that?
 18 A. Yes.
 19 Q. What did you mean by that?
 20 A. That the ... that the stair in the building was the only
 21 means of escape. So that was the only route vertically
 22 through the building, so --
 23 Q. How does that statement there relate to your earlier
 24 statement at paragraph 3.2.5 on page 8 that evacuation
 25 of flats beyond the dwelling of fire origin would be

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1 carried out under the control of the attending
 2 fire service if necessary? How do those two relate to
 3 each other?
 4 A. The principle of the stay-put policy is that the people
 5 not on the -- not within the flat of fire origin should
 6 be able to remain within their apartment for a defined
 7 period. So it relates to the fact that because of the
 8 ventilation provisions within the common area, other
 9 people, should they feel they need to leave in that
 10 escape time, would be able to use the stair.
 11 Q. Did you ever stand back and ask yourself: how, if
 12 evacuation of flats beyond the dwelling of origin were
 13 to be carried out by the attending fire and rescue
 14 service, they would get everybody out down the single
 15 staircase comprising the central core?
 16 A. I didn't stand back from it from a point of view of
 17 a criticising the prevailing guidance at the time.
 18 That's for others to look at, I suppose, the guidance.
 19 But that is the standard to which buildings of this
 20 nature have been constructed since -- well, in its
 21 present format, since the mid-1980s, so --
 22 Q. Did -- I'm so sorry.
 23 A. So did I stand back and say: is that suitable? I would
 24 say this is the guidance which dictates the design of
 25 these buildings, so if it meets with that guidance, then

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1 I would deem it to be suitable. I wouldn't necessarily
 2 start to base my recommendations on opinions which
 3 haven't been ratified by government.
 4 Q. Right.
 5 Did it occur to you to think about a situation
 6 where, if evacuation of the flats beyond the dwelling of
 7 origin had to be carried out by the attending LFB, and
 8 they had to use the central staircase, other fire
 9 mitigation and protection measures would be needed in
 10 order to assist that evacuation?
 11 A. Not beyond the guidance which is in place to design
 12 those buildings.
 13 Q. Right.
 14 Going back to the third bullet point on page 10,
 15 where we were, we have looked at this before:
 16 "Due to an assumed high degree of compartmentation
 17 ... simultaneous evacuation of the building is unlikely
 18 to be considered necessary ..."
 19 Were there any conditions or situations in which you
 20 contemplated that simultaneous evacuation might be
 21 necessary?
 22 A. Not given the parameters of fire safety design, which is
 23 reliant on many provisions kind of interlinking to
 24 provide a satisfactory level of fire safety. We don't
 25 rely on just a single point of failure. It's a layered

1 approach. So with the robustness of the construction,
 2 the ventilation, the compartmentation, principally, the
 3 likelihood of a full evacuation is very, very small.
 4 So simultaneous evacuation of the entire building
 5 has to be because there is a failure of one of those
 6 elements which is negating all the rest of them, really.
 7 Q. Looking at 3.3.6 on the same page, a little bit lower
 8 down, "Common Areas", in the third line, you say:
 9 "The distance to the stairs from the flat entrance
 10 doors appears to be more than 7.5m from the flats with
 11 entrance doors to the North of the lift shaft, the
 12 maximum [of] which is approximately 8.3m (scaled from
 13 microfiche plans, to be checked on site). This
 14 excessive distance of less than 1m results in an
 15 increase in travel of less than 1 second and would be
 16 considered to be acceptable under current standards and
 17 risk assessment."
 18 Now, you say the distance needed to be checked
 19 on site, or was to be checked on site; what guidance
 20 were you referring to when you say that the travel
 21 distance exceeds 7.5 metres?
 22 A. Relating to modern-day Approved Document B.
 23 Q. Approved Document B, was it?
 24 A. Mm-hm.
 25 Q. Right.

1 Did you intend to check this yourself or ask that it
 2 be checked before this draft was finalised and sent to
 3 Dr Barker?
 4 A. No, hence why I've asked for it to be checked on site.
 5 I believe it was slightly more than that in the -- as it
 6 turns out, but it was scaled, as I say, from quite
 7 grainy drawings.
 8 Q. Indeed. Therefore, who was going to check it on site?
 9 A. I suppose James could have checked it when he was
 10 on site. I don't recall whether I asked him to do that
 11 or whether he did, but it was -- it's clear that it's
 12 something that needed to be checked so that we could put
 13 something more in the document.
 14 Q. Sorry, Ms Cooney, I'm puzzled. You say you suppose
 15 James could have checked it when he was on site, but
 16 this here says "to be checked on site".
 17 A. Yes.
 18 Q. You're not suggesting that you would ask Mr Lee to check
 19 it?
 20 A. Not at that time, no.
 21 Q. Yes.
 22 Now, you know this building is a building with
 23 a single stair, and we know from parts of this report
 24 we're going to come to in a moment that the smoke
 25 control system was unsatisfactory from a modern

1 perspective. You say that in the next section, which we
 2 will come to.
 3 In those circumstances, how were you able to justify
 4 these excessive travel distances?
 5 A. Principally because the travel distances were -- the
 6 excess in the travel distance was relatively small.
 7 Whilst we would design a ventilation system for
 8 a certain extract rate or a certain natural pull to
 9 today's standards, we ... you know, it would have had
 10 some effect, and I think later on in the strategy I do
 11 say that the suitability of the existing system is
 12 dependent on how the fans are working for a mechanical
 13 shaft at that time and for that to be checked.
 14 But the excess in travel distance under normal
 15 design guidance is not unreasonable -- well, it's not
 16 something that would cause great concern.
 17 Q. My question is really whether or not, in saying that you
 18 could afford the excess travel distance because of the
 19 fact that the time increase in travel was less than
 20 a second, you were dependent on a fully functioning AOV
 21 smoke extract system?
 22 A. It's part of the package of measures, yes. I mean,
 23 when --
 24 Q. Yes.
 25 A. -- we have a design for a building, we assume that we're

1 going to have some smoke that leaks into the common area
 2 as the occupants leave the flat on fire, and that the
 3 ventilation system will start to clear that within
 4 a reasonable amount of time.
 5 Now, the excessive travel distance is dependent on
 6 that smoke ventilation system working, and because we
 7 had limited information on how it all worked, that's why
 8 the emphasis on the smoke ventilation checks and design
 9 was put in the strategy.
 10 Q. Yes.
 11 A. So I feel it was brought out in the report quite
 12 strongly to check the ventilation.
 13 Q. Well, let's look at smoke ventilation. This is the next
 14 section, section 3.4, just at the bottom of page 10.
 15 SIR MARTIN MOORE-BICK: Mr Millett, I wonder if the witness
 16 might benefit from a break.
 17 MR MILLETT: Mr Chairman, yes, that's probably sensible.
 18 SIR MARTIN MOORE-BICK: If you are going into another
 19 part --
 20 MR MILLETT: I'm just moving on, but yes, it's a different
 21 topic.
 22 SIR MARTIN MOORE-BICK: Would that be a good idea?
 23 MR MILLETT: Yes.
 24 SIR MARTIN MOORE-BICK: Now, Ms Cooney, we will have a short
 25 break now. Again, please don't talk to anyone about

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1 your evidence or anything to do with it while you are
 2 out of the room. We will come back at 3.25, please.
 3 THE WITNESS: Okay.
 4 SIR MARTIN MOORE-BICK: Thank you very much. Go with the
 5 usher.
 6 Right, 3.25, please. Thank you.
 7 (3.15 pm)
 8 (A short break)
 9 (3.25 pm)
 10 SIR MARTIN MOORE-BICK: Right, Ms Cooney, ready to carry on?
 11 THE WITNESS: Yes, thank you.
 12 SIR MARTIN MOORE-BICK: Thank you very much.
 13 MR MILLETT: Ms Cooney, I'm going to ask you one or two
 14 questions about the next section, "Smoke Ventilation".
 15 Can I ask you, please, to be shown page 11
 16 {TMO10001925/11} of your report. At the bottom there,
 17 in the penultimate paragraph, you say:
 18 "The existing system is unsatisfactory ..."
 19 Do you see that?
 20 A. Yes.
 21 Q. "... from a modern perspective, as the smoke extract
 22 shaft is significantly undersized ..."
 23 Do you see that?
 24 A. Yes.
 25 Q. At the end you say:

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1 "As the ventilation provision is critical to the
 2 stay in place evacuation principle, it is strongly
 3 recommended that the performance of the automatic system
 4 of mechanical ventilation as existing and as proposed is
 5 assessed in order to ensure that a satisfactory level of
 6 safety is provided to the residents throughout the
 7 tower."
 8 Now, "satisfactory level of safety", what guidance
 9 were you relying on to determine what a satisfactory
 10 level of safety would be?
 11 A. Approved Document B would be the benchmark document for
 12 satisfactory level of safety.
 13 Q. Right. So were you saying that the existing smoke
 14 control system in the building was not compliant with
 15 modern standards?
 16 A. I think I'm saying that we don't know enough about it to
 17 be able to say that it is, and therefore we would assume
 18 it isn't.
 19 Q. Right.
 20 In your witness statement -- we can look at it if we
 21 need to -- you say you made a strong recommendation to
 22 the effect that you say it didn't meet current
 23 standards, and you said you make a "strong
 24 recommendation in that regard".
 25 In fact, your recommendation was no more than the

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1 performance of the existing system be assessed.
 2 A. Yes. The upgrade of the -- I think it says here, the
 3 upgrade would not meet the aspiration of achieving
 4 current standards, so that's why I made a strong
 5 recommendation for it to be looked at.
 6 Q. But you are not recommending here that the smoke
 7 ventilation system be brought up to current standards,
 8 are you?
 9 (Pause)
 10 A. No, I'm asking for it to achieve a satisfactory level of
 11 safety. So, as a benchmark, again, we go back to
 12 Approved Document B, which would be the current
 13 standard.
 14 Q. Wouldn't you need to know whether it was compliant with
 15 current standards in order to be able to know whether
 16 what was proposed was a material alteration for the
 17 purposes of Approved Document B?
 18 A. Yes. Yes, you would need to know what it is, and
 19 I think that's what we ask for. We ask for it to be
 20 checked so that we could apply, if you like, the
 21 parameters of a material alteration so that it's -- it
 22 is -- a satisfactory level of safety is achieved.
 23 Whether that is to modern standards is a matter for the
 24 M&E designers, really, but it's a requirement to bring
 25 it up so it's -- it achieves a satisfactory level of

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1 safety.

2 Q. Given the reliance on compartmentation, on stay-put, the

3 single staircase and the excessive travel distances

4 across the lobbies, wasn't it absolutely essential to

5 spell out to the client that they needed to have

6 an upgraded, modern, compliant AOV system, because

7 otherwise the lives of the residents would be at risk?

8 A. I think we do spell out that it needs a thorough looking

9 at. You know, we say it is critical to the

10 stay-in-place evacuation principle. I don't think it

11 could be much clearer than that.

12 Q. Well, a thorough looking at isn't the same as advice to

13 change it out and replace it with something modern and

14 compliant with modern current standards, is it?

15 A. It may or may not be the case. We're looking at

16 something which we haven't got a performance criteria

17 on. So as we don't know what its current state of

18 affairs is, that's why it needs to be looked at. And

19 then obviously if it's not achieving a satisfactory

20 level of safety, then it needs to be remediated.

21 Q. When would this assessment take place? Would it take

22 place prior to your draft becoming a final draft for the

23 client, or at some stage after the final version had

24 gone to the client?

25 A. It's part of the -- part of the raft of the

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1 recommendations in the document. Now, obviously that

2 document, whether it's this draft or the next draft or

3 when it finally gets to a final issue, the onus is on

4 the responsible persons to be able to carry out those

5 works to achieve that standard.

6 Q. A little bit above that sentence in this paragraph --

7 it's hard to read because the word "Draft" is smeared

8 all over it, but if you can see it, it says:

9 "This also casts into doubt the justification on

10 grounds of escape time, the excessive travel distance as

11 outlined in 3.3.6 above."

12 Which we looked at just before the break, Ms Cooney.

13 So it's clear, isn't it, that the fire safety

14 strategy in draft that you are putting forward is

15 reliant very heavily on the smoke ventilation system to

16 maintain tenable conditions in the building for means of

17 escape purposes?

18 A. It is. It is a key component of the fire safety

19 measures in the building, yes.

20 Q. Why didn't you make that clear in paragraph 3.3.6

21 itself, which should say, I suggest, that even though

22 excessive distance was acceptable under current

23 standards, you needed to take account of the

24 unsatisfactory condition of the lobby smoke control

25 system?

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1 A. I think that it is clear in that paragraph, that it

2 needs to be -- it needs to be assessed and, you know,

3 make sure that it does meet a satisfactory level of

4 performance. I don't think that it isn't clear or it

5 isn't strongly enough worded.

6 Q. Right.

7 Can I ask you just to confirm with me: you didn't

8 address anywhere in your report stair width, did you?

9 A. No.

10 Q. Nor doors onto escape routes.

11 A. Doors onto escape routes? The doors onto the escape

12 routes was part of the core ... the consideration of the

13 core materials in the building. So doors -- or whether

14 it's a door or wall, it needs to meet a certain level of

15 resistance, and that's --

16 Q. I don't think you did any investigation, you or anybody

17 else at Exova, into the performance of the existing flat

18 doors, stair doors or lift doors anywhere in the

19 building.

20 A. No, no, that wouldn't be typical for what we were doing.

21 Q. Right.

22 Did you anywhere think to tell the TMO, as the

23 ultimate client, that they needed to undertake

24 an investigation and to what standard?

25 A. We -- again, it is one of the recommendations in the

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1 strategy, in the draft, to check the core, the fire

2 resistance of the core, and that relates also obviously

3 to doors, being part of the building fabric, and the

4 walls and the floors, et cetera.

5 Q. I don't think you addressed anywhere in your report the

6 lighting of escape routes, did you?

7 A. I don't recall it being in the report, no.

8 Q. No.

9 Can I just take you slightly into a siding on this

10 one. Can I ask you to look, please, at {CST00000091},

11 which is Mr Stokes' record of his significant findings

12 as part of his 29 December 2010 fire risk assessment.

13 A. Okay.

14 Q. It's got five pages. You see?

15 A. Mm-hm.

16 Q. I think this is a document you didn't read at the time,

17 as you have confirmed earlier.

18 A. I've never seen this document, no.

19 Q. No.

20 Can I ask you to go to page 5 {CST00000091/5}

21 please, and look at 23e on that page.

22 You can see here that Mr Stokes has given this high

23 priority, hence the red colour in the column, and it

24 identifies the risk under 23e:

25 "It is not known if the monthly occupiers checks are

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1 being carried out on the building's emergency lighting
 2 system, final exit doors etc as per the caretakers
 3 check list ."
 4 Then you see the actions to be taken:
 5 "It should be confirmed with the caretakers if they
 6 are carrying out all the monthly occupiers inspections
 7 and other checks as per the caretakers check list ."
 8 Do you see that?
 9 A. Okay, yeah.
 10 Q. If you also look at the FRA, if we can just go to that,
 11 there is a reference to emergency lighting in that.
 12 That's {TMO10037743/17}. If you look at item 15,
 13 "Emergency escape lighting", he's ticked, "Yes", "Yes",
 14 "Yes", "Yes", under each of those items. Do you see
 15 that?
 16 A. Mm-hm.
 17 Q. Unless you had read that part of the FRA alongside the
 18 record of significant findings, you wouldn't have known,
 19 would you, that the emergency lighting wasn't being
 20 maintained monthly?
 21 A. No, I wouldn't know whether the checks were being
 22 undertaken, no.
 23 Q. And it would have been helpful to know that in order to
 24 advise the TMO, wouldn't it, under your strategy?
 25 A. Whether it's being checked or not is a management type

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1 of provision, so the -- that the managing team should
 2 carry out these checks in terms of the design of the
 3 building, and the expectation would be that it met
 4 a certain design criteria, which is noted here on --
 5 under "Comments or observations".
 6 Q. Lighting of escape routes is one of those things that
 7 there is guidance in respect of under B1, isn't there?
 8 A. Yes.
 9 Q. Yes. Similarly, exit signs?
 10 A. For -- yes, exit signs is under there, yes.
 11 Q. Evacuation lifts?
 12 A. Evacuation lifts aren't a required feature for
 13 buildings.
 14 Q. Right. Yet you haven't, I think, covered in your report
 15 either lighting of escape routes or exit signs.
 16 A. I don't recall it being in there, no, it's not.
 17 Q. Right. And why is that?
 18 A. I don't know, if I'm perfectly frank. It's, again,
 19 an area of the report which needs further information
 20 into it, as a draft. But certainly it was -- it would
 21 be a key component of B1.
 22 Q. Now, can I just ask you, then, about section 5, moving
 23 on to that, please, in your report. If you go back to
 24 that, {TMO10001925/13}, and look, please, at
 25 paragraph 5.1.3. I just want to ask you about

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1 firestopping, if you go to that. 5.1.3, "Fire Stopping
 2 Within Concealed Spaces"; do you see that?
 3 A. Yes.
 4 Q. You say in the first sentence under this heading, in the
 5 second paragraph -- well, before I go to that, actually,
 6 there is a quotation:
 7 "The building shall be designed and constructed so
 8 that unseen spread of fire and smoke within concealed
 9 spaces in its structure and fabric is inhibited."
 10 That's a quotation, isn't it, from B3.(4) --
 11 A. Yes.
 12 Q. -- in fact. Then you say:
 13 "There are limits to the extent to which any
 14 cavities can exist, for example between walls and
 15 cladding and between ceilings and roofs. Fire stopping
 16 via appropriate cavity barriers are assumed to be in
 17 place."
 18 Do you see that?
 19 A. Yes.
 20 Q. Did you understand that there was a difference between
 21 cavity barriers and firestops?
 22 A. Yes. Yes, there is a difference.
 23 Q. What was that difference?
 24 A. So ostensibly it's the difference between a fire
 25 resisting element and a compartment line, a compartment

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1 being a more robust element of fire resistance.
 2 Q. Yes. I see.
 3 Would you say that you went about firestopping with
 4 a cavity barrier?
 5 A. It really depends on the location of what it is that is
 6 being stopped or a barrier, a cavity barrier. You know,
 7 the different areas need different -- it might need
 8 a firestopper, it might need a cavity barrier. When we
 9 refer to firestopping, it's not necessarily meaning
 10 firestopping on a compartment line; it means a material
 11 which is preventing the spread of fire between --
 12 through an element, which may only be a cavity barrier
 13 or a fire resisting wall for means of escape purposes or
 14 an element of structure. There's various uses of the
 15 words, really.
 16 Q. Let's see if we can make this shorter.
 17 Go to {CLG00000173/144}. This is ADB, and these are
 18 the definitions used in ADB, appendix E, page 144, and
 19 look with me, please, at the definition of "fire stop",
 20 which is on the right-hand side, second from the end.
 21 You see that? It's:
 22 "A seal provided to close an imperfection of fit or
 23 design tolerance between elements or components, to
 24 restrict the passage of fire and smoke."
 25 Do you see that?

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1 A. Okay.
 2 Q. Did you understand that that was the definition of
 3 firestop at the time?
 4 A. Yes.
 5 Q. Then if you go back to page 143 {CLG00000172/143},
 6 please, we see the definition of "cavity barrier". I've
 7 done it in this order deliberately. At the bottom of
 8 that page on the left-hand side:
 9 "Cavity barrier. A construction, other than a smoke
 10 curtain, provided to close a concealed space against
 11 penetration of smoke or flame, or provided to restrict
 12 the movement of smoke or flame within such a space."
 13 Given those are two clear and distinct -- well,
 14 I should ask you: are those two clear and distinct
 15 definitions of two different things?
 16 A. They ... they are, but without wanting to be ... you can
 17 have a penetration through a cavity barrier,
 18 for example, above a fire resisting doorset, which then
 19 needs to be firestopped with a firestopping product.
 20 Q. Yes.
 21 A. So whilst they are two distinct definitions, we can use
 22 the word "firestop" for a generic manner of sealing
 23 penetrations through fire resisting elements.
 24 Q. I wonder if you could just go back to page 13 of your
 25 report in section 5.1.3, {TMO10001925/13}. When you say

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1 "fire stopping via appropriate cavity barriers", aren't
 2 you mixing up terminology dealing with the separate
 3 aspects of Approved Document B?
 4 A. It could be clearer. I would admit it could be clearer.
 5 But the context and the general understanding is clear:
 6 there's a hole in a fire resisting element, it needs to
 7 be firestopped.
 8 Q. Let me ask you this: what assumptions were you making
 9 about the familiarity that the reader of your report had
 10 with Approved Document B?
 11 A. I would -- like I've said before, for the reader of this
 12 particular draft, I was expecting this to go through to
 13 the design team, and those in the team undertaking the
 14 next set of documents to be fairly knowledgeable about
 15 fire related matters.
 16 Q. Did you expect the reader of this report, the ultimate
 17 end user as you referred to them earlier, to be more
 18 expert on ADB, as expert on ADB or less expert on ADB
 19 than you?
 20 A. Less, I would assume.
 21 Q. Given that you were expecting them to be less expert on
 22 ADB than you, wouldn't the expression "firestopping via
 23 appropriate cavity barriers" muddle them up and get them
 24 to think that one could firestop with cavity barriers?
 25 (Pause)

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1 A. I suppose it can be read that way. I don't think it's
 2 necessarily a ... like I said, it could be clearer.
 3 Q. Well, unless you knew the difference in definitions, and
 4 perhaps the acceptance of the difference in definitions
 5 which you have identified, you would think, wouldn't
 6 you, that you would firestop with a cavity barrier?
 7 A. If the cavity barrier has -- so cavity barriers, whilst
 8 there is a certain understanding or requirement, the
 9 cavity barrier can have various fire resistances and
 10 various uses. Cavity barriers are prolific throughout
 11 buildings internally and externally, so ... like I say,
 12 yes, it could be clearer, but I don't think the
 13 intention is to necessarily confuse.
 14 Q. Where in the building did you think that appropriate
 15 cavity barriers were in place?
 16 A. So the prime places for cavity barriers are in excessive
 17 voids and to the external façade. The ... over various
 18 internal doorsets and down corridors. They can be
 19 anywhere in a building that requires fire resisting,
 20 really.
 21 There's -- if it needs a cavity barrier to extend
 22 an element of fire resistance, for example a protective
 23 corridor or something along those lines within the
 24 non-residential areas.
 25 Q. On the basis of your familiarity, such as it was, with

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1 this building, where within the building did you think
 2 cavity barriers were in place, according to the
 3 assumption you were making?
 4 A. I didn't know where the cavity barriers were, which is,
 5 you know, I suppose the reason for the recommendation.
 6 But they can be, you know, anywhere in a building. So
 7 it would be anywhere above a suspended ceiling,
 8 for example, or ... again, in external façades or the
 9 lobbies within the accommodation, places such as that.
 10 Q. You go on in the last sentence to say:
 11 "... it is recommended that these elements are
 12 assessed within void flats to a level which would
 13 provide confidence in whether or not the provision is
 14 satisfactory."
 15 By what performance criteria were you telling or
 16 advising the ultimate end user of this report to --
 17 A. Well, within the --
 18 Q. -- measure satisfactoriness?
 19 A. Within the whole firestopping section, what was being
 20 looked for there was basically penetrations and holes
 21 within the fabric between the enclosing walls of the
 22 flats internally and the adjacent spaces or flats.
 23 Q. Yes. By what standard were you advising the reader of
 24 this report to judge whether the provision was
 25 satisfactory or not?

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1 A. It doesn't state it there.
 2 Q. It doesn't?
 3 A. It doesn't, no.
 4 Q. It should have done, shouldn't it?
 5 A. Again, firestopping comes in different periods of fire
 6 resistance, so it could have been clarified there, but
 7 typically it can be throughout the building. So, yes,
 8 it would have been a good place to put that.
 9 Q. Let's move very quickly into external fire spread. Very
 10 quickly. Go, please, to page 14 {TMO10001925/14} of
 11 this report, section 6, and you set out there the
 12 requirement of B4 at the top, and the general philosophy
 13 and the external wall construction. Just to be clear on
 14 that, we have no complaint about that.
 15 My question is: you didn't have anything in there
 16 about the external fire spread requirements in respect
 17 of the roof. We can see that it wasn't there. Why was
 18 that?
 19 A. I don't think we had any information on the roof at that
 20 particular time, but I could have had, again, a holding
 21 spot.
 22 Q. Right. There's no holding spot in respect of it. Does
 23 that mean you didn't consider the roof at all?
 24 A. Erm ... I would have considered the roof. Obviously
 25 there's not a reason for concern on it, so I haven't put

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1 that holding spot in there.
 2 Q. Right.
 3 Just to be clear, although you haven't set out the
 4 basis on which, under 6.2, you said that the external
 5 surface over 18 metres should have a surface
 6 classification of class 0, national, or B, et cetera,
 7 European -- that's ADB, isn't it, clearly?
 8 A. It is, yes.
 9 Q. Diagram 40; yes?
 10 A. Yes.
 11 Q. The question is: why didn't you just set out that it was
 12 diagram 40 so that the reader would know that it was
 13 anchored in the regulation?
 14 A. It wasn't common practice to replicate all these parts
 15 of Approved Document B and import various diagrams into
 16 a draft report, really.
 17 Q. Can I take you to section 7, B5, "Access and Facilities
 18 for the Fire Service", page 15 {TMO10001925/15}. I just
 19 want to look at two short provisions, 7.1 and 7.3.
 20 Under 7.1, you say in the second line there should
 21 be a dry rising main within the firefighting shaft. Do
 22 you see that?
 23 A. Yes.
 24 Q. To be fair to you, I think your point here is that the
 25 outlet should be in the stair and not in the lobby, but

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1 that's an existing condition; is that right?
 2 A. Yes, that's correct.
 3 Q. I will come back to that in a minute, but I just want to
 4 focus on your advice that it should be a dry rising
 5 main.
 6 Looking at 7.3, if you look there, you say that the
 7 current guidance -- do you see, in that paragraph four
 8 lines up from the bottom -- should be for a wet rising
 9 main because the building is over 50 metres in height;
 10 yes?
 11 A. Yes.
 12 Q. Was this not contradictory advice, dry rising in 7.1 and
 13 wet rising in 7.3?
 14 A. I don't think so, no. I think the -- so section 20 of
 15 the London Act asked for a main and it would have needed
 16 a wet riser. For whatever reason, we have a dry riser
 17 in the existing building. So in terms of the existing
 18 provision, it is satisfactory, based on having a single
 19 fire scenario, a flat on fire. Given the heavy level of
 20 construction fabric and compartmentation, I didn't think
 21 that the dry riser would be a significant reduction in
 22 standard over the wet for this type of a building, given
 23 that there was no works being carried out on those
 24 levels, as I understood it at the time.
 25 Q. Right. Let me just try that one again.

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1 You say there should be a dry rising main, and then
 2 you say there should be a wet rising main. Which is it?
 3 A. The current guidance would say that there is a wet
 4 rising main, but we have a dry rising main, and I go on
 5 to say that, given the provisions in the building, that
 6 should be satisfactory.
 7 Q. You say in the sentence beforehand in 7.3:
 8 "The fire risk assessment describes the provision of
 9 a fire fighting shaft and fire fighting/evacuation lifts
 10 with dry rising main."
 11 You see that?
 12 A. Yes.
 13 Q. If you go to 7.1, you say the building should be
 14 provided with a firefighting shaft, and then you say one
 15 is provided. Do you see that?
 16 A. Sorry, 7.1?
 17 Q. Yes, 7.1 at the very top of the page.
 18 A. Yes.
 19 Q. You say:
 20 "... one is provided (as stated in the current fire
 21 risk assessment)."
 22 Was that a reference to Carl Stokes' 29 December
 23 FRA?
 24 A. Yes.
 25 Q. We have looked at the then current fire risk assessment

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1 from 29 December 2010. We can't find any reference to
 2 the tower being provided with a firefighting shaft.
 3 I'm not going to sit here and comb through it with
 4 you, there isn't time, but do you remember taking any
 5 steps to verify that the fire risk assessment did
 6 actually say what you say it says?
 7 A. Having a two-hour stair, dry rising main, fire
 8 evacuation lift, they are the key component parts of
 9 a firefighting shaft.
 10 Q. Right.
 11 Did you take any steps to check that it was correct
 12 with regard to the provision of a firefighting shaft?
 13 A. I'm sorry, I don't understand the question.
 14 Q. Did you check the fire risk assessment to --
 15 A. Sorry, the fire risk assessment noted these component
 16 parts, which are integral to a firefighting shaft. So
 17 together they would form the shaft itself.
 18 So with a residential building, which I hope we can
 19 come back on to later to pick up another point from
 20 before, but the constituent parts of a firefighting
 21 shaft are the stairs, the lift and the lobby approach
 22 and the firefighting main, whether that be wet or dry.
 23 Q. What you are summarising just now is the essence of what
 24 diagram 52 I think shows.
 25 A. It is a firefighting shaft, yes.

1 Q. Now, you say in 7.1 that the fire main outlet should be
 2 sited in the stair.
 3 A. Yes.
 4 Q. You don't refer to diagram 52, but we looked at that.
 5 We know that the fire main outlets are in the
 6 lobbies and that's an existing position, we've just been
 7 through that.
 8 Why did you not include any discussion or assessment
 9 within your draft report about the impact on the
 10 operation of firefighting of the fact that the fire main
 11 outlets were in the lobbies and not in the stair, as
 12 required by diagram 52?
 13 A. The outlets being in the lobby -- and I'm fairly sure on
 14 this -- were a requirement of section 20 at the time.
 15 Terry is probably your man to clarify that for you. But
 16 the section 20 Act asks for it to be in the protected
 17 lobby, rather than in the stair, so that's probably why
 18 it was originally constructed in that manner. As
 19 an existing condition of a provision that was put in
 20 specifically under firefighting legislation, it was
 21 considered to be satisfactory.
 22 Q. Yes, that wasn't my question. My question wasn't about
 23 compliance, my question was about the absence of any
 24 discussion or assessment in your report about the impact
 25 of the fire main outlet being in the lobby as opposed to

1 the stair and its potential impact on firefighting
 2 operations. You don't mention anything in your report
 3 about that, and my question is: why didn't you do that?
 4 A. We didn't do an assessment on it in terms of outlining
 5 how we came to that conclusion, but that process has
 6 been gone through and come to the conclusion we
 7 didn't -- I suppose I didn't feel it necessary to put it
 8 in if I'm ultimately going to say it was satisfactory.
 9 Q. Because the ultimate reader of this report wouldn't know
 10 that having the fire main outlets in the lobbies as
 11 opposed to in the stair -- as required by Approved
 12 Document B, diagram 52 -- would have an impact on
 13 firefighting operations.
 14 A. But then we are trying to push an existing building and
 15 its fire safety provisions into a current guidance
 16 document which is somewhat of a gap analysis, as we were
 17 discussing before, and that's not always necessary. So
 18 it doesn't make it unsafe; it's an existing provision
 19 under what was still then current legislative guidance,
 20 I guess.
 21 Q. Right.
 22 Firefighting lift. You deal at paragraph 7.3 on
 23 page 15 in the fourth line with that, and you say:
 24 "The fire risk assessment describes the provision of
 25 a fire fighting shaft and fire fighting/evacuation lifts

1 with dry rising main."
 2 We looked at that before. You see that?
 3 A. Mm-hm.
 4 Q. Can I ask you to look at Mr Stokes' December 2010 fire
 5 risk assessment, {TMO10037743/4}. Just to remind you,
 6 you got this on 13 August 2012. This is at the bottom
 7 of that page, and it says, do you see, in the bottom box
 8 under "Use and Layout of the Building", four lines up:
 9 "The entrance lobby has two lifts which service all
 10 the floor levels, both are evacuation/fire-fighting
 11 lifts so can be used for disabled evacuation if needed."
 12 You see that?
 13 A. Yes.
 14 Q. Then it goes on:
 15 "Please see the attached plan ..."
 16 A. Mm-hm.
 17 Q. "... showing the layout ..."
 18 A. Okay.
 19 Q. A little bit higher up the page, three-quarters of the
 20 way through the big box, just before the last paragraph
 21 break, Mr Stokes says:
 22 "The two lifts in the building are both fire
 23 fighter/evacuation lifts, both of the lifts serve each
 24 floor level and run the height of the building."
 25 You see that?

1 A. Yes.
 2 Q. You recall I showed you this earlier, you had asked
 3 Bruce Sounes on 9 August whether the lifts were
 4 firefighting lifts, hadn't you?
 5 A. I had, yes.
 6 Q. And he had responded to you on 10 August saying, "No
 7 firefighting lift", do you remember that?
 8 A. I do.
 9 Q. We looked at it this morning. Then you wrote back to
 10 him the same day saying, "Thanks, Bruce. That all makes
 11 sense within the context of the existing building", do
 12 you remember I showed you that?
 13 A. Yes.
 14 Q. We can look at it again if you like, but you remember
 15 that?
 16 A. Yes.
 17 Q. My question is this: once you saw the December 2010 fire
 18 risk assessment on 13 August, a few days after you had
 19 responded to Mr Sounes, did you notice that it
 20 contradicted what Mr Sounes had told you a few days
 21 before in this respect?
 22 A. Yes, I did notice a contradiction at that time.
 23 Q. Did you go back to Mr Sounes and ask him why he had said
 24 that there was no firefighting lift when in fact the FRA
 25 said there was?

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1 A. I don't recall whether I did.
 2 Q. We don't have a record of you doing so and you don't
 3 cover it in your statement, and I don't think he covers
 4 it in his statement, so --
 5 A. I don't recall doing so. But, as a fire professional,
 6 I suppose I took a judgement on the fact that Mr Stokes'
 7 fire risk assessment is littered with this information,
 8 and it being, you know, a regulatory document, the lifts
 9 are clearly noted throughout the document.
 10 So given the difficulty that I had had getting
 11 information out of Studio E, because they didn't seem to
 12 have very much on the existing building, this was a more
 13 reliable source.
 14 Q. Well, you say it was a more reliable source; you had
 15 actually asked Mr Sounes the question, he had given you
 16 a clear answer, so there was no conflict, as far as
 17 you could see, between what Mr Sounes had told you and
 18 what the FRA had said.
 19 So my question is: why didn't you simply send him
 20 an email or pick up the phone to him and ask him, "Well,
 21 I have the FRA, it says there are these firefighting
 22 lifts, why do you say there weren't?" and resolve the
 23 conflict in some way?
 24 A. I don't have an answer to that. I don't know whether
 25 I did discuss that with him or I didn't. I just simply

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1 can't recall whether I did.
 2 Q. Can I suggest an answer -- and please tell me if this is
 3 wrong -- that you were very short of time?
 4 A. Well, we were short of time, yes, in terms of the
 5 deadline which Studio E wanted the draft document for,
 6 but I don't think that's necessarily why I didn't.
 7 I genuinely can't recall whether I did or I didn't.
 8 Q. Did you think to sort the issue out with anyone from the
 9 TMO?
 10 A. No, I don't recall having any contact with the TMO.
 11 Q. Did you know that, as it turns out, the lifts were not
 12 firefighting lifts?
 13 A. I learnt that post-fire, yes.
 14 Q. So opting not to sort out the issue but opting instead
 15 to simply go on what Mr Stokes has said do you accept
 16 turns out to be a serious error in your work?
 17 A. I think that the reliance on the fire risk assessment,
 18 which, like I say, is a regulatory document, is
 19 a reasonable thing to do in this set of circumstances,
 20 and given that it was, you know, the -- it was a draft
 21 document, that is there to be challenged by the design
 22 team. So whilst it transpired not to be the case, that
 23 was the information I was given and was reliant upon at
 24 that time.
 25 Q. Well, you had had two conflicting sources of

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1 information: your instructing architect and the FRA. So
 2 why was the FRA any the more reliable than your
 3 instructing architect?
 4 A. Well, you would assume -- the Regulatory Reform Order
 5 requires a suitable and sufficient fire risk assessment,
 6 and the presence of firefighting lifts and, indeed, he
 7 says evacuation lifts is throughout the document.
 8 Q. Right.
 9 Now, on page 16 {TMO10001925/16} of your draft
 10 report, you have set out your conclusions and
 11 recommendations.
 12 A. Yes.
 13 Q. You have identified three items that you say have
 14 significant consequences in the event of a fire for the
 15 means of escape and potential for breaches in
 16 compartmentation. You don't identify who is responsible
 17 for investigating those matters. Why is that?
 18 A. From a point of view of this document, it would be going
 19 back to the design team, so these items would be picked
 20 up by the design team and investigated.
 21 Q. By the design team, you mean Studio E, do you?
 22 A. And the larger team, yes.
 23 Q. So who is the larger team?
 24 A. So in terms of the mechanical elements, it would be the
 25 people who were looking at the ventilation, et cetera,

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1 et cetera.
 2 Q. Right.
 3 You don't identify a timeframe within which the
 4 investigations you have identified should be carried
 5 out. Why was that?
 6 A. Again, it's a draft document, so it's really for -- this
 7 document is a draft for discussion, if you will. So --
 8 Q. I see.
 9 A. -- we rely on feedback to be able to move the document
 10 forward.
 11 Q. I see.
 12 How long would it normally have taken you to prepare
 13 a final draft, client-ready, for a fire strategy for
 14 an existing building such as Grenfell Tower?
 15 A. A number of weeks. Solidly for a good number of weeks,
 16 I would have thought, if it was to meet all the
 17 requirements.
 18 Q. Right.
 19 Just to be clear, how long would it take you
 20 normally to prepare a first draft?
 21 A. Again, it's dependent on the amount of information we
 22 have.
 23 Q. Right. Okay. Can I ask you --
 24 A. Up to a week, I suppose.
 25 Q. I'm sorry, I cut across your answer.

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1 A. Anything up to a week, a few days to a week, depending
 2 on the information we have.
 3 Q. Can I ask you to be shown, please, the native version of
 4 {EX000001353}. This, Ms Cooney, is a spreadsheet which
 5 has been disclosed by Exova showing the time you spent
 6 on this report. So just look at it with me.
 7 I don't know if you have ever seen this document
 8 before. Would it be familiar to you?
 9 A. I understand it, but I don't think I've seen it.
 10 Q. If you look at it, under rows 49 to 52 -- I'm afraid you
 11 will have to go to this, timesheets, and then look at 49
 12 to 52.
 13 Now, you can see at 49 to 52, this is "Fire strategy
 14 for existing condition", "Cate Cooney", and if you look
 15 at column E, row 49, 9 August 2012, "Plans appraisal",
 16 and then we have further dates, 10 August, 13 August,
 17 15 August.
 18 A. Okay.
 19 Q. It went out to Dr Barker on 15 August, and therefore am
 20 I right in thinking that all the times between the 9th
 21 and the 15th were spent working on this draft?
 22 A. Yes, yes, yes.
 23 Q. So adding up those hours, we get 2, 6, 1, and 6, which
 24 by even my maths I think I get to 15.
 25 A. Mm-hm.

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1 Q. So can we take it from this document that you spent
 2 15 hours working on and producing this draft that you
 3 sent to Dr Barker?
 4 (Pause)
 5 A. Yes, from that timesheet, which I may have spent more
 6 time on than that, but yes. That's what I've booked
 7 down to it.
 8 Q. Would that be a normal period of time to spend on
 9 a document like this?
 10 A. For a draft, it's essentially the best part of
 11 three days, so, yes. It's a ... for a first draft of
 12 this kind of ... with this kind of information, where
 13 there's a lot of caveats, I think -- it's not unusual,
 14 I don't think.
 15 Q. Earlier on in answer to an earlier question I asked you,
 16 how long it would take to prepare a first draft, you
 17 said it would depend on the amount of information, you
 18 would say anything up to a week, depending on the amount
 19 of information. 15 hours isn't anything like a week, is
 20 it?
 21 A. It's half a week, really, in terms of the way that we
 22 booked time, which was based on a ... essentially,
 23 you know, if you worked all day on it, you would
 24 typically book six hours down to it.
 25 Q. To be blunt about it, it's not very long, is it?

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1 A. Well, it's quite an intensive piece of work, you know,
 2 you are working at it all day long. It's really
 3 a matter of gathering all the evidence which isn't --
 4 I don't think it's really accurately reflected in those
 5 hourly figures, and, again, knowing what I -- you know,
 6 what I know in terms of producing works to a standard
 7 that we can call it a draft, we might work more hours
 8 than that, but log less, depending on fees and other
 9 things going on at the time. So whilst it's a good
 10 indicator, it's not necessarily 100% of the time that
 11 you have spent.
 12 Q. Can I ask you to look at {EX000000302}, which is
 13 an invoice of 27 September 2012. This is sent to the
 14 TMO, and you can see that it's dated 27 September. What
 15 is billed here is a fixed lump sum fee for £2,865,
 16 that's the quote we saw in the fee proposal. Cumulative
 17 to date was £2,111.50. Do you see that?
 18 A. Yes.
 19 Q. That meant that something like £753-odd remained to be
 20 invoiced from the lump sum fee quoted in the fee
 21 proposal.
 22 Why did Exova invoice less than originally quoted?
 23 A. I don't know. I wouldn't have been responsible for
 24 instructing the invoice.
 25 Q. Given that the report had not progressed at this point

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1 beyond the draft stage, would it be normal for Exova to
 2 invoice at that point?
 3 A. Yes, the typical invoicing period was at the end of each
 4 month.
 5 Q. Right.
 6 Given that this was a draft, was the balance of the
 7 fee to be invoiced once the draft was turned into
 8 a final document and sent to the client?
 9 A. Not necessarily, no. It depends. Some jobs you would
 10 use a fee quite quickly. Other jobs, there would be
 11 lots of fee there. It's really a matter of managing
 12 your workload. It's not necessarily an absolutely,
 13 you know, to the quarter of an hour logging system.
 14 There is an awful lot of work that doesn't actually ...
 15 it's a lump sum fee, so you do the work regardless of
 16 what the fee is.
 17 Q. Would the fact that only £753-odd remained outstanding
 18 to be done indicate that the vast majority of the work
 19 had been done?
 20 A. I think that the majority of setting out the report had
 21 been done, but there was obviously more information to
 22 follow.
 23 Q. Yes. Okay.
 24 I would like to turn next, please, to the review
 25 done by Dr Barker.

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1 A couple of preliminary questions. I think these
 2 are really yes or no answers, as far as you can recall.
 3 Was Exova at the time certified under ISO 9001?
 4 A. I don't know.
 5 Q. At paragraph 3.8 of your witness statement, if we could
 6 please go back to that at page 3 {EXO00001590/3}, you
 7 say:
 8 "The peer review process at Exova is part of the
 9 document quality control, and typically involves someone
 10 of equal or greater [seniority] to the drafter reviewing
 11 the report to ensure that there are no clear errors and
 12 that it is sound in its basis."
 13 It was Clare Barker, I think, who reviewed your
 14 report, didn't she, Dr Barker?
 15 A. Yes.
 16 Q. If we look at what she said, it's {EXO00000175}, this
 17 should be a pair of emails, one from you to her and one
 18 from her to you, yours on 15 August, second email down,
 19 15.37, to Dr Barker:
 20 "Clare
 21 "Please can you review the existing FSS for the
 22 above. I have printed out drawings if these help (they
 23 probably will!)"
 24 She responds at 15.22, just under exactly 24 hours
 25 later, on the next day, 16 August:

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1 "Have reviewed it and it is fine."
 2 Do you see that?
 3 A. Mm-hm.
 4 Q. Did you and she have any actual discussion about your
 5 draft or was her statement that it was "fine" the extent
 6 of any discussion between you at the time?
 7 A. It's very probable, although I don't recall any
 8 specifics of any conversation, but it is probable she's
 9 asked questions about it.
 10 Q. Her comment, "Have reviewed it and it is fine", was it
 11 usual for you to receive so little detail from a peer
 12 review of such a report?
 13 A. It depends on the job and what it entails, really. It
 14 wasn't unheard of not to have any substantive comments
 15 back for -- you know, that's why I'm saying it's
 16 probable we discussed it between us. So, yes, I mean,
 17 sometimes they came back with comments and sometimes
 18 they didn't, it depended.
 19 Q. Would you usually expect some kind of feedback as part
 20 of the peer review process?
 21 A. Yes, if there are questions that have been raised,
 22 then -- and they're not straightforward or you need to
 23 put some more information to them to put it in context,
 24 then a peer review will ask you questions, and if they
 25 don't need to then they won't. It really is dependent

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1 on the job.
 2 Q. Normally, how long would a peer review on average take
 3 before coming back to you with a peer review report on
 4 your work?
 5 A. Again, it's down to workload, but if you're reading
 6 through it, it may take a couple of hours or so to
 7 review a report. The report was quite short, so I would
 8 have thought that Clare would have read it fairly
 9 quickly, maybe an hour or so. I don't know, you would
 10 have to ask Clare.
 11 Q. I see. So you don't know how long she spent reviewing
 12 your draft during the 24 hours that elapsed between you
 13 sending it to her --
 14 A. No, no, no, I don't.
 15 Q. Did you send her any other documentation that you had
 16 reviewed in order to prepare your draft, other than the
 17 report you sent her?
 18 A. And the drawings.
 19 Q. And the drawings.
 20 A. I think Clare had obviously the same amount of
 21 information I had from the beginning, so she may well
 22 have referred to those.
 23 Q. Did you send her the Stokes FRA and the email
 24 correspondence that you had had with Mr Sounes?
 25 A. I don't think I would have sent those documents.

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1 I would have had them printed out somewhere, and
 2 probably just put them on her desk.
 3 Q. Put them on whose desk?
 4 A. On Clare’s desk. So that was fairly typical.
 5 Q. Did you alert her to the need to read them or did you
 6 not?
 7 A. I can’t recall. Again, it may have been a conversation
 8 we had.
 9 Q. Okay.
 10 You then say in your statement at paragraph 3.10
 11 {EX000001590/3}:
 12 "After the peer review, reports are then sent to our
 13 administration team to produce in final form (although
 14 still marked draft until approved by the regulator or
 15 the client) before being circulated."
 16 This was clearly intended to be sent to Studio E as
 17 a draft, wasn't it?
 18 A. Yes. Yes.
 19 Q. Was it ever sent to Studio E, or the TMO, for approval?
 20 A. Yes, I sent it through to Studio E via email.
 21 Q. You sent it to Studio E?
 22 A. Mm-hm.
 23 Q. Would you then have followed up to make sure that
 24 a final version was sent to the client?
 25 A. For this particular project, because I was undertaking

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1 the draft strategy on behalf of the London office, then
 2 not necessarily. The project was being managed in
 3 London, so ...
 4 Q. Now, we know from your statement that the version which
 5 we have looked at, the 16 August draft, marked "draft",
 6 was the only version of the existing fire safety
 7 strategy report ever created. Do you know why it was
 8 never finalised?
 9 A. I don't, no.
 10 Q. Was it usual for drafts not to be finalised?
 11 A. Erm ... no, not to this extent, no. No. Typically we
 12 would get some detail back from the design team and it
 13 would be updated.
 14 Q. Did you never discuss the assumptions and unknowns in it
 15 so that a final draft could be produced?
 16 A. With Studio E or with --
 17 Q. Well, at all.
 18 A. I discussed the assumptions, I must have discussed the
 19 assumptions with Clare, because I don't recall that in
 20 the timeframe, but I do know that Studio E did come back
 21 with some comments on it, so I don't know whether they
 22 were ever then followed through to produce another
 23 document. I was never requested to produce any further
 24 documentation on --
 25 Q. Let's just chase this through. Could you please be

202

1 shown {EX000001396}. This is your email sending
 2 draft 1, which is this draft, through to Mr Sounes on
 3 16 August.
 4 A. Okay.
 5 Q. Do you see you say:
 6 "Bruce
 7 "Please find attached the draft 1 of the existing
 8 fire strategy for the Tower. I will be finishing to go
 9 on holiday on Friday. Please feel free to ring and
 10 discuss any of the content before then."
 11 Now, 16 August was a Thursday, I've checked, so
 12 in fact you were going on holiday the very next day,
 13 weren't you?
 14 A. Okay. Yes.
 15 Q. Well, do you remember that?
 16 A. I don't remember the specific dates I went on holiday.
 17 Q. Okay. So you gave him at best 24 hours to review it and
 18 discuss it with you, didn't you?
 19 A. Well, to discuss it with me personally, yes, but he
 20 obviously --
 21 Q. Indeed.
 22 A. -- would have discussed it with others.
 23 Q. Can we go forward then in time, and a different
 24 document, {SEA00000048}. This is an email from
 25 Mr Sounes to Mr Ashton at Exova, copied to Clare Barker

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1 and Paul Dunkerton:
 2 "Terry, we have a meeting planned for the
 3 afternoon ..."
 4 Do you see that?
 5 A. Yes.
 6 Q. "... of the 6th, which is the date Cate returns (bounce
 7 back below)."
 8 You can see the bounce-back at the bottom of the
 9 page:
 10 "I am currently on annual leave and will not return
 11 until Thursday 6th September 2012."
 12 A. Okay.
 13 Q. Then he says this:
 14 "She did offer to have someone come back with a
 15 markup of the plans forwarded 16/08 but we haven't
 16 received one yet. These have been developed as part of
 17 the preparations for the Planning Submission ...
 18 "We need to go through the fire strategy (existing -
 19 Draft) received 16/08 which has numerous
 20 recommendations, some of which may be unrealistic for an
 21 interim strategy. It is probably also a good time to
 22 make contact with the local fire officer to discuss the
 23 project."
 24 Do you see that?
 25 A. Yes.

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1 Q. When did you offer Mr Sounes someone to come back with
 2 a mark-up of the plans?
 3 A. I think the mark-up of the plans is relating to the
 4 layouts of the lower floors we looked at before.
 5 Q. Do you recall a discussion with Mr Sounes about that
 6 topic on the Friday morning of 17 August before you went
 7 on holiday?
 8 A. I don't recall the conversation, no.
 9 Q. Do you know if there was ever a going through of the
 10 fire strategy?
 11 A. I don't.
 12 Q. Was it ever followed up with you?
 13 A. No, it went back to -- obviously to others.
 14 Q. Were you ever asked to discuss your recommendations,
 15 assumptions or other things you had left outstanding
 16 with anybody?
 17 A. No. No.
 18 Q. Did it not occur to you to find out from Dr Barker or
 19 Mr Sounes why that was and chase it up --
 20 A. Erm --
 21 Q. -- after you had got back from holiday?
 22 A. No, because it was handed back to colleagues who were
 23 dealing with the project overall.
 24 Q. Did Mr Ashton ever tell you or invite you to comment on
 25 the idea that a detailed interrogation of the draft

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1 fire strategy was required once you had got back from
 2 holiday?
 3 A. No, no, I don't recall Terry --
 4 Q. Do you know if Exova ever made any efforts to understand
 5 the draft strategy that you had provided in any detail?
 6 A. Sorry, could you repeat that, please?
 7 Q. Yes. Did anybody ever ask you -- I'll try it
 8 differently -- to help Exova understand the existing
 9 situation and the draft fire strategy that you had
 10 produced?
 11 A. After I sent the email to Bruce and once I had commented
 12 on the proposals, I didn't have any further involvement
 13 with the project, so no.
 14 Q. Do you remember having a discussion with Mr Sounes on
 15 the morning of 17 August?
 16 A. I don't.
 17 Q. You don't?
 18 A. I don't.
 19 Q. I'm going to go back to an email we looked at earlier
 20 today, the email of 17 August 2012, at {EXO00001279}.
 21 This is your email to Andrew Martyn. Do you remember we
 22 looked at this before?
 23 A. I do.
 24 Q. It's the one with the colourful language in.
 25 A. Yes.

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1 Q. I'm not going to read it all out to you, but I take it
 2 you're familiar with it?
 3 A. I am.
 4 Q. What was your purpose in sending this email?
 5 A. The purpose was to basically advise Andy that if
 6 somebody was to ring in relation to the project, kind of
 7 an outline of what it was about, really, but as far as
 8 I know Bruce never called and Andy didn't reply to it.
 9 So it's just an internal email to a colleague.
 10 Yes, it has colourful language, but it was never
 11 intended for anybody but Andy, really.
 12 Q. I understand that.
 13 You say:
 14 "They are now adding additional levels which merges
 15 uses around a single stair. Not great."
 16 Do you see that?
 17 A. Yes.
 18 Q. Did you explain your view about that to Mr Sounes when
 19 you spoke to him?
 20 A. This email, as I stated before, doesn't -- so this is in
 21 relation to the refurbishment at an early design
 22 proposal, so I didn't speak to Bruce about the mark-ups
 23 at all, because I sent those through to Terry. I don't
 24 think I -- I can't recall speaking to Bruce, but --
 25 Q. Right. You say:

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1 "Basically I have told him we can massage the
 2 proposal to something acceptable, with separation,
 3 lobbies etc but that there are approval risks to the
 4 project on the ff shaft/MOE [means of escape] front."
 5 Were you suggesting to Mr Sounes that you could do
 6 something to get around the problem posed by
 7 building control being otherwise likely to reject the
 8 smoke ventilation and other proposals for the building?
 9 A. Absolutely categorically not. The --
 10 Q. So what do you mean -- so sorry.
 11 A. So in the use of "massage", which, yes, it's a word --
 12 I could have used several other words, but what
 13 I intended by that is then followed on with separation
 14 lobbies. What it essentially means is design changes
 15 which would improve the layout from a fire safety
 16 perspective. So that's all that was intended by that.
 17 Q. I see.
 18 You go on to say, just jumping ahead, paragraph 5.3
 19 of your statement {EXO00001590/7}, that what you meant
 20 in that sentence was that, with some design changes, the
 21 proposal could be improved to a level where they would
 22 be satisfactory from a Building Regulations perspective.
 23 That's what you meant, is it?
 24 A. Design changes to make it work essentially from
 25 a fire safety design point of view, yes.

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1 Q. That's not what massaging normally means, is it?
 2 A. It has several meanings and, as I've already said, yes,
 3 I could have chose a different word. I didn't --
 4 there's no ... there's no intention to be anything other
 5 than just design changing it, and that is all I meant by
 6 it.
 7 Q. Yes. What I'm really suggesting to you is that the use
 8 of the word "massage" was really a deliberate one,
 9 because what you were seeking to do was really just to
 10 present matters in a different way so as to get it past
 11 building control.
 12 A. Absolutely not.
 13 Q. And not to make any substantive changes to the design.
 14 A. Absolutely not.
 15 Q. You reject that, do you?
 16 A. I absolutely reject it.
 17 Q. I see.
 18 You say in the email, "we can massage the proposal
 19 to something acceptable". Acceptable to whom?
 20 A. Something acceptable in general terms, really. The
 21 proposed design, as I remember it, was -- as I say, it
 22 wasn't great. It took residents out of the single stair
 23 back through the building, which we wouldn't allow to
 24 happen without further measures being in place.
 25 Q. Did you ever discuss your concern about merging of uses

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1 round a single stair with Mr Ashton, do you remember?
 2 A. I think I did, because it was Terry that asked me to
 3 look at that -- that layout, as I recall.
 4 Q. Then you go on to say in the penultimate sentence:
 5 "They are making an existing crap condition worse so
 6 it's a matter of working the worse bits out and making
 7 the new stuff work."
 8 Do you see that?
 9 A. Yes.
 10 Q. What did you mean exactly by "making an existing crap
 11 condition worse"?
 12 A. From my understanding of the original layout, there were
 13 some non-residential areas off the single stair which,
 14 under modern-day guidance, wouldn't be what we would
 15 ideally be looking for. So to in fact negate the risk
 16 from those, we needed to introduce new measures to
 17 improve that situation. So whilst it was an existing
 18 condition, I suppose this is where you kind of try to
 19 improve on an existing condition when relevant works are
 20 being carried out.
 21 Q. In what respects does the proposed refurbishment make
 22 the condition of the building as regards compliance with
 23 the Building Regulations worse?
 24 A. From a point of view that they were adding additional
 25 flats to the building, they were changing the escape

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1 routes for the residents, so it was ... it was a way of
 2 making sure that where, as I said before, the residents
 3 would come out of the single stair and through the
 4 building, to make sure that those new provisions were
 5 making it, you know, less satisfactory.
 6 Q. What were the worse bits or worst bits?
 7 A. I didn't like the non-lobbied approach that they had to
 8 other purpose groups, so ...
 9 Q. Right.
 10 Was this a conversation you had with Mr Sounes? Did
 11 you say to Mr Sounes that he was "making a crap
 12 condition worse", so it's a matter of working the worst
 13 bits out and making the new stuff work?
 14 A. No, this was an internal email to Andy, and at that
 15 particular time there had been nothing concrete that had
 16 gone back to him, as far as I know. I had been asked to
 17 provide some thoughts on a design, and that was just
 18 really to say to Andy that it's not where it needs to
 19 be.
 20 Q. Did you ever communicate to Mr Sounes the gist of your
 21 concern that you expressed colourfully here?
 22 A. No, I didn't speak -- to my recollection, I didn't speak
 23 to Mr Sounes once I had been -- once I went on holiday.
 24 I can't recall --
 25 Q. The only reason I ask you is you say in the first part

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1 of the paragraph, "I have just spoken to Bruce in
 2 relation to the attached".
 3 A. Okay.
 4 Q. So in the just speaking to Bruce, did you tell him words
 5 to the effect of, "They're making an existing crap
 6 condition worse"?
 7 A. I wouldn't have used that terminology --
 8 Q. I know that, but the gist of it.
 9 A. -- with Bruce, but I can't recall the detail of the
 10 conversation with Bruce at all. I don't remember the
 11 conversation in any detail.
 12 If there was -- if there was a likely ... you know,
 13 the way I would have told him is that there are approval
 14 risks and it needs to be -- you know, we need to look at
 15 separations, lobbies, things like that, to try and make
 16 the proposal work. But I don't recall specifics of the
 17 conversation with him.
 18 Q. Right. You say at the end of that paragraph:
 19 "LABC building control Kensington and Chelsea - do
 20 we have any contacts there?"
 21 Did you in fact have any contacts within RBKC's
 22 building control department in relation to this project?
 23 A. I didn't, no.
 24 Q. What was the purpose of asking the question?
 25 A. The purpose of asking the question really is to -- so

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1 it's very normal to engage with building control as soon
 2 as you can to get their opinion and involve them in the
 3 project so that if there is anything that they have
 4 concerns over, we can at that stage incorporate those
 5 into the design, so that once the design reaches
 6 a finalised stage, we're all happy that it achieves what
 7 it needs to achieve.

8 MR MILLETT: Right.

9 Mr Chairman, it's gone 4.30.

10 SIR MARTIN MOORE-BICK: Well, I noticed that.

11 MR MILLETT: I noticed you noticing it. I am pretty much at
 12 the end of my questions for this witness, but I'm
 13 conscious that we need a take a few minutes so that
 14 I can just make sure that I've covered everything and
 15 also to see whether others in the room may have
 16 supplemental questions.

17 Given the exceptional circumstances of today and our
 18 later start, I wonder if I might trespass on your time.

19 SIR MARTIN MOORE-BICK: I'm sure Ms Cooney would like to
 20 finish her evidence this evening.

21 THE WITNESS: I would, yes.

22 SIR MARTIN MOORE-BICK: If we went on for another
 23 ten minutes or so, would that trouble you?

24 THE WITNESS: Absolutely fine.

25 SIR MARTIN MOORE-BICK: Will that be enough, Mr Millett?

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1 MR MILLETT: I'm trusting it will be.

2 SIR MARTIN MOORE-BICK: I'm trusting it will be; you're
 3 telling me it will be.

4 MR MILLETT: Yes, usual way.

5 SIR MARTIN MOORE-BICK: Yes.

6 MR MILLETT: Thank you.

7 (Pause)

8 Can I ask you, please, to be shown {EX000000388}.
 9 This is an email that you sent to Mr Ashton about the
 10 smoke control system at the tower on 10 September, just
 11 after your holiday. Do you see that?

12 A. Okay, yes.

13 Q. You say:

14 "Terry,

15 "As promised, my thoughts on the possible solution
 16 to Grenfell Tower ..."

17 Do you see?

18 A. Okay.

19 Q. Do take some time to have a look at it. You deal with
 20 ground level, mezzanine, walkway level and office level.

21 In the last big paragraph before the bottom, you
 22 say:

23 "The existing ventilation system is questionable and
 24 the overall scheme theoretically makes the existing
 25 conditions worse by adding the additional risk of 2 No

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1 extra residential floors to the building. It is
 2 proposed to upgrade the ventilation system, but the
 3 standard it will achieve is unknown. There are also no
 4 details on the terminal to the shaft.

5 "Generally, there is a significant approvals risk
 6 with the current proposals, particularly at walkway
 7 level."

8 If your task was limited to production of the
 9 existing fire safety strategy report, why were you
 10 sending Mr Ashton this email including your possible
 11 solution to Grenfell Tower?

12 A. So this email was the response, I think, to Terry's
 13 asking me to have a look at those layouts. So it's part
 14 and parcel of that.

15 Q. I see.

16 Then you go on at the bottom, "The existing
 17 ventilation is questionable", as I have shown you. What
 18 did you mean by the existing ventilation system being
 19 questionable?

20 A. Again, that goes back to the existing fire strategy
 21 where we questioned what was actually there, and to make
 22 sure that the overall scheme -- to make sure that it was
 23 up to the job of doing what we expect it to do, which
 24 was to provide adequate ventilation in the event of
 25 a design fire.

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1 Q. Had anybody actually assessed the existing ventilation
 2 system for its design or its maintenance between
 3 producing your draft report and the date of this email?

4 A. I don't know whether any of the work or any of the
 5 recommendations had been done by this point. I didn't
 6 have any involvement with it, unfortunately.

7 Q. Right.

8 Do you agree that, apart from this reference to the
 9 theoretical worsening of the smoke ventilation system,
 10 you made no reference here to the proposed refurbishment
 11 making existing conditions worse?

12 A. No, but in context, that statement was in relation just
 13 to this ... this email, essentially, this proposed
 14 layout from the architects. It doesn't relate in any
 15 other way to the ongoing scheme.

16 Q. Did you ever express your concern that a bad condition
 17 was to be made worse by the proposed refurbishment to
 18 Mr Sounes at Studio E or --

19 A. I don't recall speaking to Bruce following my holiday,
 20 I just don't recall that.

21 Q. Did you relay your concerns to Dr Barker?

22 A. I think Dr Barker was aware of the level of concerns and
 23 the caveats we had put in the report, and obviously that
 24 document was there for others to read as well.

25 Q. Go back, please, to {EX000001607}. This is an email

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1 which I'm not sure we looked at. This is from Mr Sounes
 2 to Mr Ashton of 30 August. Do you see that?
 3 A. Yes.
 4 Q. He says:
 5 "Terry,
 6 "We have a meeting planned for the afternoon of the
 7 6th, which is the date Cate returns ..."
 8 Do you see that?
 9 A. Yes.
 10 Q. "... (bounce back below)."
 11 We looked at this earlier on and I don't think
 12 I looked at the last paragraph with you:
 13 "We need to go through the fire strategy (existing -
 14 Draft) received 16/08 which has numerous
 15 recommendations ..."
 16 In the last sentence, Mr Sounes said:
 17 "It is probably also a good time to make contact
 18 with the local fire officer to discuss the project."
 19 Were you ever asked by Mr Sounes or Mr Ashton to
 20 make contact with the local fire officer or did you
 21 receive any information about that kind of contact?
 22 A. No.
 23 Q. Were you ever asked to discuss your recommendations
 24 further after you had come back from holiday?
 25 A. No.

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1 Q. Did you or anyone else from Exova engage with the local
 2 fire officer?
 3 A. I don't know. I assume so.
 4 Q. Okay.
 5 A. Just simply because it was an ongoing project. But
 6 I don't know.
 7 Q. Did you ever take any steps to ensure that matters for
 8 further investigation were considered and addressed by
 9 the TMO? I may have asked you that before, but just to
 10 confirm it for me, please.
 11 A. No. From here, it went on to others in the team.
 12 Q. Yes, I see, okay.
 13 Finally, can I ask you, please, to go back to
 14 paragraph 3.5 of your statement, page 2 {EX000001590/2}.
 15 This is the paragraph which refers to the baseline. Do
 16 you remember we discussed that earlier this morning,
 17 Ms Cooney?
 18 A. Yes.
 19 Q. Was there any process whereby you took Terry Ashton
 20 through your report or draft and discussed it in detail
 21 so that he could use it as his baseline for his work on
 22 the refurbishment fire safety strategy?
 23 A. There wasn't any process as such. I don't recall ever
 24 having done that. I don't recall Terry asking me to go
 25 through that with him. Obviously the document was there

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1 for him to read, so ...
 2 Q. Right.
 3 Did you take any steps -- and I think the answer
 4 from the last question is no, but correct me if I'm
 5 wrong -- to ensure that the team responsible for putting
 6 together the fire safety strategy for the refurbishment
 7 works understood your proposals, concerns, assumptions,
 8 et cetera, in the existing fire safety strategy?
 9 A. No. No, I --
 10 Q. Is there a reason why you didn't?
 11 A. I suppose if there was any ambiguity or any ... anything
 12 that they wanted to question, I was there to -- on the
 13 end of the phone to call. So I don't know. It's
 14 a fairly straightforward strategy, with straightforward
 15 recommendations, so I wouldn't necessarily expect it.
 16 But no, I didn't. I didn't follow it up with Terry, and
 17 I don't recall Terry asking any particular questions.
 18 Q. All right. Thank you very much.
 19 One more question on a completely different topic.
 20 Are you aware of Exova ever having carried out
 21 a desktop study considering the compliance with
 22 BR 135 -- and I'm assuming you know what that is --
 23 A. Yes.
 24 Q. -- of a rainscreen cladding façade for a high-rise
 25 building using Celotex insulation?

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1 A. No, that's a completely separate part of the business.
 2 Q. It's a separate part of the business, is it?
 3 A. Yes.
 4 Q. Okay. Can you just help me, which part of the business
 5 is it?
 6 A. So in terms of assessments, it would be -- I don't know
 7 the name of the -- but I think it would fall under the
 8 certification business, but you would --
 9 Q. I see, okay.
 10 A. -- have to check on that.
 11 MR MILLETT: Okay, that's very helpful.
 12 Mr Chairman, I think we should -- I have
 13 a two-minute credit, perhaps.
 14 SIR MARTIN MOORE-BICK: Well, I'm not sure about that!
 15 MR MILLETT: May I just break and just make sure that there
 16 are no other people in the room who want me to ask any
 17 further questions?
 18 SIR MARTIN MOORE-BICK: Well, it is usual to have a break at
 19 this stage.
 20 MR MILLETT: It is. May I ask for that break?
 21 SIR MARTIN MOORE-BICK: Yes, of course.
 22 MR MILLETT: Thank you.
 23 SIR MARTIN MOORE-BICK: Ms Cooney, sometimes when counsel
 24 thinks he has reached the end of his questions, a bit of
 25 checking suggests that he hasn't, so I would normally

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1 rise for a couple of minutes at this point to give
 2 Mr Millett a chance to see whether there are other
 3 questions that need to be put to you.
 4 So I will ask you to go with the usher now and we
 5 will rise for a short time to see whether there are more
 6 questions for you.
 7 A. That would be fine. I would like, if I have the
 8 opportunity, to go back to a question regarding I think
 9 it was 3.3.3, where I think I could offer a little bit
 10 more information.
 11 SIR MARTIN MOORE-BICK: Was there something you wanted to
 12 complete?
 13 A. Yes.
 14 SIR MARTIN MOORE-BICK: Let's do that first then.
 15 MR MILLETT: Yes, 3.3.3. That would be {TMO10001925/9}.
 16 SIR MARTIN MOORE-BICK: First of all, is that the passage
 17 you had in mind?
 18 A. It was. It was in relation to how we were talking about
 19 diagram 52 and firefighting shafts, et cetera, and
 20 I was -- whilst I was having a break, I was having
 21 a think of where that could possibly have come from and
 22 could it have meant anything else, and just given the
 23 way that it's written, in so much as the lobby is to
 24 provide a minimum 30-minute -- I think in that regard
 25 I was relating not to the firefighting shaft but

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1 actually to a lobby off the firefighting shaft, to the
 2 accommodation, so -- which would typically be that. So
 3 I think that's where that has come from, I just wanted
 4 to clarify that.
 5 SIR MARTIN MOORE-BICK: All right. Thank you.
 6 Mr Millett, do you want to follow that up at all?
 7 MR MILLETT: Yes, Mr Chairman, I don't want to follow up on
 8 that. Well, I might, but let's take a break, and if
 9 there is a spare question which comes crawling out of
 10 the woodwork, I will explore it.
 11 SIR MARTIN MOORE-BICK: Ms Cooney, we will have the break
 12 now. If you would like to go with the usher, please.
 13 THE WITNESS: Thank you.
 14 SIR MARTIN MOORE-BICK: Right, Mr Millett, you let me know
 15 via the usher when you are ready.
 16 MR MILLETT: Yes, it will not be long.
 17 SIR MARTIN MOORE-BICK: You will not need more than a few
 18 minutes?
 19 MR MILLETT: I will not.
 20 SIR MARTIN MOORE-BICK: Right.
 21 (4.47 pm)
 22 (A short break)
 23 (4.51 pm)
 24 SIR MARTIN MOORE-BICK: Yes, Mr Millett. You have found
 25 something?

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1 MR MILLETT: I have found some and some have been found.
 2 SIR MARTIN MOORE-BICK: Yes. Will you ask Ms Cooney to come
 3 back in, please.
 4 (Pause)
 5 SIR MARTIN MOORE-BICK: Ms Cooney, I'm afraid Mr Millett has
 6 found a few more questions.
 7 THE WITNESS: Okay.
 8 SIR MARTIN MOORE-BICK: I hope they won't take too long.
 9 THE WITNESS: That's fine.
 10 MR MILLETT: Ms Cooney, I'm sorry to detain you further, but
 11 I have one or two minutes of further questions.
 12 Can I ask you to go back, since you raised it, to
 13 section 3.3.3 of your report, which should still be on
 14 the screen, at page 9 {TMO10001925/9}. In the
 15 second-from-last paragraph, you say:
 16 "As there is a single escape route from the building
 17 at this level, the exit should be lobbied to provide a
 18 minimum of 30 minutes fire resisting construction ..."
 19 We heard your answer about that which you wanted to
 20 explain just before we rose a moment ago, but would it
 21 not be important to explain to the reader that, on any
 22 view, a 60-minute fire resisting construction was
 23 required of the door into the firefighting shaft in
 24 accordance with diagram 52?
 25 A. I could have stated the diagram number, but I think it

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1 already says that in the words. With this at the time
 2 being a level of non-residential accommodation, the
 3 firefighting shaft itself has a core which is protected
 4 to two hours and one-hour fire doors. As there is
 5 a single escape route from the building at this level --
 6 I think that's the relationship of the office with the
 7 firefighting shaft itself. So because it's a different
 8 purpose group, it should be lobbied off from the
 9 residential.
 10 So that's the -- having read it back and thought
 11 about it, and having time to kind of wonder where it was
 12 I was looking at at the time, that to me would make much
 13 more sense than ... it's just with it saying that the
 14 exit ... it just raised a question in my head whilst
 15 I was on break, so I wanted to just --
 16 Q. Yes, I can understand that. It is not the clearest and
 17 is apt to confuse, really, isn't it?
 18 A. Well, coming back to it eight years later and not having
 19 the drawings in front of me, I -- you know, I needed
 20 a few minutes to look at it, so that's --
 21 Q. Indeed, thank you.
 22 Can I ask you, then, to be shown {EX000000388}.
 23 It's an email we looked at just before the end of your
 24 questions, 10 September, the one you sent to Mr Ashton.
 25 I think I did ask you about the penultimate paragraph,

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1 and touched on significant approvals risk in the last
 2 paragraph. I just want to focus one or two questions on
 3 that.
 4 You say:
 5 "Generally, there is a significant approvals risk
 6 with the current proposals ..."
 7 To what extent were you concerned that the current
 8 proposals might not be safe?
 9 A. With the proposals as they stood -- and I am not aware
 10 of what eventually was chosen -- the principle of once
 11 you're in a stair, you should descend in that stair to
 12 a final exit, was being varied. So the approvals risk
 13 is that if we are then bringing people out of that stair
 14 enclosure without adding additional fire precautions,
 15 then that represents a significant approvals risk from
 16 the regulators as well as not being satisfactory from
 17 our point of view.
 18 Q. So is it right that you were concerned that the current
 19 proposals would not comply or might not be seen to
 20 comply with the Building Regulations?
 21 A. They carried a significant approvals risk that the
 22 regulators would not be favourable with that design,
 23 so --
 24 Q. Yes.
 25 A. And the design needed to be changed.

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1 Q. Yes, it's really what I wanted to understand by
 2 approvals risk. By risk, do you mean that there is
 3 a chance that building control might understand that it
 4 was actually non-compliant, or that they might
 5 misunderstand and think wrongly that it was
 6 non-compliant?
 7 A. An approvals risk is a risk that the -- the risk of it
 8 being approved is diminished, so it may result in
 9 a refusal of that particular design.
 10 Q. Right. If you were concerned that the current proposals
 11 might not comply with the Building Regulations, why
 12 didn't you say so expressly?
 13 A. Well, I did, in the form of this email and the one to
 14 Andrew Martyn. I may well have had conversations around
 15 that as well, but I've certainly raised it in those two
 16 emails.
 17 Q. Did you think that the current proposals didn't comply
 18 with the Building Regulations and there was a risk that
 19 building control would see that?
 20 A. I think that the current layout, as it was shown, wasn't
 21 acceptable, which is why I asked for additional design
 22 changes to make sure that it could become a design which
 23 would provide the right level of safety, so in that way
 24 reduce the risk of it being rejected.
 25 Q. You say "acceptable". Do you mean non-compliant?

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1 A. The word "compliant" is, you know, compliant with what?
 2 Q. With Building Regulations.
 3 A. With Building Regulations. So, yes, essentially, if the
 4 regulator didn't feel that it met with the requirements
 5 of any of the parts of part B, then, yes, it was a risk
 6 that they could say no.
 7 Q. Either it complies or it doesn't. Really what I'm
 8 trying to get at here --
 9 A. Yes, either it complies or it doesn't, but the ways in
 10 which it can comply, you know, are subject to various
 11 design criteria, really, you know. There are several
 12 ways of compliance. It's not necessarily following
 13 a specific guide to the letter. That's -- you know,
 14 there are variations that can also be equally
 15 acceptable. So in terms of the approvals risk, it's
 16 a risk of the regulators saying, no, it doesn't meet
 17 with their requirements.
 18 MR MILLETT: Thank you.
 19 Ms Cooney, thank you very much, and thank you for
 20 your patience. I'm very grateful to you for coming down
 21 here today and helping us with our investigations.
 22 Thank you for your evidence.
 23 THE WITNESS: No problem, thank you.
 24 SIR MARTIN MOORE-BICK: I endorse that. We are very
 25 grateful to you for coming. Sorry the day has been

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1 rather longer than perhaps you had wished or hopes, but
 2 at least we got your evidence finished today. Thank you
 3 very much. So you are free to go.
 4 THE WITNESS: Thank you.
 5 (The witness withdrew)
 6 SIR MARTIN MOORE-BICK: Now, before we formally call an end
 7 to the today's proceedings, can I just do two things:
 8 one is to thank the transcribers and the document
 9 managers, because it's been a long day for you as well
 10 and your fingers, I suspect, get quite tired by this
 11 time, so thank you very much.
 12 The other thing is briefly to say something about
 13 where we go tomorrow.
 14 Overnight we will look at the responses we have
 15 received during the course of the day to the
 16 consultation note we sent out yesterday about the best
 17 way forward, and it may be I will be in a position to
 18 say something more concrete about that tomorrow. But
 19 I think for the purposes of tomorrow we should work on
 20 the basis that we will continue as we have today; in
 21 other words, a limited-attendance hearing, but on
 22 a voluntary basis.
 23 I'm pleased to see that there are quite a lot of
 24 empty seats towards the back of the room, and I think it
 25 would be very desirable if tomorrow as many people

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1 absented themselves as is reasonably practicable and
 2 followed the proceedings online. But we have another
 3 witness who has come from the north of England to give
 4 evidence tomorrow, and I would like to take her evidence
 5 on the basis that we have as few people exposed to the
 6 risk of numbers as we can.

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7 So tomorrow we will go ahead on the basis of
 8 a limited-attendance hearing, but, as I say, on
 9 a voluntary basis, and then we will take it from there.

10 All right? So 10 o'clock tomorrow, please. Thank
 11 you very much.

12 (5.00 pm)

13 (The hearing adjourned until 10 am
 14 on Tuesday, 17 March 2020)

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