

OPUS 2

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Grenfell Tower Inquiry

Day 27

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1 Monday, 27 July 2020
 2 (10.00 am)
 3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 4 today's hearing.
 5 Today we're going to hear evidence from another
 6 former employee of Rydon who was engaged on the
 7 Grenfell Tower refurbishment.
 8 I think that's right, isn't it, Ms Grange?
 9 MS GRANGE: Yes. Mr Hughes.
 10 SIR MARTIN MOORE-BICK: Could you see if Mr Hughes is there,
 11 please.
 12 MR DAVID HUGHES (affirmed)
 13 SIR MARTIN MOORE-BICK: Thank you very much, Mr Hughes. Sit
 14 down, make yourself comfortable. All right?
 15 THE WITNESS: Yes, thank you.
 16 SIR MARTIN MOORE-BICK: Good.
 17 Yes, Ms Grange.
 18 Questions from COUNSEL TO THE INQUIRY
 19 MS GRANGE: Good morning, Mr Hughes. Thank you very much
 20 for coming to give evidence today, it's very much
 21 appreciated.
 22 Can you give the Inquiry your full name.
 23 A. David Alan Hughes.
 24 Q. So I'm going to be asking you the questions today. If
 25 you have any difficulty understanding anything I'm

1

1 asking you, please either ask me to repeat the question
 2 or put it in a different way.
 3 Also, if you feel that you need a break at any
 4 point, please just let us know.
 5 Also, can you try and keep your voice up, because
 6 the transcriber is there to your right, and she is
 7 taking down all your transcript.
 8 A. Okay.
 9 Q. You have made two witness statements to the Inquiry.
 10 They're in a folder on the desk in front of you, and I'm
 11 going to bring them up on the screen. This is
 12 {RYD00094213}. So this is your first witness statement.
 13 It's dated, if we go to page 27 {RYD00094213/27}, we can
 14 see there, 26 September 2018.
 15 Is that your signature there?
 16 A. That is, yes.
 17 Q. Are the contents true to the best of your knowledge?
 18 A. Yes, they are.
 19 Q. Thank you.
 20 You have made a second statement, if we can pull
 21 that up now, that's at {RYD00094349}. We see it's
 22 a short second statement dated 5 September 2019. You
 23 submitted this in order to correct an error in your
 24 first statement.
 25 Again, is that your signature there?

2

1 A. That is, yes.
 2 Q. Great. Are the contents true to the best of your
 3 knowledge?
 4 A. Yes, they are.
 5 Q. If we just pick up that error now, so going back to your
 6 first statement, {RYD00094213/14}, the error you're
 7 correcting, I think, is at 61.7 of that paragraph. The
 8 date there, 5 May 2018, you say should read 5 May 2016;
 9 is that correct?
 10 A. That is correct, yes.
 11 Q. Great, thank you for that.
 12 I want to start with some questions about your
 13 background and experience.
 14 At paragraph 2 of your main statement
 15 {RYD00094213/1} you say you started work for the Rydon
 16 Group over 20 years ago as a site engineer's assistant.
 17 Is that right?
 18 A. Yes, that's correct.
 19 Q. You also say you started working full-time at Rydon in
 20 November 2001 after getting a degree in civil
 21 engineering from Plymouth University. Is that correct?
 22 A. Yes.
 23 Q. Great.
 24 Did that degree include any aspects of fire safety?
 25 A. Not to my recollection, no.

3

1 Q. Okay.
 2 Then at paragraph 5 of your main statement, if we
 3 can pull that up, you list out there a number of
 4 relevant training courses and relevant certifications
 5 that you hold relating to your site-based role.
 6 If we can look over the page {RYD00094213/2} at
 7 those, we have a list of those; so, for example, site
 8 management safety training scheme, temporary works
 9 co-ordinator, construction plant competence scheme, we
 10 see those set out there.
 11 A. Yes.
 12 Q. Just thinking back, would any of those courses have
 13 covered the functional requirements of the
 14 Building Regulations?
 15 A. No.
 16 Q. No, okay.
 17 Now, if we can go to paragraph 4 of your witness
 18 statement, just back a page {RYD00094213/1}, we see
 19 there that you say:
 20 "I ran my first project from pre-commencement stage
 21 through to handover as a site manager in 2009. I have
 22 worked on a number of occupied refurbishment projects as
 23 either the main site manager or managing a section of
 24 works reporting to a project manager. I have worked on
 25 projects with cladding before, albeit not of the size of

4

1 Grenfell Tower. I have managed an occupied
2 refurbishment project of an 11 storey tower in Worthing,
3 but this did not have any aluminium cladding."

4 Do you see that there?

5 A. Yes.

6 Q. Just to ask you a few more questions about this: was the
7 Grenfell Tower project the biggest project you had
8 worked on at that time in terms of a refurbishment
9 project?

10 A. No, I worked on one -- one of the early ones I worked on
11 was about a £20 million refurbishment of a huge estate
12 where I did a lot of work on externals of blocks, but
13 they were generally brick-clad blocks, masonry blocks.

14 Q. Yes.

15 You talk there about some projects with cladding
16 which you worked on before.

17 A. Yeah.

18 Q. Approximately how many projects had you worked on
19 involving overcladding?

20 A. One really where I came in contact with aluminium
21 cladding would be one in Clapham, but I didn't do the
22 outside of the building. So I was aware of it, but
23 I was doing the internals, so I worked on the internals
24 of a number of flats there.

25 Q. Was that the Chalcots Estate?

5

1 A. No, I never worked on Chalcots.

2 Q. No, okay.

3 Sorry, carry on, so there was that one --

4 A. There was also another one where I did a small bit of
5 aluminium cladding on a ground-floor nursery, but I had
6 not done anything sort of high-rise cladding.

7 Q. So does it follow that you hadn't done any cladding for
8 buildings over 18 metres?

9 A. That's true.

10 Q. Yes.

11 You said you had done a low-rise aluminium cladding;
12 can you remember what the cladding comprised of?

13 A. It was aluminium and behind it was Kooltherm K15
14 insulation, but it was for a ground-floor nursery.

15 Q. Was it a solid aluminium panel or do you know whether --

16 A. I believe it was solid, yes.

17 Q. Okay.

18 Do you recall whether, on any of the projects you
19 worked on previously, fire safety advice was sought in
20 relation to the project?

21 A. On the ones I managed, no, I don't remember. I couldn't
22 tell you on the ones where I wasn't project manager.
23 That wouldn't have been my role.

24 Q. On any of the projects that had involved cladding, were
25 you aware that any cavity barriers had been installed

6

1 for any of those buildings?

2 A. I remember cavity barriers being installed on the one
3 where I was on the internals, but I don't remember on
4 the ground-floor nursery.

5 Q. But if you were on internals, that was not something --

6 A. Yeah, it wasn't something I was managing at the time, it
7 was something I remember seeing on the building, but
8 I wouldn't personally be managing the subcontractor
9 putting them on.

10 Q. So was Grenfell the first project you were involved in
11 where you had to be looking at cavity barriers in
12 a serious way?

13 A. In respect of the cladding, yes.

14 Q. Yes.

15 A. But I'm aware of cavity barriers behind masonry in terms
16 of compartmentation behind brickwork.

17 Q. You talked there about the 11-storey tower in Worthing
18 and you say it didn't have any aluminium cladding. Just
19 to be clear, did the project involve any overcladding at
20 all?

21 A. No, no overcladding at all, it was repointing of the
22 masonry brickwork.

23 Q. Right.

24 Just turning to your role on the Grenfell project,
25 you describe your role as a site manager. That's at

7

1 paragraph 22 of your witness statement. Can we just
2 look at that. That's at {RYD00094213/5}. You say
3 there:

4 "My personal involvement in the project was as a
5 Site Manager. Stephen Blake (Steve Blake), the
6 refurbishment director, spoke to me on Monday
7 19th October 2015 and asked me to help out at the Tower
8 from the next day. I was asked to manage the completion
9 and handover of the cladding and communal M&E
10 (Mechanical & Electrical) systems and generally help out
11 where I thought it was needed."

12 Do you see that there?

13 A. Yes.

14 Q. Can you help us, just in general terms, what did
15 managing the completion and handover of the cladding
16 actually involve?

17 A. Well, the cladding, when I went up there, was already
18 well under progress, so it would have been finishing off
19 the insulation -- well, finishing off the works,
20 basically, to the satisfaction of the people who needed
21 to see it.

22 Q. Yes.

23 Then you also say that you were asked to "generally
24 help out where I thought it was needed".

25 Again, can you just expand on what that involved.

8

1 A. Well, essentially it ended up being: I looked after the
 2 ground-floor entrance lobby, so I managed the works
 3 completing that, and I ended up essentially taking over
 4 Simon O'Connor's role, but that wasn't what was agreed
 5 with me at the time. But I saw that one of the things
 6 that was needed was, well, interaction with the client,
 7 so I became the main client go-to.
 8 Q. You say there that wasn't what was agreed with you at
 9 the time.
 10 A. No.
 11 Q. When you talk about "at the time", do you mean at the
 12 time you first started on the project?
 13 A. Yes, that's it, yeah.
 14 Q. So was it up to you to identify where your help was
 15 needed or was that something you were told?
 16 A. It was partly up to me. As I say, Steve said to me, "Go
 17 up there and help out where needed", so it was ... yeah.
 18 Q. Did anyone at Rydon tell you that there were specific
 19 issues that required your help, and if so, what were
 20 those?
 21 A. I don't remember specifically, no, but as I said,
 22 I originally got sent up there, Steve told me I would be
 23 looking after the cladding and I would be helping manage
 24 the M&E systems as well.
 25 Q. Did you ever get a written job description?

9

1 A. Not for going up there, no, but I know what my job
 2 entails.
 3 Q. Yes.
 4 On the other projects you have worked for with
 5 Rydon, had you ever had a written job description?
 6 A. No, but it's part of our group procedures, is
 7 I understand what a site manager entails or what the job
 8 entails.
 9 Q. When you say part of your group procedures, does that
 10 mean that somewhere there is a written document
 11 explaining exactly what a site manager does and doesn't
 12 do?
 13 A. Yes, yeah, what a site manager does.
 14 Q. Yes, okay.
 15 A. So that is my job description as far as I'm concerned.
 16 Q. And you read that before you started on the Grenfell
 17 project?
 18 A. I've read it, yes.
 19 Q. If we can turn to some minutes, this is {RYD00060234},
 20 these are minutes for the progress meeting number 17
 21 that took place on 17 November 2015 which you attended.
 22 A. Yes.
 23 Q. Yes, we can see your name five lines down there.
 24 On page 3 {RYD00060234/3}, at the top of the page,
 25 at item 2.9, we see there it says:

10

1 "Item 3.4: Rydon Management Team - Action ..."
 2 Then it says "SB" -- is that Steve Blake?
 3 A. That is, yes.
 4 Q. "... to publish revised Rydon on-site Management
 5 Structure. SB noted that David Hughes' role had
 6 expanded to pick up anything not covered by the other
 7 site managers."
 8 Do you see that there?
 9 A. Yes, I do.
 10 Q. So at this point on the project -- so this is
 11 November 2015 -- what was envisaged in terms of the
 12 expansion of your role?
 13 A. Essentially you would say that I took over the
 14 number one site manager role.
 15 Q. Right, yes.
 16 A. So I was the head of the team.
 17 Q. Were you more experienced than the other site managers?
 18 A. I believe I was, yes.
 19 Q. And more senior to them within Rydon?
 20 A. Not in terms of job title, no. They were all site
 21 managers; I was site manager as well.
 22 Q. I see.
 23 A. But I have managed other site managers on jobs
 24 previously. So the one at Worthing I had a site manager
 25 and a site assistant reporting to me.

11

1 Q. Yes.
 2 What did you understand when you joined the project
 3 about Rydon's contractual obligations on the Grenfell
 4 project? Were you given any information about that?
 5 A. No, but one of the first things I did when I went up
 6 there was to read the specification and to try and read
 7 as much of the paperwork as I could do.
 8 Q. Okay. So when you say read the specification, was that
 9 the NBS specification?
 10 A. Yes. Normally on most jobs I've worked on they're
 11 called ERs, or employer's requirements, but on this job
 12 they were called the NBS spec.
 13 Q. Yes. Yes.
 14 And did you read any other parts of the contract?
 15 A. In terms of the actual contract documents, I don't
 16 remember reading them specifically, but I wouldn't be
 17 interested in that; I was interested in what the
 18 specification was.
 19 Q. But just to be clear, you didn't have a briefing from
 20 anybody, anyone senior to you, about what the scope of
 21 the contract was?
 22 A. Well, the scope of the contract was to deliver the
 23 specification.
 24 Q. Right, I see, yes.
 25 Now, we've been provided with the contract documents

12

1 by Rydon, and I want to ask you some key questions about
2 in general what you knew.

3 Were you aware of Rydon's responsibility for design
4 on the project --

5 A. Yes, I was.

6 Q. -- as well as for the construction? You were.

7 Were you aware that it was Rydon's obligation to
8 complete the works in a proper and workmanlike manner
9 and in accordance with good building practice?

10 A. Yes, it is on all contracts.

11 Q. Were you also aware that Rydon was to complete the works
12 in compliance with the contract documents and other
13 statutory requirements, including the
14 Building Regulations?

15 A. Yes.

16 Q. Would you have taken that to have included complying
17 with British and European standards, where appropriate,
18 or appropriate codes of practice?

19 A. If it's specified in the specification, then yes.

20 Q. Now, there is just one clause I want to take you to, and
21 it will become evident later why we want to look at this
22 now.

23 If we can pull up the contract, this is
24 {RYD00094235/64}. So this is the JCT design and build
25 contract. If we could just blow up the top of that,

13

1 I want to look at clause 2.2.2, so that's the second
2 paragraph, the one below the one that's struck out. Do
3 you see that there?

4 A. Yes.

5 Q. If we just read that, it says:

6 "The Contractor shall not make any substitution for
7 any materials goods or workmanship specified or
8 described in the Employer's Requirements or (if not
9 specified or described in the Employer's Requirements)
10 as set out in the Contractor's Proposals or in the
11 specifications revised and returned to the Contractor by
12 the Employer in accordance with the Contractor's Design
13 Submission Procedure set out in Schedule 1 without the
14 prior consent (not to be unreasonably withheld or
15 delayed) in writing of the Employer."

16 That's a slightly long clause, but the key point
17 there is: were you aware that the contractor was not to
18 be making any substitution of materials from that showed
19 in the specification in the employer's requirements
20 without the prior consent in writing of the employer?

21 A. I've not read the JCT contract, but I am, well, aware of
22 the principle, yes, we are contracted to do what was in
23 the specification.

24 Q. But were you aware that if you were going to change
25 anything in that specification, say any materials that

14

1 had been specified, were you aware that then there was
2 a need to get the prior consent of the employer?

3 A. No.

4 Q. No.

5 Were you also aware in general that Rydon was fully
6 responsible for the design of the works, including the
7 co-ordination and integration of the designs and the
8 interface between different design elements?

9 A. Yes, because we were the main contractor.

10 Q. Yes.

11 So I think it does follow from your answers, but do
12 you agree that, in order to ensure that the work
13 complied with the Building Regulations, someone at Rydon
14 would have to analyse the specification, which formed
15 part of the employer's requirements, together with the
16 drawings provided by the architect?

17 A. Yes, yeah.

18 Q. Now, were you aware of someone in Rydon analysing the
19 specification during the project and checking compliance
20 with the Building Regulations?

21 A. Not with Rydon's, but I always understood -- my
22 experience of design and build is that we then
23 subcontract the designs part out to the architect and
24 the other specialist designers.

25 Q. So take the cladding, who did you think at the time was

15

1 responsible for making sure that --

2 A. I thought Harleys were responsible for the cladding, but
3 I also knew that Studio E were the lead designer, so
4 they had a sort of overarching role at the top of the
5 design.

6 Q. But to your knowledge, nobody else within Rydon was
7 checking that the designs were compliant with the
8 Building Regulations?

9 A. Not like that, no.

10 Q. No.

11 When you were reading the NBS specification -- you
12 said that you went to site and you found a copy of it
13 and had a look at it -- what was the purpose for which
14 you were reading it?

15 A. To understand what we were down to build. My job is to
16 understand the plans and specification and deliver that
17 to the client.

18 Q. Yes. Were you also looking at the standards that --

19 A. I don't necessarily read every word of it. I try and
20 take out what I need to know. So I was -- I'm aware
21 that -- well, aware that every job we're trying to do is
22 to a good standard.

23 Q. But if there was a specific standard that was specified,
24 for example for the external works which you were
25 responsible for site managing, would you ever go and

16

1 have a look at that standard?

2 A. Further documentation, no.

3 Q. Now, as we've just discussed, Rydon was under a duty to
4 ensure that the works were carried out in compliance
5 with the contract documents, which included the
6 employer's requirements. I just want to look at some of
7 the other project particulars which form part of the
8 contract.

9 Can we go to {TMO10041791/86}. So these were the
10 project particulars which formed part of the contract
11 between Rydon and the TMO. Do you ever remember looking
12 at these during the time you were the site manager?

13 A. As I said, I read it, but I would be looking for things
14 specific to my job, so more the materials and everything
15 else. Particulars is -- as I say, they are general
16 stuff, so it wouldn't be something I would particularly
17 be looking at in detail.

18 Q. Yes, I understand.

19 Can I just take you to, I think, three references
20 within this, just to ask you about whether you were
21 aware of the general points that were being made in
22 these documents.

23 Can we go on and look at page 128 {TMO10041791/128}.
24 This is under "A32 Management of the Works", and we see
25 at the top of the page under clause 110 it says

17

1 "Supervision" and it says there:

2 "General: Accept responsibility for coordination,
3 supervision and administration of the Works, including
4 subcontracts."

5 Do you see that there?

6 A. Yes.

7 Q. Was that your understanding when you worked on the
8 project, that that was Rydon's responsibility?

9 A. Yes, that pretty much sums up my sort of job title as
10 well, that's -- the site manager, that's what I do.

11 Q. Yes, thanks, that's helpful.

12 Moving down the page, towards the bottom, we see
13 a heading there, "Building Control". It says there:

14 "The Contractor will be responsible for providing
15 additional Construction Stage information to Building
16 Control."

17 Do you see that there?

18 A. Yes, I do.

19 Q. Was it in fact part of your role to be providing that
20 construction stage information to Building Control in
21 practice?

22 A. In practice, no. Generally, from my experience,
23 architects co-ordinate with Building Control, so they
24 provide the drawings, that sort of -- we sort of -- part
25 of their package or design, that's what they do.

18

1 Q. I see. We will come on and look at your interactions
2 with Building Control when they visited the site, but
3 just to be clear, you didn't think it was part of your
4 role to be providing construction stage information to
5 them?

6 A. No, that's not true. If they asked for stuff, I would
7 provide it. But generally, to start with, it's the
8 architect who provide the drawings. But if I'm asked
9 for something, I will try and provide -- do my best to
10 provide it for them.

11 Q. Yes.

12 Now, if we go on to page 135 {TMO10041791/135}
13 within this document, in the bottom half of the page
14 there you see a clause 170A, which is headed
15 "Manufacturer's recommendations/instructions". Do you
16 see that there?

17 A. Yes, I do.

18 Q. It says:

19 "General: Comply with manufacturer's printed
20 recommendations and instructions current on the date of
21 the invitation to tender."

22 Do you see that there?

23 A. Yes, I do.

24 Q. You can see at the end it says:

25 "Agreement certified products: Comply with

19

1 limitations recommendations and requirements of relevant
2 valid certificates."

3 Do you see that there --

4 A. Yes.

5 Q. -- as well?

6 Now, in general, was it part of your role to check
7 whether the manufacturer's recommendations and
8 instructions had been complied with on site?

9 A. Yes, in some respects, yes, it is.

10 Q. Yes. So you might see it as part of your role to check
11 what the manufacturer's recommendations were, say for
12 the installation of a particular product?

13 A. Yes. Sometimes, if necessary, I will look at
14 manufacturer's recommendations, yes, to make sure we're
15 installing it correctly.

16 Q. Yes, and make sure it was installed as per those
17 recommendations.

18 A. Yes.

19 Q. Yes.

20 Was that role something you also expected the clerk
21 of works to be checking --

22 A. Yes.

23 Q. -- on this project? Yes. Again, I'm going to ask you
24 a little more about their role on the Grenfell project
25 later.

20

1 So taking the cladding system as an example, did you
 2 check the instructions, for example, for the
 3 installation of the Celotex insulation?
 4 A. I don't remember specifically checking it, but I do
 5 remember reading the brochure at one point because one
 6 of the first questions I asked was about whether or not
 7 it needed silver tape, and I remember checking the sort
 8 of product literature for that.
 9 Q. Ah, okay. Great, yes. I'm going to come back and ask
 10 you about that specific thing in due course.
 11 A. Yes, I'm sorry.
 12 Q. So you did have recourse to look at the Celotex brochure
 13 at that point?
 14 A. I don't think it was the brochure, I don't remember
 15 specifically looking -- there was a couple of bits on
 16 our system or in our file folder and I went through
 17 them.
 18 Q. Yes.
 19 What about the Siderise cavity barriers? Do you
 20 remember ever checking the instructions for the
 21 installation of those cavity barriers?
 22 A. No, I don't remember that.
 23 Q. Now, staying with this document, these project
 24 particulars, if we go on to page 141 [TMO10041791/141]
 25 of this document, about halfway down, we see at

21

1 paragraph 630 a heading "Quality control" and it states
 2 there:
 3 "Procedures: Establish and maintain to ensure that
 4 the Works, including the work of subcontractors, comply
 5 with specified requirements.
 6 "Records: Maintain full records, keep copies on
 7 site for inspection, and submit copies on request."
 8 Do you see that there?
 9 A. Yes.
 10 Q. Then there is various items identified for then contents
 11 of records below it, including, for example, the "Nature
 12 and extent of nonconforming work found"; do you see that
 13 there?
 14 A. Yes.
 15 Q. Was it any part of your role to ensure that records were
 16 kept including the matters set out in this clause,
 17 quality control records?
 18 A. It would be part of that, but yeah, we have a quality
 19 control sort of inspection regime at Rydons, essentially
 20 called snagging.
 21 Q. So the snagging process was the quality control process?
 22 A. Yes.
 23 Q. And it was just that, was it?
 24 A. Yes.
 25 Q. Did Rydon have any written procedures in place to ensure

22

1 that these quality control obligations were complied
 2 with?
 3 A. As I said, the -- well, it's in -- part of the
 4 procedures is snagging procedures.
 5 Q. Right.
 6 Can you help us as to how records were actually kept
 7 on site where there had been quality control
 8 inspections?
 9 A. As I say, the snags I took were recorded and kept in,
 10 well, the snagging folder on -- in the job folder.
 11 Q. And hard copies kept on site?
 12 A. I don't remember hard copies. As I say, I generally
 13 scan a snag sheet and then will email it out to the
 14 subcontractors as required.
 15 Q. Yes.
 16 Just touching on the point about maintaining and
 17 ensuring that the works, including the work of
 18 subcontractors, comply with specified requirements: who
 19 within Rydon had responsibility for ensuring that the
 20 roles and responsibilities of subcontractors were clear
 21 and adhered to?
 22 A. I would say we all have a role in doing that. That's
 23 what we do: we manage subcontractors --
 24 Q. Yes.
 25 A. -- to do the work for us.

23

1 Q. Yes.
 2 A. They have a responsibility for themselves to do the
 3 works accordingly as well.
 4 Q. So you saw that as part of your role as site manager?
 5 A. Yes.
 6 Q. I just want to ask you a couple of questions about what
 7 others in Rydon have said about the role of site
 8 manager.
 9 A. Okay.
 10 Q. So Gary Martin has said -- if we pull this up, this is
 11 [RYD00094216/2]. At paragraph 8 he says there:
 12 "During my time on the project Simon O'Connor was
 13 senior site manager and Simon Lawrence was contracts
 14 manager. Both left during the project and Steve Blake
 15 assumed the roles; Steve also brought in David Hughes as
 16 site manager to oversee the project."
 17 Do you see that there?
 18 A. Yes, I do.
 19 Q. I think that chimes with an answer you gave earlier, but
 20 was that how you saw your role, that you were overseeing
 21 the project?
 22 A. That's what my role became; it wasn't what I was told
 23 when I went up there. So, as I said, possibly you could
 24 say that one of the biggest holes that needed to be
 25 filled was the number one role, and I assumed that role.

24

1 Q. Did you feel when you got on to site that that number
2 one role hadn't been filled properly?
3 A. It became clear within a week or so. As I say, part of
4 what I've always done when I go on to a new site, I look
5 for drawings, documents, look at the programme and see
6 what the job entails, essentially.
7 Q. Yes.
8 A. And, yeah, from sort of chatting to the other site
9 managers, they all had their roles and responsibilities,
10 and it also -- I don't know whether if it's just the way
11 I am, but very soon I became the client go-between or go
12 to. Claire very quickly started coming to me and
13 I guess that became my role.
14 Q. Yes.
15 Just a couple of points. Claire, that was Claire
16 Williams, was it?
17 A. Claire Williams, yes, sorry.
18 Q. From the TMO.
19 A. The client, yes. Claire, the client.
20 Q. When you say it became clear -- I think you said within
21 a couple of weeks or within a week or so it became
22 clear --
23 A. Yeah.
24 Q. -- precisely what was it that became clear to you?
25 A. Well, just that, yeah, there was a space to be filled or

25

1 an overarching role at the top, so -- and I had
2 fulfilled that role before at Rydon's.
3 Q. So did you feel that the site managers that were on site
4 needed more direction and supervision?
5 A. No, they were aware of what they were doing, but they
6 had never been told to sort of run the site, and to
7 my -- I know Gary had run a site previously with another
8 manager underneath him. I wasn't sure that Jason had
9 done so. Also, although I had left Rydon's and I said in
10 my thing I had come back to them, I had fulfilled that
11 role previously.
12 Q. Yes. So you felt that someone was needed to "manage the
13 site"?
14 A. Yes.
15 Q. Simon Lawrence has said in his witness statement -- if
16 we can look at this, this is {RYD00094220/8}.
17 Paragraph 44 starts at the bottom there, and he says:
18 "My role included regular visits to site to guide
19 and support the Site delivery team (Project Manager,
20 Site Managers, etc). The Site Delivery Team is based on
21 site and ensures the day-to-day works are managed safely
22 and correctly to the design."
23 Do you see that there?
24 A. Yes.
25 Q. So, again, would you agree that your role included

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1 ensuring that the works were managed correctly to the
2 design?
3 A. Yes.
4 Q. Yes.
5 A. Always does, as a site manager.
6 Q. You have confirmed it was part of your role to manage
7 the subcontractors.
8 A. Yes.
9 Q. We know that your remit included the exterior and the
10 cladding; that's correct, isn't it?
11 A. Yes.
12 Q. Does that mean it was your responsibility to be managing
13 Harley once you got to site?
14 A. Depends what you consider managing. I don't manage
15 Harleys; I supervise them on site and I help manage sort
16 of the interaction they have with the other
17 subcontractors, the residents as well, but I don't
18 manage Harleys.
19 Q. I see, yes.
20 Did you consider it any part of your supervision of
21 Harley to ensure that the works that they were carrying
22 out complied with the Building Regulations?
23 A. Specifically I would say that they should know the
24 regulations, as specialist subcontractor, they should
25 know them as well. I don't know them as well as they

27

1 do, so I was making sure that their work was to a good
2 standard and the standard that had been, well,
3 accepted -- will be accepted by the client.
4 Q. I see.
5 A. Well, the client and Building Control and the clerk of
6 works.
7 Q. Yes.
8 So just coming on, then, to your knowledge of the
9 Building Regulations and associated guidance, we know
10 that the contractual obligations of Rydon included
11 ensuring compliance with the Building Regulations, and
12 we know that your role included dealing with
13 Building Control officers on site; that's correct, isn't
14 it?
15 A. Yes, and so did the other site managers' roles include
16 this.
17 Q. Yes, yes.
18 A. They would show the Building Control officer round their
19 part of the works, or sometimes, if they're not around,
20 I would show them around as well, but ...
21 Q. How would you describe your knowledge at the time of the
22 Building Regulations?
23 A. It comes from experience. It's something I've never
24 been taught, so it comes from experience.
25 Q. Would you have known what the functional requirements

28

1 were in the Building Regulations in schedule 1?
 2 A. No.
 3 Q. No. Do you know what --
 4 A. Well, the functional requirements is to create a safe
 5 building, is my understanding, so ...
 6 Q. So if anyone had asked you broadly what the functional
 7 requirements were that you had to comply with for the
 8 Building Regulations, would you have been able to give
 9 them an outline?
 10 A. No, in terms of outline, no.
 11 Q. At the time you were working on the project?
 12 A. No. Yeah.
 13 Q. So does it follow that, within Rydon, you have not ever
 14 attended any courses or training on the
 15 Building Regulations?
 16 A. No, not that I remember. They would always come up in
 17 certain sort of safety modules, but not in any great
 18 detail.
 19 Q. So you weren't familiar, for example, with part B4,
 20 "External fire spread", of the Building Regulations?
 21 A. No.
 22 Q. Were you aware in general that there was a requirement
 23 that the walls should adequately resist the spread of
 24 fire?
 25 A. In that terms, no, I was not aware. I would say nobody

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1 should build an unsafe building, but in terms of
 2 specifics, no, I wouldn't be able to give you the words.
 3 Q. Yes.
 4 Now, there's practical guidance which is issued to
 5 help in the interpretation of the --
 6 A. Yeah.
 7 Q. -- Building Regulations by way of approved documents.
 8 A. Yeah.
 9 Q. Have you ever heard of the approved documents?
 10 A. I have heard of --
 11 Q. Have you ever read any of the approved documents?
 12 A. The only one I remember reading is -- I think it's
 13 part M to do with disabled --
 14 Q. Yes.
 15 A. -- things. So, as I said, the first project I managed
 16 was eight disabled flats, so I was looking for some
 17 information to do with them at the time, so I read it.
 18 Q. Yes.
 19 A. But they wouldn't be the first documents I would go to.
 20 I would go to an NHBC book, which I think is a more
 21 practical -- for my job is a more practical document,
 22 far more sort of descriptions and more measurements,
 23 descends into a bit more detail, which is what I'm
 24 after.
 25 Q. So does it follow from your answers that you hadn't read

30

1 and you weren't familiar with Approved Document B on
 2 fire safety at the time you worked on the Grenfell
 3 project?
 4 A. At the time, no, I was not aware.
 5 Q. Were you aware that there was, just in general terms,
 6 special guidance for buildings above 18 metres?
 7 A. At the time, no.
 8 Q. So you weren't aware, for example, about guidance
 9 surrounding the insulation and --
 10 A. No, at the time I was not aware.
 11 Q. So you weren't aware that there was particular fire
 12 performance that insulation over 18 metres was
 13 recommended to achieve?
 14 A. No.
 15 Q. Had you ever heard of the phrase "class 0"?
 16 A. Yes.
 17 Q. What did you think that meant?
 18 A. I had heard of it in terms of paint finishes in communal
 19 areas. I knew it was -- as I say, as far as I was
 20 concerned it was fire resistance.
 21 Q. Had you ever heard of class 0 in connection with
 22 a cladding system or a cladding panel?
 23 A. No, but going back to reading the specification, I noted
 24 in it that the fire resistance, it said class 0, so ...
 25 Q. When you say reading the specification --

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1 A. Yeah.
 2 Q. -- do you mean the NBS specification?
 3 A. The NBS, sorry, yes.
 4 Q. Do you remember which part you were reading --
 5 A. Specifically I think that was in the cladding section.
 6 Q. Right, okay.
 7 Were you familiar at all or did you have any
 8 knowledge about firestopping and cavity barriers?
 9 A. From my experience previously on site as and when it's
 10 shown on the drawings.
 11 Q. Had you ever looked at any specific guidance that helped
 12 you about, for example, where cavity barriers should be
 13 placed in an external wall?
 14 A. Specifically, no, I don't remember looking at it, but to
 15 me they would always be shown on drawings.
 16 Q. Yes. So you would rely on the drawings to show you
 17 where the barriers needed to be?
 18 A. Where the cavity barriers should be.
 19 Q. Were you aware that the guidance in ADB required cavity
 20 barriers to be provided around window openings?
 21 A. No, I wasn't.
 22 Q. Had you ever worked on a project before which had
 23 involved cavity barriers around windows?
 24 A. In masonry things, where you have a cavity construction
 25 with an outside or inside skin of brick, yes, cavity

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1 barriers go round windows, and on timber frames, as
 2 I said before, where they're shown on the drawings, I'll
 3 put them.
 4 Q. But if they're not shown on the drawings?
 5 A. I didn't know, no.
 6 Q. Okay. We'll come back to that in a moment.
 7 So you weren't aware of the guidance in Approved
 8 Document B or, for example, diagram 33 about cavity
 9 barriers?
 10 A. Not specifically, no, I was not aware.
 11 Q. Were you aware of guidance suggesting that cavity
 12 barriers had to be tightly fitted to a rigid
 13 construction and mechanically fixed in position?
 14 A. I would expect them always to be properly fixed.
 15 Q. Yes.
 16 So during your time on the project, were you aware
 17 of any other industry guidance that provided commentary
 18 on external wall constructions, including for buildings
 19 above 18 metres? You said earlier that you might --
 20 A. As I said, NHBC guidelines. That's more of the document
 21 I would go to, to fulfil my role and look at if there
 22 was any sort of details or queries, that would be my
 23 first port of call.
 24 Q. Yes.
 25 Do you have any recollection of reading any specific

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1 guidance documents, industry guidance documents, about
 2 the cladding when you worked on the Grenfell project?
 3 A. No.
 4 Q. So, for example, would BR 135 mean anything to you?
 5 A. No, I never read that.
 6 Q. No. Any BCA, Building Control Alliance, guidance?
 7 A. No.
 8 Q. Or what about the CWCT?
 9 A. No.
 10 Q. No. So nothing about cladding, curtain walling?
 11 A. No, I didn't read any of those documents.
 12 Q. Had you heard of the phrase "limited combustibility" --
 13 A. No.
 14 Q. -- at the time you worked on the project?
 15 A. No.
 16 Q. No, so that wouldn't mean anything to you?
 17 A. No.
 18 Q. Were you aware that industry guidance made it clear that
 19 cavity barriers are required around windows?
 20 A. No, I wasn't aware.
 21 Q. Okay.
 22 So just finishing this topic, you talk about this in
 23 your statement, about what you would expect in terms of
 24 compliance. Can we look at paragraph 21 of your
 25 statement, {RYD00094213/5}. You say there:

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1 "In terms of compliance with the building
 2 regulations from a site manager's point of view, when
 3 a drawing is issued to us through any of the design
 4 team, if it is a 'construction issue' drawing, then the
 5 works shown on the drawing should be compliant with the
 6 building regulations. The ongoing and completed works
 7 were the subject of inspection by the Royal Borough of
 8 Kensington and Chelsea Council ... Building Control
 9 surveyors, the two Clerks of Work employed by KCTMO ..."
 10 A. Yes.
 11 Q. We've got that there, yes.
 12 Does that mean that you expect that any construction
 13 issue drawing would be compliant with all the relevant
 14 Building Regulations?
 15 A. Yes, that would ...
 16 Q. You talked about the drawings that were approved for
 17 construction. In the case of the external wall was that
 18 Harley's drawings which had been stamped "Approved for
 19 construction"?
 20 A. Yes, they were the drawings I was using for the cladding
 21 or I was looking at.
 22 Q. Yes.
 23 So did you ever think it was part of your role or
 24 anyone else's role within Rydon to be checking if
 25 a drawing was in fact compliant with the

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1 Building Regulations?
 2 A. No, I would expect the designers to ensure that
 3 a drawing is correct and compliant. So, as I say, as
 4 I said at Grenfell, it was Harleys and it was the
 5 architect.
 6 Q. Yes.
 7 A. Because Harley's drawings also came out of the sections
 8 or the big sections that the architects had.
 9 Q. Yes.
 10 Now, Simon Lawrence has said in his witness
 11 statement -- if we can just look at that, this is
 12 {RYD00094220/10}. I just want to look at paragraph 51.
 13 I just want to look at the very last sentence. It
 14 starts five lines up in that paragraph 51. He says:
 15 "Although I have no expertise or qualifications as
 16 a designer, my experience as a construction manager
 17 meant that if I saw something that was obviously wrong
 18 then I would challenge that and I would have expected
 19 the rest of the Rydon team, and indeed all of those
 20 involved in managing the project, to do the same."
 21 So I just want to check: was that your
 22 understanding, in terms of your role, that if you saw
 23 something obviously wrong, you were expected to
 24 challenge that?
 25 A. Yes. If my knowledge said that it was wrong and my

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1 experience sort of in the past, I had come across it and
 2 I thought it was wrong, then I would challenge it, yes.
 3 Q. Okay.
 4 Now, just in terms of your introduction to the
 5 project, if we could go back and look at paragraph 22 of
 6 your witness statement, {RYD00094213/5}. We read this
 7 earlier. You made it clear you were being told on
 8 Monday, 19 October that you needed to help out at the
 9 tower from the next day, and you also say a little bit
 10 further on that you were made aware that Simon Lawrence,
 11 the Rydon contracts manager, was leaving Rydon.
 12 So it looks like you were asked to join the project
 13 at very short notice, literally one day's notice; is
 14 that correct?
 15 A. Yes, that is correct.
 16 Q. Do you know why that was? Was it that Mr Lawrence was
 17 leaving unexpectedly, or do you think the suddenness of
 18 your appointment was just due to maybe a lack of
 19 forethought?
 20 A. I don't know in that respect, you would have to ask
 21 Steve, but it's not -- it has happened to me in the past
 22 where I had one day's notice, so ...
 23 Q. So that didn't seem surprising to you?
 24 A. No, it's happened before.
 25 Q. Yes.

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1 A. Or sometimes you get a call saying, "I need you
 2 somewhere else tomorrow", and it's like: okay ...
 3 Q. Now, at paragraph 26 of your witness statement, if we
 4 could look on at that, page 6 {RYD00094213/6}, you say
 5 in that first sentence:
 6 "By the time I first attended site the cladding was
 7 well-progressed and I would estimate 75% to 80%
 8 complete."
 9 Do you see that there?
 10 A. Yes.
 11 Q. Can you help us as to what you mean by complete?
 12 A. As in when I got there, a lot of the cladding panels
 13 were already in the building, so the majority of
 14 insulation was there, there was a lot done.
 15 Q. Yes. When you say the cladding panels, you mean the
 16 column cladding panels on the exterior?
 17 A. On the exterior, yes.
 18 Q. That was already done?
 19 A. Yeah.
 20 Q. How did you estimate the percentage you came up with
 21 there, 75 to 80%?
 22 A. I must admit, I estimated on the time process, but
 23 probably, looking back on what other people have said,
 24 possibly that was an overestimation, but I would say
 25 certainly over two-thirds was done. It was well

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1 under way.
 2 Q. Yes. Yes, that's what I was about to ask you.
 3 So if we just look at a couple of contemporaneous
 4 progress reports, I think what we might see is it was
 5 more like somewhere between 60 and 70% complete.
 6 A. Yes. So it was well over two-thirds. Two-thirds to
 7 three-quarters is ...
 8 Q. Let me just show you those. If we go to {RYD00056956},
 9 this is the site progress report, and it's dated
 10 October 15. If we look at the very bottom of that page,
 11 there is a table. Do you see that there?
 12 A. Yeah.
 13 Q. And it's got "External façade works", and planned
 14 progress: 100%, actual progress: 60%, and it looks like
 15 it's around ten weeks behind schedule. Do you see that?
 16 A. Yes, I do.
 17 Q. Again, was that your understanding when you got to site,
 18 that the cladding was progressing slower than had been
 19 planned?
 20 A. I was aware it was behind schedule, yes.
 21 Q. We can see it says in the first bullet point below that
 22 table:
 23 "External cladding progressing slower than needed
 24 due to insolvency."
 25 Do you see that there?

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1 A. Yes.
 2 Q. Was that Harley's insolvency?
 3 A. Yes, it was.
 4 Q. Yes.
 5 Then there is just another report I was going to
 6 take you to, {RYD00057623/11}. This is progress report
 7 number 16 which reports on progress from
 8 12 September 2015 to 16 October 2015. If we can go on
 9 to page 14 {RYD00057623/14} we see a table, and you can
 10 see there we've got "External works", and it says,
 11 "Façade - Grid work, insulation and windows", that's 90%
 12 complete, I think; is that correct? Can you see that?
 13 A. Yes.
 14 Q. Then "Façade - Cladding panels", it seems to be saying
 15 70% out of 100, do you see that there?
 16 A. Yes.
 17 Q. And 16 weeks behind, do you see that?
 18 A. Yes, I do.
 19 Q. So I think you have agreed that, based on these reports,
 20 perhaps the cladding was not quite as advanced as you
 21 said in your witness statement.
 22 A. Yes. I would certainly say it was definitely around
 23 two-thirds. So, as I said, it was well under way.
 24 Q. Yes.
 25 A. In places it was finished, with the finished panels on

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1 the building.
 2 Q. Yes, I understand.
 3 Now, in terms of previous fires in residential
 4 buildings, when you started work on the project, did you
 5 have in mind that there had been previous fires in
 6 high-rise buildings in the cladding?
 7 A. When I started on the project, the only one I was aware
 8 of was Lakanal House, but I must admit, I did not know
 9 that as a cladding fire. I was aware it was
 10 a compartmentation failure, that there was failures in
 11 basically the voids above the ceilings.
 12 Q. Yes.
 13 A. So that I think had come across in a fire safety
 14 training.
 15 Q. Yes.
 16 A. So I did not know it was a cladding fire.
 17 Q. Yes, that's helpful, yes.
 18 So had you heard of any other domestic fires in the
 19 UK in high-rise buildings --
 20 A. No.
 21 Q. -- in the cladding?
 22 A. No.
 23 Q. Or any international high-rise fires?
 24 A. At the time when I started there, no.
 25 Q. No.

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1 Were you aware that in January 2012 a fire had
 2 occurred at Taplow House on the Chalcots Estate project?
 3 A. Yes, I was aware of that, because I had spoken to Steve
 4 a couple of times about it, so I was aware there was
 5 a bad fire there, and also he told me that cladding
 6 panels had worked fine there, there was no issue with
 7 them.
 8 Q. Right. He specifically said that to you, did he?
 9 A. Yes.
 10 Q. Can you remember when he said that to you?
 11 A. I used to catch a train home with Steve sometimes and we
 12 had conversations afterwards, and yeah, he said that
 13 they had warped but they certainly hadn't caught fire.
 14 Q. Yes.
 15 Were you ever made aware of an incident report
 16 prepared following the fire which had emphasised the
 17 importance of cavity barriers around the windows?
 18 A. No, I wasn't.
 19 Q. Now, if we look at paragraph 24 of your witness
 20 statement, if we can go back to that on page 6
 21 {RYD00094213/6}, you say this:
 22 "In my first week on site I spoke to Simon Lawrence
 23 a number of times, who was the Rydon contracts manager
 24 for the project, about the cladding and the M&E systems.
 25 Simon also showed me around the project. Simon left

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1 Rydon on the Friday of the week that I became involved."
 2 Do you see that there?
 3 A. Yes, I do.
 4 Q. Can you recall what your discussions about the cladding
 5 involved?
 6 A. It was to do with, as I say, the progress of it more.
 7 I know I went up the mast climber, I don't know which
 8 one, but with Simon to have a look. He introduced me to
 9 the installers and I think he also introduced me to
 10 Ben Bailey, the supervisor for them. But specifically,
 11 no, I don't remember exactly what those conversations
 12 were. Obviously I was new to the job at the time and
 13 trying to take an awful lot in.
 14 Q. Yes.
 15 Was there anything particular you remember him
 16 emphasising about the cladding other than the progress
 17 that had been made?
 18 A. More the fact that nobody had any issues with it, that's
 19 what I remember, that everyone was happy and, as I say,
 20 the standard had been set, so keep to that standard and
 21 it would be fine.
 22 Q. When you say no one had any issues, do you mean --
 23 A. I mean Building Control -- I knew Building Control had
 24 been up the mast climbers with them, and I knew that the
 25 clerk of works made regular trips up the mast climbers

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1 as well to look.
 2 Q. Was your understanding that he was talking about the
 3 quality of the installation?
 4 A. Yeah, I would say the quality.
 5 Q. Did you ask him any questions about the cladding at this
 6 time?
 7 A. I would hope I did, but I don't remember specific
 8 questions.
 9 Q. Fair enough.
 10 A. I'm trying to glean his knowledge at the time, so, yeah,
 11 I wouldn't be able to do that unless I asked questions,
 12 but I don't remember specifically what questions they
 13 were.
 14 Q. Do you remember him telling you about what products were
 15 being used in the construction of the cladding?
 16 A. Talking about the cladding panels, I knew -- I was told
 17 they were ACMs, and I knew -- I could see that the
 18 insulation was solid insulation.
 19 Q. What did you understand the ACM to mean?
 20 A. Well, whatever it -- I can't remember off the top of my
 21 head now, but yeah, it was a sandwich panel, aluminium
 22 on the outside and plastic on the inside.
 23 Q. Right, yes, and --
 24 A. Basically it was aluminium composite material.
 25 Q. What did you know about the insulation at that point?

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1 A. That it was solid insulation, that it was Celotex.
 2 Q. Yes.
 3 A. As I say, I know it was solid insulation, Celotex.
 4 Q. Did you have any discussions with him about compliance
 5 with the Building Regulations, anything along those
 6 lines?
 7 A. Specifically, no, I don't remember any specific
 8 conversations, as I say, but I would have asked him
 9 about Building Control and sort of his visits and his
 10 name and sort of contact details.
 11 Q. Yes.
 12 Now, at paragraph 26, just below that, of your
 13 witness statement, in the last five lines, I just want
 14 to pick up what you say there. You say:
 15 "In order to better understand how the cladding
 16 system worked and so that I could form a view as to
 17 where we were relative to the programme, I reviewed the
 18 drawings, considered the programme of works and I spoke
 19 to the cladding installers, Taff (Mark Osbourne(sic))
 20 and Bez (Graham Berry), and Ben Bailey, the project
 21 manager from Harley Facades."
 22 Do you see that there?
 23 A. Yes, I do.
 24 Q. Now, can you recall what kind of drawings you considered
 25 concerning the cladding at this stage?

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1 A. Well, it would have been the Harleys drawings.
 2 Q. Yes.
 3 A. So they would have looked there, but I would also look
 4 at the architectural drawings as well, so the section
 5 drawings -- I would look at all the drawings relevant to
 6 the work that I was doing.
 7 Q. Where did you physically find those?
 8 A. They generally were on drawing clips in the site office,
 9 or they also are on -- saved on our system as well.
 10 Q. Right.
 11 A. Our sort of management system.
 12 Q. Was it your practice to look at them in hard copy or
 13 electronically?
 14 A. Both, like I say.
 15 Q. Yes.
 16 A. Both.
 17 Q. Yes.
 18 Did you ever look at Harley's subcontract and the
 19 specification that they had been asked to achieve?
 20 A. No, but I was aware, and, as I say, my understanding was
 21 always on previous sites that designers sort of go
 22 back -- what I considered back-to-back with us on design
 23 and build contracts. So we would pass on the design
 24 responsibilities and everything we were contracted to do
 25 on to them.

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1 Q. Yes.
 2 I just want to show you one document that formed
 3 part of Harley's subcontract, {ART00000914}. This is
 4 part of the specification. It's Curtins Consulting, so
 5 it's the structural engineers that put this together.
 6 A. Yes.
 7 Q. 1 March 2013.
 8 Do you have any recollection of ever looking at this
 9 document?
 10 A. I believe I did, but I don't remember any specifics from
 11 it. It's sort of quite a high technical document.
 12 Q. Yes, yes.
 13 Just within that, if we can look on page 11
 14 {ART00000914/11} of the document, and at
 15 paragraph 7.1.13 it says there:
 16 "The system should comply fully with the
 17 recommendations of the BRE [report] ..."
 18 Then there is a BRE report there.
 19 Do you remember noticing that the system they were
 20 installing had to comply with certain BRE guidance?
 21 A. No, I don't remember that specific clause.
 22 Q. No.
 23 Then on page 13 {ART00000914/13}, 7.2.4, we can see
 24 there it says:
 25 "The cladding system shall meet the requirements of

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1 rainscreen cladding as specified in ..."
 2 And then it's got the standard for walls with
 3 ventilated rainscreens and various other key --
 4 A. Yes. So the section H92 was the section in the NBS
 5 specification.
 6 Q. Yes, correct. But did you note that they had to meet
 7 the requirements of the standard for walls with
 8 ventilated rainscreens, the CWCT 1998 standard?
 9 A. I don't remember seeing that, but I do remember the CWCT
 10 bit in the NBS specification. So I don't remember it in
 11 this document, but I do remember it in the NBS.
 12 Q. Yes.
 13 So obviously you were there to supervise Harley's
 14 work.
 15 A. Mm-hm.
 16 Q. What documents did you think you needed to read in order
 17 to be able to do that effectively?
 18 A. To do my job effectively, it is the plans and
 19 specifications. That's what I work to.
 20 Q. Now, we saw earlier that you also said in paragraph 26
 21 that you spoke with employees of Osborne Berry and
 22 Harley.
 23 A. Yes.
 24 Q. Can you recall what you discussed with Osborne Berry?
 25 That's Taff, Mark Osborne, and Bez, Grahame Berry. Do

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1 you recall what you discussed with them?
 2 A. Specifically, no, but it would have been in general
 3 terms, as in the process they're going to -- as I say,
 4 a lot of this -- or sometimes it's: what do they need
 5 from me to be able to do their work, ensuring that,
 6 yeah, the bits that Rydons managed -- the access, the
 7 towers, things like that -- that they were -- all the
 8 things. So it was in specific terms -- no, sorry,
 9 non-specific terms.
 10 Q. I understand, yes.
 11 A. Sorry.
 12 Q. What about with Ben Bailey of Harley?
 13 A. Very, very similar conversations. As I say, when I went
 14 up there, I knew my role was to finish it off, so what
 15 did they need from me to finish it off? As I say, then
 16 it would be sort of programming, how long do they think
 17 it's going to take them to finish, when can I start
 18 offering up the façades to the people who needed to see
 19 it, so Building Control and the clerk of works.
 20 Q. Yes.
 21 You said in that paragraph of your witness
 22 statement -- the phrase you used was that you had these
 23 conversations in order to better understand how the
 24 cladding system worked.
 25 A. Yes.

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1 Q. What were you particularly interested in in terms of how
 2 it worked?
 3 A. The building process. So there is a process you go
 4 through. So, as I say, in that respect, putting the
 5 rails on, fitting the insulation, putting the cladding
 6 panels on.
 7 Q. Yes.
 8 A. That's in very simplistic terms, but to me it was
 9 a process that they had to go through to get -- finish
 10 the product, so --
 11 Q. So the layering process of each product.
 12 A. Yes, the layering process, if you want to describe it
 13 like that, yes.
 14 Q. Yes.
 15 Can we just look at an email from Ben Bailey to you.
 16 This is at {RYD00060605}. So this is Ben Bailey to you,
 17 8 December 2015, so a couple of months after you started
 18 on site.
 19 A. Yeah.
 20 Q. And it's headed, "Scratches in Cladding", and he says:
 21 "Dave,
 22 "As per our conversation, I can confirm that light
 23 surface scratches will not adversely affect the
 24 performance or longevity of the cladding panels where
 25 the scratch has not penetrated through to the core."

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1 Do you see that there?
 2 A. Yes, I do.
 3 Q. Can you recall the conversation that you had? Because
 4 he says, "As per our conversation".
 5 A. That came about after one of our inspections up the
 6 towers, and I believe it was the first one we did with
 7 Building Control and the clerk of works, so it might
 8 have been the first time I took them up there.
 9 Q. Yes.
 10 A. They noticed scratches on there and they were right at
 11 the top of the building. But they were asking for us to
 12 change the panels, and I said, "Well, could we repair
 13 them, they're not going to be visible sort of 24 storeys
 14 up, a little scratch like that", and Building Control
 15 and the clerks would rather they were swapped, so this
 16 was Ben sort of saying to me, "Look, we could repair
 17 them and it's not going to affect their performance in
 18 any way, shape or form".
 19 Q. Yes.
 20 A. It was, as I say, what I saw, little scratches.
 21 Q. During that conversation did you enquire or were you
 22 made aware that the cladding was made of ACM containing
 23 a combustible polyethylene core?
 24 A. I did not know it was combustible.
 25 Q. So you just thought it was plastic; is that right?

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1 A. In general terms, yes, it was, yeah, two sheets of
 2 aluminium held together -- sort of glued together with
 3 a plastic inside, or -- what was it? -- PE.
 4 Q. Had you heard the phrase "PE" at the time? Was that
 5 talked about?
 6 A. I don't believe I knew it was PE, no.
 7 Q. No.
 8 A. More just, yeah, plastic inside.
 9 Q. So you didn't know the middle was polyethylene?
 10 A. I don't remember specifically. I might have been told
 11 that was the material, but it didn't sort of register in
 12 that respect.
 13 Q. When Mr Bailey mentions the performance here, and he
 14 says it won't adversely effect the performance, what did
 15 you understand him to mean by performance?
 16 A. That a scratch on the outside is not going to affect its
 17 performance, so ...
 18 Q. But performance in terms of what?
 19 A. Well, just more in terms of longevity, but it wouldn't,
 20 as I say, get in there, possibly -- I don't know whether
 21 aluminium rusts, or -- so, yeah, it would still last as
 22 long as it was supposed to, which I believe is around
 23 25 years.
 24 Q. So do you think there was any part of the discussion
 25 that focused on fire performance?

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1 A. No, certainly there wasn't any discussing fire
2 performance at that time.
3 Q. Now, at the time you started work on the project, were
4 you aware of different kinds of cladding panels
5 available in the UK market?
6 A. My -- well, my -- I remember the one -- I talked about
7 the nursery, that was just a solid aluminium panel, but
8 no, specifically in terms of, like, all the products out
9 there, no, I wasn't aware. But I was aware that it was
10 the same panel being used that was used at Chalcots and
11 Ferrier. So I was aware that this was the same panel
12 that had been fitted to all the other six towers or
13 high-rises that Rydons had done.
14 Q. How did you know that? Who made you aware of that?
15 A. I think that came through Steve, and it might also have
16 been through Harleys, because I know also Harleys did
17 the Chalcots Estate.
18 Q. So prior to this project, had you ever come across metal
19 composite materials with different layers and
20 a different core?
21 A. I don't remember using them on any jobs previously.
22 Q. Yes.
23 A. So ...
24 Q. Were you aware that panels were also available with fire
25 retardant cores, which were less combustible?

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1 A. No, I wasn't aware at all.
2 Q. Were you aware at any stage that the rainscreen cladding
3 being installed at the tower included combustible
4 materials?
5 A. Not at all.
6 Q. No.
7 Were you aware at the time of working on the project
8 that if a fire occurred in the building which led to
9 significant flames being ejected from the window, the
10 cladding panels would likely fail because they would
11 melt and fall off the building? Was that something that
12 you were ever made aware of?
13 A. I had one conversation with Taff about it, but my
14 understanding or what I got in my head was the actual
15 fixings, the lug system where you hooked the panel on,
16 that little bit there would fail just through heat, in
17 the same way that I was told at Chalcots, they warped.
18 So I think it was more of a warping that I expected or
19 the plastic might lose a little bit of strength.
20 Q. When you say you had one conversation with Taff about
21 it --
22 A. Yes.
23 Q. -- were you then just describing the conversation you
24 had with Taff?
25 A. Yes, that's it, sorry, yes.

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1 Q. So that was about the fixings and whether they would
2 stay on --
3 A. Yes. It was my understanding, as I say, yeah. But the
4 way it was held on, it kind of hooked over the rail --
5 sorry, I'm doing motions.
6 Q. Yeah, no, it's fine.
7 A. It hooked over the rails, but those little bits of metal
8 would possibly fail or warp and that might make them
9 fall off.
10 Q. Did you ever discuss the fire performance of the
11 cladding panels themselves --
12 A. No.
13 Q. -- with anybody?
14 Kingspan Kooltherm K15, I want to ask you some
15 questions about that now.
16 A. Okay.
17 Q. So as part of your role as site manager, were you aware
18 of what materials were being stored on site at any
19 particular time?
20 A. Yes.
21 Q. Yes. And at any one time, were quantities of insulation
22 board stored on site for use behind the rainscreen
23 panels?
24 A. Yes.
25 Q. Yes.

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1 Did you have any knowledge at the time, were you
2 aware, of what the lead time was for ordering that
3 insulation?
4 A. It wouldn't -- as I say, that was Harleys, they were
5 a supply and fit -- or design, supply and fit
6 contractor, so it would be their responsibility to make
7 sure that it was there in a timely manner, so I wasn't,
8 no, really aware of how long it took them to get there,
9 or if I had been told, I don't remember it.
10 Q. Yes.
11 Now, we know that Celotex FR5000 was specified for
12 use on the tower in the NBS specification. Do you
13 remember noticing that when you read the NBS spec?
14 A. Yes.
15 Q. But we know that what was actually installed was
16 Celotex RS5000.
17 A. Yes.
18 Q. Were you aware of that when you worked on the project?
19 A. Yes, because on our system we had the datasheet for the
20 RS5000 and was told that -- I think I was told that it
21 was a wrong note in the specification. I think it's
22 something like "FR" stands for "flat roofs" or something
23 and "RS" stands for "rainscreen", so I was aware that
24 what we were fitting was what it was designed -- well,
25 it was being used for what it was designed to do.

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1 Q. When you say you were aware of that, who made you aware
2 of that?

3 A. I don't remember that, I'm afraid.

4 Q. But you do recall --

5 A. It was one of the conversations I would have had, or one
6 of the many conversations I would have had during the
7 time on the project. But I think it was quite early on,
8 I don't remember ...

9 Q. So you noticed that the insulation was different and the
10 explanation you were given was that was just a --

11 A. Yes.

12 Q. -- mistake --

13 A. Yes.

14 Q. -- in the NBS?

15 A. That's it. So -- yeah, specifications or little ...

16 Q. Yes.

17 Let's just look at paragraph 55 of your witness
18 statement now on this topic, {RYD00094213/10}. You say
19 there:

20 "In December 2015 or January 2016 I discussed with
21 Ben Bailey and agreed the use of Kingspan, as Harleys
22 had difficulty obtaining Celotex from their supplier.
23 As far as I was concerned Kingspan and Celotex are
24 similar products with similar insulation properties. As
25 far as Ben and I were concerned it was a like for like

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1 swap of insulating material. I told Steve Blake and the
2 Clerk of Works, Jon White, of this use of Kingspan
3 insulation material."

4 So you say that, and I just want to ask you some
5 questions about this.

6 So was this Kingspan insulation material Kingspan
7 Kooltherm K15 --

8 A. I think it was, yes.

9 Q. -- is that what you're talking about? Yes.

10 A. Yeah, because I'm pretty sure Ben gave me a datasheet
11 for it.

12 Q. Right, okay, yes. Did you read the datasheet he gave
13 you?

14 A. Yes, but what I was specifically looking for was the
15 insulating value. I knew why the Celotex was there,
16 I knew it was to try and achieve 50% better than the
17 Building Regulations in terms of insulating properties,
18 so I was asking Ben: were Celotex and Kingspan similar
19 insulating properties, ie have a very similar U-value.

20 Q. I see, yes.

21 What exactly did Ben Bailey say to you about this
22 swap?

23 A. That it was like-for-like. I'm pretty certain he gave
24 me a datasheet which said the U-value was the same or
25 very, very similar.

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1 Q. Did you ever discuss fire performance of the K15 --

2 A. No.

3 Q. -- with Ben Bailey?

4 A. No.

5 Q. Or with anybody else about the K15?

6 A. Never discussed fire performance of the insulation, no.

7 Q. Do you remember what quantity of insulation was said to
8 be involved in this swap at the time?

9 A. No, but I thought it would be kind of carrying on to
10 finish it off, because I knew, as he said, he was having
11 supply issues, so ...

12 Q. Do you remember who Harley ordered that insulation from?

13 A. No, I don't.

14 Q. No.

15 A. That wouldn't be something I would be aware of or need
16 to know.

17 Q. Now, was that K15 already on site when you had this
18 discussion, or was he saying --

19 A. No, I believe he was asking my permission to use it
20 going forward.

21 Q. So that would be to order it --

22 A. Yes.

23 Q. -- and then bring it on to site in the future?

24 A. Yes.

25 Q. Were you aware that quantities of Kingspan K15 had

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1 previously been ordered before you arrived at site?

2 A. Not aware at all, no. And I never saw it on the
3 building before in my sort of time going up the mast
4 climbers.

5 Q. When Mr Bailey had that discussion with you, did he give
6 you the impression that this was the first time this
7 swap had occurred?

8 A. Certainly, that's why I thought he was asking
9 permission.

10 Q. Can we just look at some of those purchase orders
11 previously just to make this point good. So this is at
12 {SIG00000012}, this is a Harley purchase order. It's
13 dated 26 May 2015, we can see that on the top right-hand
14 side. Do you see that there?

15 A. Yeah.

16 Q. It's to SIG, the company, SIG Insulation, Maidstone, and
17 then we can see in the main description it says:

18 "Kingspan K15 Insulation Board 1200x2400x80mm
19 (96 Sheets)."

20 You can see that. Then underneath it says:

21 "Delivery by vehicle with Moffet 04/06/15.

22 "Site has restricted entrance ..."

23 Do you see that there?

24 A. Yes, I do.

25 Q. We can see it's in the context of Grenfell Tower,

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1 because on page 3 {SIG00000012/3} of this purchase
 2 order, if you just scan --
 3 A. It says here at the bottom, it says "Ship to".
 4 Q. Yes, it does, and to be clear, there is a site plan
 5 given of Grenfell Tower just a few pages later.
 6 So that's the first purchase order we've seen, which
 7 was some time before you arrived on site in May 2015.
 8 If we can look at another one, this is
 9 {SIG00000013/2}, and if we look at the bottom of the
 10 page -- sorry, actually this is the email chain that
 11 leads to this, that's right. So if we look at the
 12 bottom of page 2, this is Gill Walker to Ben Bailey,
 13 26 May 2015, and she says, "Hi Ben". She is at SIG, we
 14 can see that from the bottom:
 15 "The delivery we arranged for the 3rd will now go on
 16 the 10th, Celotex have pushed out the lead time on this
 17 product!!"
 18 Then if we go up to the top of page 2 we see
 19 Ben Bailey's response. He says:
 20 "Are you joking?! Is K15 held in stock at the same
 21 thickness? Is the delivery for this week still on?"
 22 Do you see that there?
 23 A. Yes, I do.
 24 Q. Then bottom of page 1 {SIG00000013/1}, she says:
 25 "Yes delivery for this week is okay, they have

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1 production problems apparently!!! K15 80mm is not
 2 stocked but has a 3-5 day lead time."
 3 Do you see that there?
 4 A. Yes, I do.
 5 Q. Then at the top of page 1, he says:
 6 "As discussed please see [purchase order] attached
 7 for the K15 order (this quantity should be taken off the
 8 total [purchase order] on the Cellotex (sic) order issued
 9 on 25/03/15)."
 10 Do you see that there?
 11 A. Yes.
 12 Q. That was the purchase that we looked at.
 13 So I take it from your answers before you had no
 14 knowledge of any of this happening before you were on
 15 site?
 16 A. No knowledge at all, and I do not remember seeing it on
 17 the building at all.
 18 Q. That was my next question: do you remember ever seeing
 19 Kingspan --
 20 A. No.
 21 Q. -- Kooltherm K15?
 22 A. No, but a lot of the boards up on the thing were
 23 unbranded as well, so yeah, I didn't notice it.
 24 Q. Ah, right. What percentage of the boards would you say
 25 were unbranded?

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1 A. I don't know, off the top of my head.
 2 Q. But you remember --
 3 A. Yeah.
 4 Q. -- some of them being unbranded?
 5 A. Yeah.
 6 Q. But presumably when you got to site, I think you said
 7 earlier, a lot of the cladding panels were on there.
 8 A. Yes, so there was a good chance it was already behind
 9 panels which had already been fitted.
 10 Q. Yes.
 11 There is another order of K15 I just want to take
 12 you to. This is at {CCF00000019}. This is on
 13 10 September 2015. We can see this is an order to
 14 a different company, CCF, and it appears to be 49 units
 15 of Kingspan K15 rainscreen board. Do you see that
 16 there?
 17 A. Yes.
 18 Q. Harley Façades, and deliver to Grenfell Tower in the
 19 middle.
 20 A. Yeah.
 21 Q. Again, you didn't have any knowledge of this order when
 22 you started?
 23 A. No, as I said, prior to that conversation I had with
 24 Ben, I thought everything on that building was Celotex.
 25 Q. Now, I think you have made clear that the basis on which

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1 you considered them to be like-for-like products,
 2 similar products, was because of their U-value
 3 properties.
 4 A. Yes.
 5 Q. Is that right?
 6 A. Yes, and also from experiences. I've done lots of sort
 7 of this board in masonry cavities and it's always either
 8 Kingspan or Celotex. As far as I'm concerned, they were
 9 very -- I know them as solid insulation boards and they
 10 are very, very similar, as I said, and proved almost by
 11 the same thickness was the same U-value, so it does the
 12 same job.
 13 Q. Did you look at any K15 literature at this time?
 14 A. I remember Ben giving me the datasheet to basically
 15 prove that the U-value was the same. That's what I was
 16 after.
 17 Q. Do you recall looking at the fire performance --
 18 A. No, I don't.
 19 Q. -- on that datasheet? That wasn't something you looked
 20 at?
 21 A. No.
 22 Q. Did you know that Kingspan is a phenolic foam whereas
 23 the RS5000 is a poly --
 24 A. No, as I said, I knew it was solid insulation.
 25 Q. Yes.

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1 Did you ever consider the fire safety performance of
 2 K15?
 3 A. Specifically, no. But every job I've ever done has had
 4 that product, be it Celotex or Kingspan, in some
 5 quantity, be it in the walls, be it in roofs, be it
 6 under screeds.
 7 Q. Did you consult any of those who had specified the
 8 Celotex in the first place? For example, did you
 9 consult Studio E over the swap?
 10 A. No, I did not.
 11 Q. Exova, did you talk to Exova?
 12 A. No.
 13 Q. Did you talk directly or anybody you know of talk
 14 directly to Kingspan themselves about it?
 15 A. Not that I know of, unless Ben spoke to them.
 16 Q. Did you ever request a copy of the BBA certificate for
 17 the Kingspan material?
 18 A. I don't know.
 19 Q. So you don't remember ever seeing a BBA certificate?
 20 A. No.
 21 Q. I think it follows from your answers, but I want to ask
 22 you nevertheless: did you ever ask yourself whether the
 23 K15 product was of limited combustibility at any point
 24 in the project?
 25 A. I've never ever heard insulation described in terms of

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1 combustible or non-combustible, it's always just been
 2 solid or quilt insulation, that's how I know them.
 3 Q. Do you remember looking at an LABC certificate --
 4 A. No, I don't.
 5 Q. -- for Kingspan? No.
 6 Now, going back to paragraph 55 of your statement,
 7 on page 10 {RYD00094213/10}, you say in the last
 8 sentence that you told Steve Blake and Jon White of the
 9 use of this Kingspan insulation material. Can you
 10 remember when you told them that?
 11 A. I believe it was soon afterwards, after I had had the
 12 conversation with Ben.
 13 Q. Yes.
 14 A. Just to let them know that, yeah, there would be
 15 a different material on there, and I explained to Steve
 16 the reasons why, to do with supply issues, and I might
 17 have said the same to Jon. I remember having
 18 a conversation; I don't remember the specifics of it.
 19 Q. And you don't remember them saying to you, "Well,
 20 actually, it's already been used, we know that"?
 21 A. No, as I said, I wasn't aware it was on the building
 22 before I essentially said yes or agreed with Ben.
 23 Q. Did they ever ask to see any information about the K15?
 24 A. Not that I remember, no.
 25 Q. We've already discussed, and I showed you that specific

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1 clause, do you remember, 2.2.2 of the contract, that
 2 said that Rydon shouldn't substitute any materials
 3 without the prior written consent of the --
 4 A. Yes.
 5 Q. -- employer, the TMO. Was the TMO ever consulted about
 6 the intention to use the K15?
 7 A. No, unless Jon told them, but Jon was working for the
 8 TMO.
 9 Q. I see.
 10 I think it follows, but did you ever submit reasons
 11 for the proposed substitution?
 12 A. No, I did nothing in writing on this, no.
 13 Q. Did you provide Jon White with any documentation about
 14 the K15?
 15 A. I don't remember doing so, no.
 16 Q. Yes.
 17 Did you ever tell Building Control at any time that
 18 some of the insulation was K15?
 19 A. I don't remember, no.
 20 Q. So you don't remember whether Building Control ever were
 21 provided with any specification or written material
 22 about K15 on the project?
 23 A. Certainly I never gave them, so I would presume that,
 24 no, they never did get any.
 25 Q. We will come back to look at Building Control later.

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1 Why did you not think to tell Building Control that you
 2 were going to be using a different insulation product?
 3 A. Because, like I said, going back to my knowledge at the
 4 time, it was very, very similar. It's almost whoever --
 5 whichever -- Celotex or Kingspan, whichever one gets
 6 specified by the designer is what goes on the building.
 7 As I say, they are so similar to me from my knowledge
 8 and experience that I didn't see it as an issue.
 9 MS GRANGE: Mr Chairman, I just have one or two questions on
 10 this topic. If I could finish this topic and then we
 11 could break.
 12 SIR MARTIN MOORE-BICK: Yes, that's all right, thank you.
 13 MS GRANGE: Thank you.
 14 If we could go to paragraph 57 of your witness
 15 statement and look at {RYD00094213/11}. So at
 16 paragraph 57 you say there:
 17 "I was involved in the choice of plasterboard to the
 18 walls of the entrance atrium. I discussed this with
 19 Mark Dixon of SDP who suggested Duraline instead of
 20 Fireline plasterboard as Duraline was more resistant to
 21 impact, but still had the same fire rating. This change
 22 of plasterboard was approved by the architect."
 23 Do you see that there?
 24 A. Yes.
 25 Q. We can see that from an email. If we go to the email,

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1 this is {SEA00013533}. If we look at the bottom of
 2 page 1, there is an email from you to Neil Crawford of
 3 9 November at 9.40. You say:
 4 "Hi Neil
 5 "Thanks for visiting site on Friday, it was good to
 6 [meet] you."
 7 Then if we go over {SEA00013533/2}, you confirm with
 8 him then:
 9 "Following walkround, I'd like to confirm the
 10 following agreements ..."
 11 If we look at point 4 we can see it says there:
 12 "Duraline board to communal entrance lobby with
 13 a skim finish."
 14 Do you see that there?
 15 A. Yes.
 16 Q. We can see that, in this case, you did seek approval
 17 from the architect before changing the materials
 18 installed on site.
 19 Can you explain why, if you did that for this
 20 material, you didn't do it in relation to the K15 swap
 21 for the Celotex?
 22 A. Because specifically I was discussing with Neil at the
 23 time and it was part of the walk-round, the
 24 conversations we had about the finish to the lobby area.
 25 No, I can't explain why I didn't.

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1 Q. Okay.
 2 A. Sorry, I can't explain in relation to the K15 why ...
 3 Q. Yes, thank you.
 4 A. It just goes back to experience that they were very
 5 similar, in my mind. It was almost a similar, approved.
 6 MS GRANGE: Thank you.
 7 Mr Chairman, I think that's a good moment.
 8 SIR MARTIN MOORE-BICK: Right.
 9 Well, Mr Hughes, we are going to have a short break
 10 now and give everyone a chance to stretch their legs and
 11 so on.
 12 While you are out of the room, please don't talk to
 13 anyone about your evidence or anything related to it,
 14 and we will come back at 11.35, please.
 15 THE WITNESS: Okay.
 16 SIR MARTIN MOORE-BICK: If you would like to go with the
 17 usher, she will look after you.
 18 (Pause)
 19 Right, 11.35, please. Thank you.
 20 (11.17 am)
 21 (A short break)
 22 (11.35 am)
 23 SIR MARTIN MOORE-BICK: All right, Mr Hughes?
 24 THE WITNESS: Yes, thank you.
 25 SIR MARTIN MOORE-BICK: Are you ready to carry on?

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1 THE WITNESS: Yes, I am.
 2 SIR MARTIN MOORE-BICK: Thank you, Ms Grange.
 3 MS GRANGE: Thank you.
 4 Just a couple of follow-up questions on the K15
 5 before I move to a different topic.
 6 A. Okay.
 7 Q. I think you said in your evidence that you believed
 8 "Mr Bailey was asking my permission to use it"; do you
 9 remember --
 10 A. Or permission to change it.
 11 Q. Yes, yes.
 12 Who actually gave that permission? Did you
 13 understand that to be part of your role as site manager
 14 or did you ask --
 15 A. I wouldn't say "permission" is the right word; more
 16 agreement to use it, but ...
 17 Q. But you talked about speaking to Mr Blake about this.
 18 A. Yes.
 19 Q. Steve Blake. Were you asking him if he was content for
 20 the change and for his permission, or did you understand
 21 that you could give that permission, you were just
 22 informing Steve Blake of what had happened?
 23 A. I guess in that respect, I would say that I am taking --
 24 I was giving permission, yes. He was asking if he could
 25 use it and I was saying yes, as long as it complied with

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1 the U-values and it was a similar product.
 2 Q. Yes, that's helpful.
 3 Turning to a different topic now, I want to ask you
 4 about the window infill panels.
 5 A. Okay.
 6 Q. Principally I want to ask you about the white window
 7 infill panels, do you remember --
 8 A. Yes.
 9 Q. -- between the main windows on the tower.
 10 Now, can you confirm that the window frame
 11 installations were carried out by Harley and
 12 Osborne Berry?
 13 A. That's correct, yes.
 14 Q. Yes, and this included the aluminium window panel
 15 system, including those window infill panels, didn't it?
 16 A. Yes.
 17 Q. And it also included the section of the windows which
 18 housed the extractor fan for the kitchens?
 19 A. Yes.
 20 Q. Can we just look at a Harley drawing on this topic,
 21 {HAR00003953}. This is a drawing dated 3 March, and we
 22 can see it's marked "Approved for construction", and
 23 it's had various revisions, we can see at the bottom
 24 there. I just want to ask you: what we see -- it's not
 25 very clear, but I think we can find it -- is that those

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1 two panels we were just talking about are marked P1 and
 2 P2 on this drawing. If we zoom into the middle hatched
 3 section in the top left-hand corner, we see P1 for the
 4 main big infill panel, and then P2 for the little panel.
 5 Can you see that there?
 6 A. Yes, I do.
 7 Q. Would you have understood what you were looking at this
 8 drawing that that was referring you to the Harley
 9 specification, to their own specification notes?
 10 A. Yeah, all the little notes on there would refer you back
 11 to a specification or part of a specification.
 12 Q. Did you yourself ever make any investigations as to
 13 which materials made up the P1 and P2 panels?
 14 A. No, I did not.
 15 Q. So you didn't review Harley's specification notes for
 16 these two panels?
 17 A. No, but I would like to state, when I took over or when
 18 I went up to Grenfell, as far as I'm concerned pretty
 19 much all of the windows had been fitted.
 20 Q. Yes.
 21 Can we just look at those specification notes. This
 22 is {HAR00017762}. If we look on the left-hand side of
 23 that page, we can see, six items down, we get the
 24 "Glazing - P1 - panels", and below that we see the
 25 "Glazing - P2 - panels". Can you see those?

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1 A. Yes, I do.
 2 Q. Yes, in the middle of the page. For P1 panels we can
 3 see that the outer is a 1.5-millimetre aluminium skin,
 4 and the core is a 25-millimetre styrofoam; do you see
 5 that there?
 6 A. I do.
 7 Q. Then for the P2 panel, we can see it's got
 8 a 25-millimetre Kingspan TP10 rigid insulation, do you
 9 see that there, in the core?
 10 A. Yes.
 11 Q. Looking at this now, is your recollection that you
 12 didn't see this at the time of the project?
 13 A. I would have read this, but I don't remember noting
 14 that, and as I said before, I would expect it, by the
 15 time it got to me, to be compliant with
 16 Building Regulations.
 17 Q. Yes.
 18 Did you know what styrofoam was at the time?
 19 A. I had heard of it, sort of like egg cup kind of thing,
 20 I guess. But, yeah, I had heard of it.
 21 Q. Did you know that it was a trading name for extruded
 22 polystyrene insulation?
 23 A. No, I did not.
 24 Q. Does that mean that you didn't know when you were on
 25 site that those window infill panels had extruded

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1 polystyrene inside?
 2 A. Specifically like that, no.
 3 Q. So you didn't ever raise any concerns about the use of
 4 styrofoam or extruded polystyrene in these locations?
 5 A. No, because, as I said, by the time it got to me, I was
 6 sure it was compliant with Building Regulations.
 7 Q. Had someone said to you, "In those panels, by the way,
 8 we've got extruded polystyrene", maybe someone,
 9 you know, chatting on site says it to you, what would
 10 you have made of that? Would it have concerned you?
 11 A. If it complied with this and they were telling me it
 12 complied with what's on that piece of paper, I would
 13 have made nothing of it.
 14 Q. Yes.
 15 Now, the P2 panel, we just saw that the
 16 specification is for the Kingspan TP10 rigid insulation.
 17 Now, if we can look at a purchase order, just before you
 18 came on to site. If we look at {HAR00002477}, this is
 19 Ben Bailey on 11 September 2015 to ACP Panel Systems,
 20 and he attaches a purchase order. He says:
 21 "Please see [purchase order] attached to replace the
 22 one placed under Harley Curtain Wall Ltd (now in
 23 administration)."
 24 I just want to look at the purchase order which was
 25 attached to that, {HAR00000445}, dated 10 September. So

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1 that's the purchase order, and if we look at -- so it
 2 says:
 3 "Please supply panels as per the attached schedule."
 4 Do you see that in the middle? If we look at page 6
 5 {HAR00000445/6}, we can see a schedule, and at the top
 6 we see "Panel Spec: (P2)", that it's got a core of
 7 25-millimetre Kingspan TP10 rigid insulation; do you see
 8 that there?
 9 A. Yes.
 10 Q. Do you know -- I know you came on site in October, so
 11 a month or so after this -- whether TP10 rigid
 12 insulation was ever delivered to site and present
 13 on site?
 14 A. I don't remember seeing it, no, specifically noting it,
 15 no.
 16 Q. So the Inquiry's experts found from their site
 17 inspections after the fire that the panels used at the
 18 P2 location, where the extract fan is, didn't have
 19 a Kingspan TP10 core but had a styrofoam core and were
 20 extruded polystyrene.
 21 A. Okay.
 22 Q. Were you aware of that --
 23 A. No.
 24 Q. -- on the project?
 25 A. As I said, they had all been fitted by the time I

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1 started on the project.
 2 Q. I see. So you can't help us as to how --
 3 A. No.
 4 Q. -- we go from Kingspan TP10 to the styrofoam in that
 5 location?
 6 A. No, I can't.
 7 Q. And you didn't ever check the fire performance of the P1
 8 or the P2 panels?
 9 A. No.
 10 Q. No.
 11 I want to move on now to a new, a longer topic which
 12 is about site inspections.
 13 A. Okay.
 14 Q. Would you agree that there is a difference between
 15 supervising works and periodically inspecting works?
 16 A. Yes, I would.
 17 Q. Would you agree that in the case of the cladding
 18 elements of the construction, they're quickly concealed
 19 as work progresses on site?
 20 A. Yes.
 21 Q. So would you agree that it was important to have regular
 22 supervision of such works to ensure that the works were
 23 being conducted properly?
 24 A. Not always, no, because it's about a process that we
 25 can't watch at all times. So you watch them at the

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1 start, and then you have to, at a certain point, start
 2 to have an element of trust that people are going to do
 3 what they are contracted to do.
 4 Q. Yes.
 5 A. So if they've started off well and you're happy with
 6 that standard, and all you can see you sort of -- during
 7 supervision, you see they're maintaining that standard,
 8 I don't see that regular supervision, in terms of me
 9 seeing every single bit of insulation or firebreak
 10 behind there, is absolutely necessary.
 11 Q. How did it work out on the Grenfell project? What was
 12 the distinction, or was there a distinction between --
 13 A. Well, to me a periodic inspection would on a weekly
 14 thing, would be like a regular clerk of works, I would
 15 call that a periodic inspection because it's on a weekly
 16 or two-weekly basis.
 17 Q. Yes.
 18 A. Supervision is on a day to day and just managing or --
 19 as I say, supervising the works, managing the works,
 20 very similar. But to me also, periodic inspection would
 21 probably come under snagging; it is done after a certain
 22 period when something is ready.
 23 Q. Yes.
 24 Did you yourself have a period of time on site where
 25 you would say you were supervising, like when you

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1 initially got to site, and then you went to more of
 2 a periodic inspection regime?
 3 A. Sorry, in which respect are you talking about here?
 4 Q. The cladding in particular.
 5 A. Cladding. As I say, I was always supervising Harley's
 6 work. They're managing it, they're putting it on the
 7 building; I'm kind of supervising ... it's very
 8 similar -- sort of managing, supervising, to me are
 9 very, very similar terms. To me, it would be the same
 10 thing. If somebody says, "I'm supervising" or "I'm
 11 managing", very similar terms.
 12 Q. Do you agree that a design and build contractor needs to
 13 have in place a rigid site supervision regime to ensure
 14 that all construction carried out by itself or its
 15 subcontractors is compliant with the relevant designs,
 16 drawings, specifications, et cetera?
 17 A. It would certainly help, yes.
 18 Q. Can we look at something that's said in the Rydon
 19 company witness statement. So we have had a witness
 20 statement on behalf of the Rydon company itself. If we
 21 can look at {RYD00094236/23}. If we could look at
 22 paragraph 35 under (g) there, which is under the heading
 23 "Monitoring during the Works". It says:
 24 "[Rydon]'s role in refurbishment projects is that of
 25 main contractor. Typically this means it is also

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1 appointed as Principal Contractor for the purposes of
 2 the CDM Regulations. This means that it has significant
 3 experience of discharging its duties in respect of the
 4 planning, managing and monitoring of the construction
 5 phase, liaising with its subcontractors. This expertise
 6 and experience is encapsulated in the systems and
 7 procedures which [Rydon] used and continues to use to
 8 monitor the work of its subcontractors, which are in
 9 turn built on [Rydon]'s ISO 9001 accredited project
 10 management system ..."
 11 Do you see that there?
 12 A. Yes, I do.
 13 Q. Now, were you familiar yourself when you worked on the
 14 project with Rydon's ISO 9001 project management system?
 15 A. I know they got 9001, and, yes, I would say I was
 16 familiar with it. Didn't know every bit of detail of
 17 it, but I'm certainly familiar with it.
 18 Q. What practical effect did that have for you on site?
 19 What were you aware of in terms of procedures that you
 20 had to comply with?
 21 A. As I said before, snagging inspections.
 22 Q. Snagging inspections?
 23 A. Yes.
 24 Q. Yes.
 25 A. As I say, it's also parties -- as I say, call it

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1 supervision/managing, but if I see anything wrong, then
 2 I would note it and tell them not to do it --
 3 Q. Yes.
 4 A. -- or make them change it.
 5 Q. Were you aware of any written policies or procedures
 6 which reflected these 9001 project management systems?
 7 A. Sorry, I don't understand how you mean or what you mean.
 8 Q. Were you given any written policies or procedures about
 9 project management systems?
 10 A. A lot of it is on the RMS, so that is almost like our
 11 project management system, I think, as you say. I do
 12 know my way round that. So I would go through it and
 13 that would give us the processes and the various forms
 14 that I would need to use to fulfil my duties.
 15 Q. So you would have specifically looked at policies and
 16 procedures on that RMS, would you?
 17 A. Not all of them, no, not all the words, but I knew how
 18 to operate within the RMS or how the RMS system worked.
 19 But a lot of the time, as I say, looking for a snag
 20 sheet, we have a standard snagging inspection sheet.
 21 Q. Yes.
 22 A. I know where to find that.
 23 Q. Yes. I understand about the snagging process and the
 24 inspection sheet, we will look at that.
 25 A. Okay.

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1 Q. Were you aware of anything else that you had to be doing
 2 on site to comply with that project management system?
 3 A. Sorry, I don't -- in what respect?
 4 Q. I understand you're --
 5 A. Okay, I am familiar with our RMS system, yes.
 6 Q. Okay.
 7 Can we look at paragraph 86 of your statement now,
 8 {RYD00094213/19}. I just want to look at the first
 9 sentence. You say:
 10 "I was involved in the snagging, inspection and
 11 handover of all of the exterior of the building."
 12 Do you see that there?
 13 A. Yeah.
 14 Q. Now, by the time you came on board, Grenfell was between
 15 60 and 70% complete.
 16 A. Yeah.
 17 Q. We've seen that.
 18 Who was responsible for doing the snagging,
 19 inspection and handover of the exterior of the building
 20 prior to you coming on to site?
 21 A. I'm not sure who was -- I knew -- I think it was
 22 Danny Osgood was -- or looked after it for a while, but
 23 I don't know all the people who --
 24 Q. So you didn't take over from somebody performing that
 25 role?

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1 A. Not specifically, no.
 2 Q. So did you feel at the time that it was a new role that
 3 you were performing to be carrying out the snagging?
 4 A. No, I saw it more as managing the Harley, so managing --
 5 as I say, external manager, I would class it as.
 6 Q. Yes.
 7 Now, in the paragraphs that follow, you have
 8 explained stage by stage what the snagging inspection
 9 and handover of the exterior would look like.
 10 A. Yeah.
 11 Q. You have explained the process. And what I'm going to
 12 do is take you through that step by step and ask you
 13 some questions about it over the course of quite a few
 14 questions. So we will keep coming back to look at this
 15 part of your statement --
 16 A. Okay.
 17 Q. -- as we go through the process that you followed.
 18 Just focusing, then, on step 1 to start with at
 19 paragraph 86.1, you say there:
 20 "I initially took John Hoban, Jon White and Ben
 21 Bailey up the mast climbers on the 11th November 2015 to
 22 discuss what they required to see. We went up the west
 23 and north elevations. At the time we went up, the works
 24 were nearing completion but there were a number of
 25 panels not fitted yet, giving them an opportunity to

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1 look at the fitting of the rails, insulation and fire
 2 breaks. They had a couple of minor concerns about
 3 scratches and scuffs to the cladding panels. We also
 4 discussed the process of striking the mast climbers and
 5 making good the cladding where the mast climber struts
 6 were fixed to the building."
 7 A. Yes.
 8 Q. Do you see that there?
 9 So I just want to ask you a few questions.
 10 So this was, if we go back to the previous page, on
 11 11 November 2015 where you took them up.
 12 Now, was that the first occasion since you had
 13 commenced working on site that you had inspected the
 14 cladding yourself?
 15 A. No, it wasn't the first time I had been up the mast
 16 climbers.
 17 Q. Were you aware that there had been a Building Control
 18 inspection in May 2015 prior to this?
 19 A. Yes, I had been told that Building Control had been up
 20 the mast climbers prior to my starting on the project.
 21 Q. Were you told anything about what had occurred on that
 22 Building Control visit?
 23 A. Only that there were no issues, he had flagged no
 24 concerns.
 25 Q. Right.

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1 So how much previous inspection had you done prior
2 to this 11 November 2015 visit?
3 A. I had been up and looked at it a lot and, as I say, it
4 was me getting to know what was on the building as well,
5 and essentially, as I said, it had already been started,
6 so we say two-thirds of it was already up there.
7 Q. Yes.
8 A. But what I understood my role was to make sure that
9 a similar standard was done.
10 Q. Yes.
11 A. If the client, if the clerk of works and
12 Building Control were happy with the standard that was
13 up there, to hand over the building and to get it sort
14 of passed at the end, I would need to maintain that
15 standard.
16 Q. Yes.
17 Can you remember which areas you inspected? Did you
18 go up all four façades?
19 A. I inspect -- I wouldn't say I was inspecting it; I was
20 going up there, I was talking to the things, I was also
21 just familiarising myself. Sometimes it was
22 specifically you would go up there with -- to sort of
23 answer a query from Taff or Bez about -- yeah, and it
24 was just, as I say, it was for me understanding the
25 processes and everything else and just know what they

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1 needed off me as well.
2 Q. Yes.
3 A. And if there had been any issues that I thought -- or
4 areas that I thought were issues.
5 Q. You said it's not an inspection, but did you go and look
6 from the outside and the inside?
7 A. No.
8 Q. No.
9 A. At the time I never went into the flats, until sort of
10 quite late in the project.
11 Q. Yes, so you were just going up on the --
12 A. Yeah, I was, as I said --
13 Q. -- exterior?
14 A. As I said, my role at the start was to do the cladding,
15 so ...
16 Q. Did you identify any defects or issues with the cladding
17 prior to this Building Control visit?
18 A. No, not with the cladding, but I go back to what I told
19 you earlier: one thing I did notice, that the gaps --
20 the joins on the insulation boards weren't taped.
21 I asked Taff and Bez this question and they said that
22 they didn't need to, and that's when I went back and
23 referred to the Celotex -- or had a look at the Celotex
24 brochure to see if I could see anywhere specifically it
25 said that the joins had to be taped. And I'm talking

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1 about the joins between insulation boards.
2 Q. Yes.
3 A. It was noticeable that the join from where the
4 insulation board went to the cavity barrier, that wasn't
5 taped.
6 Q. Right.
7 A. So I asked why sort of the joins in the insulation --
8 Q. What did you -- sorry, carry on.
9 A. I asked why the joins in the insulation board weren't
10 taped, and they said they didn't need to be.
11 Q. When you went and looked at the Celotex --
12 A. Yeah.
13 Q. -- datasheet, what did that tell you about whether joins
14 needed to be taped?
15 A. I could see nothing on there anywhere that said it
16 needed to be taped. So where I taped -- I mean,
17 a silver foil tape, so it would look similar to -- it's
18 like a silver -- adhesive silver foil tape.
19 Q. Did you notice that the edges weren't ever taped?
20 A. I did notice that, yes.
21 Q. Was that something you checked as well?
22 A. Yes, I did check that.
23 Q. And what did you conclude from checking?
24 A. I concluded that there was no need to do it.
25 Q. Right.

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1 Now, had you identified any issues with the cavity
2 barriers prior to that visit on 11 November 2015?
3 A. No.
4 Q. Did you keep any record of what you had seen on site up
5 to that point?
6 A. No.
7 Q. Now, you say at paragraph 61.2 of your statement, if we
8 just look at that, this is on page 13 {RYD00094213/13},
9 you say there:
10 "I requested that John Hoban visit site to inspect
11 the cladding on 11th November 2015 to discuss what he
12 required to see to sign it off."
13 Do you see that there?
14 A. Yes.
15 Q. So this was a visit at your request --
16 A. Yes.
17 Q. -- is that right, not at theirs?
18 A. Yeah.
19 Q. Was that the pattern that was then followed with
20 Building Control visits? Were they at your request or
21 their request?
22 A. Mostly at my request.
23 Q. In your experience, was it usual for you to have to take
24 the initiative of arranging the site visits by
25 Building Control?

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1 A. Yes, because I would be telling him that it was ready to
 2 inspect. It was finished and I needed him to go up
 3 there and say essentially, "Yes, I'm happy". Because,
 4 at the height of it, I needed to know that he was happy
 5 with it so I could start to strike the mast climbers.
 6 Because the worst thing would be that he said he wasn't
 7 happy with it and we had to start putting them back up.
 8 Q. Yes.
 9 Now, just looking at a document, if we can go to
 10 {RYD00056059}, this is an email that you send to
 11 John Hoban on 30 October 2015, so not long after your
 12 arrival, about ten days after you started work on site,
 13 and you say:
 14 "Hi John
 15 "Thanks for calling me back today.
 16 "As discussed, it would be great if you could make a
 17 site visit on Tuesday afternoon whilst my director,
 18 Steve Blake, is on site. I'd like Steve to be involved
 19 in our chat about the outstanding structural information
 20 you require off us to satisfy building control, so we
 21 can achieve final sign off."
 22 A. Yeah.
 23 Q. Do you see that there?
 24 A. Yes, I do.
 25 Q. So is it right that this email followed a call that you

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1 had had with John Hoban?
 2 A. Yes, it did.
 3 Q. During that call, is it right that you talked about
 4 outstanding structural information which
 5 Building Control required?
 6 A. Yes, because, as I say, it was something Steve asked me
 7 to do, was to make contact with him, as part of my sort
 8 of job, and to just ask him if there was anything
 9 outstanding. Obviously me and Steve were picking up
 10 from where Simon and Simon had left off, so it was if
 11 there was any information he needed. This was --
 12 Q. And what exactly -- sorry?
 13 A. -- essentially the start of the process of handing the
 14 building over.
 15 Q. What exactly did he say? What was the outstanding
 16 structural information?
 17 A. That he hadn't received the structural calculations and
 18 he needed them.
 19 Q. Were you surprised at that, that this is your first
 20 contact with the Building Control officer and you find
 21 that he's not yet had all the necessary structural
 22 information?
 23 A. No, at the time I didn't feel surprised by it.
 24 Q. Wasn't this a bit late in the day to be considering
 25 something so fundamental as the structural calculations?

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1 A. You could say, but I don't know if he had had it and
 2 just hadn't reviewed it and didn't know where it was.
 3 I just -- he -- as I say, very similar to what I always
 4 do, ask them if there's anything they need off me.
 5 Q. But this didn't strike you as unusual or --
 6 A. No.
 7 Q. -- concerning?
 8 A. Unfortunately it didn't, no.
 9 Q. Do you agree that Rydon, in its co-ordination role,
 10 should have sent those calculations to the
 11 Building Control officer by that time?
 12 A. From my understanding, Studio E were the ones sort of
 13 managing the Building Control process, so it would be
 14 something that they would have sent to him.
 15 Q. So you would have expected them to have sent that --
 16 A. Yes.
 17 Q. -- by that time?
 18 A. I knew that Studio E were managing the Building Control
 19 process or Building Regulations process.
 20 Q. Did it give you any cause for concern that the project
 21 might thus far not be being run in an orderly way?
 22 A. No.
 23 Q. When you sent this email to John Hoban, asking him to
 24 make the site visit the following week, did you know
 25 that Mr Hoban's previous site visit had been on

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1 15 August 2015, and that that visit was only the second
 2 visit that he had made since the beginning of the year?
 3 A. No, I did not know that.
 4 Q. Was there ever any discussion at any stage on site
 5 amongst the Rydon team about the lack of attendance by
 6 Mr Hoban on site?
 7 A. No, like I said earlier, I had been told that
 8 Building Control had been to site a number of times as
 9 and when necessary, and was fine with the work so far.
 10 Q. Yes.
 11 Was the frequency of site visits by Building Control
 12 on the project in line with your previous experience on
 13 other projects?
 14 A. No, I would expect Building Control to appear at least
 15 on a monthly basis, I thought they're called frequency
 16 visits.
 17 Q. Yes.
 18 A. Normally if you haven't called them in for something to
 19 inspect something, then they will turn up on a frequency
 20 visit.
 21 Q. Yes.
 22 Did you ever ask RBKC Building Control about that
 23 and say, "I would normally expect you to be here
 24 monthly"?
 25 A. No, as I said, I wasn't aware that it had been so

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1 infrequent.
 2 Q. Now, if we can look at Rydon's progress report going
 3 through to mid-November, {RYD00057876}. This is Rydon's
 4 progress report 17, and we see at the bottom that it's
 5 reporting on progress between 17 October 2015 and
 6 13 November 2015. Do you see that?
 7 A. Yes.
 8 Q. Then if we go to page 5 {RYD00057876/5} of the document,
 9 it shows the progress of the façade works, and what it
 10 says there is initially grid work, insulation and
 11 windows is 97% complete. Do you see that there?
 12 A. Yes.
 13 Q. Then the façade cladding panels, 85% complete, and it
 14 says west elevation due to be snagged, you can see that
 15 for both those, and then it also says the crown detail
 16 was 100% complete all round in the box below. Do you
 17 see that there?
 18 A. Yes, I do.
 19 Q. Now, during your inspection with John Hoban and
 20 Jon White on 11 November, you have said in your
 21 statement that you went up the west and north
 22 elevations, we looked at that before; can you remember
 23 which levels on these elevations did you inspect? How
 24 high up did you go?
 25 A. We would have gone to the top.

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1 Q. Yes. And would you systemically inspect every level?
 2 How would it work?
 3 A. When we did the inspection with them -- sorry, I'm
 4 getting confused which one I'm talking about here. Is
 5 this the first --
 6 Q. This is the 11 November one.
 7 A. -- or the second one?
 8 Q. The first one.
 9 A. The first one?
 10 Q. The 11 November --
 11 A. We went to the top and worked our way down.
 12 Q. Yes. Would you have done that for both the west and the
 13 north face for all the levels?
 14 A. Yes.
 15 Q. Yes.
 16 A. As far as I remember, we went right to the top of both
 17 mast climbers.
 18 Q. You also said in that part of your statement that there
 19 were a number of panels not fitted yet --
 20 A. Yes.
 21 Q. -- at that point. Can you remember where those were?
 22 Were they in a particular bit of the building?
 23 A. No, I can't.
 24 Q. Would you agree that on this occasion John Hoban and
 25 Jon White would only see a small area of the insulation

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1 and cavity barriers on this visit --
 2 A. Yes.
 3 Q. -- ie those without panels fitted yet?
 4 A. Yes.
 5 Q. Was there ever an inspection from the inside as well?
 6 A. As far as I'm aware, not at that point.
 7 Q. Yes.
 8 Can you recall whether John Hoban would have seen
 9 any branding on the insulation to show that it was
 10 Celotex?
 11 A. As I said, there was quite a few unbranded boards, but
 12 I don't remember.
 13 Q. Yes.
 14 Do you ever remember discussing the type of
 15 insulation with --
 16 A. No, I don't.
 17 Q. -- John Hoban?
 18 Was any K15 installed at that point in the area you
 19 looked at?
 20 A. I don't remember seeing it.
 21 Q. No.
 22 A. I would like to say I would have noted it if I did,
 23 but ...
 24 Q. Did Mr Hoban inspect the cavity barriers at that time?
 25 A. That's why I took him up there at that point, because

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1 from my point of view, trying to hand the building over,
 2 if I had presented it to him completely finished and he
 3 had, "I've never seen the cavity barriers", then I'd
 4 have to stop that inspection, take some off so he could
 5 see them. So the idea was to take him up there so he
 6 could see parts of the building which were still in
 7 progress so he could see the cavity barriers and the
 8 insulation behind.
 9 Q. Yes.
 10 A. That was part of that first inspection to make sure
 11 that, yeah, we wouldn't have to take any steps
 12 backwards.
 13 Q. Can you recall whether he would have seen both vertical
 14 and horizontal cavity barriers during that inspection?
 15 A. Certainly horizontal. I can't confirm vertical.
 16 Q. Yes. What about the area around the windows without
 17 cladding panels installed? Would he have seen some
 18 windows without the ACM panels kind of boxed around the
 19 windows?
 20 A. Trying to remember now, I don't know.
 21 Q. Yes.
 22 A. I think possibly he ... where the windows butted up to
 23 the columns, that was -- the columns were one of the
 24 last panels to go on, so they concentrated on the
 25 bits -- the flat bits between the windows first and the

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1 columns were one of the last pieces to go on. So
 2 I can't confirm, but I would say that possibly.
 3 Q. Yes.
 4 Did Mr Hoban raise any concerns during his --
 5 A. No, as I said, from the emails you have seen, the main
 6 concern was to do with scratches on the panels and the
 7 performance in terms of longevity at the panels.
 8 Q. I appreciate you say that was the main concern. Were
 9 there any others you can recall?
 10 A. No, otherwise I probably would have noted it and me and
 11 Ben would have -- I would have asked Ben for
 12 confirmation.
 13 Q. Let's just go back to your witness statement where you
 14 are explaining what the process was that was followed.
 15 If we can go back to page 20 {RYD00094213/20} of your
 16 main statement, and look at the next part of what you
 17 say. You say there then:
 18 "Harleys would snag their own work prior to offering
 19 it to Rydon. Ben Bailey did the snagging and sent the
 20 sheets to me. I did one of the pre-handover snags of
 21 the finished exterior on the north elevation as
 22 Ben Bailey could not make it to site."
 23 Do you see that there?
 24 A. Yes, I do.
 25 Q. Now, I just want to look at what Ben Bailey has said

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1 about Harley's own process of inspection before the
 2 cladding panels were fitted. If we go to
 3 {HAR00010060/4}, this is paragraph 13 of his statement.
 4 I'm going to take you to several bits of this, but
 5 I think it would be helpful, and in fairness to you, for
 6 you just to read this paragraph to yourself just for
 7 a moment.
 8 A. Okay.
 9 Q. It goes over the page {HAR00010060/5}, so signal when
 10 you have got to the end of the page.
 11 (Pause)
 12 A. Okay, I've got to the bottom.
 13 Q. Yes.
 14 (Pause)
 15 A. Okay, I've read it.
 16 Q. So if we just go back to that first part of the
 17 paragraph {HAR00010060/4}, and picking up four lines
 18 down, you say:
 19 "I remember that before the panels were installed
 20 I went up the mast climber and conducted a visual check
 21 of the windows, the insulation, the cavity barriers and
 22 the cladding rails in most areas over each level of
 23 existing flats in the building ..."
 24 Then he says:
 25 "I recall doing this on the North, East and West

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1 elevations (not the South - over the main entrance)
 2 before Building Control inspection visits at the request
 3 of Rydon to check the work was ready to be inspected."
 4 Do you see that there?
 5 A. Yes, I do.
 6 Q. So he's saying that, at Rydon's request, Harley would
 7 inspect the insulation, cavity barriers and cladding
 8 rails before the Building Control check. Is that your
 9 understanding of what happened?
 10 A. Yes, that's what should happen, subcontractors should
 11 inspect their own work and they should give us
 12 confirmation that it is ready for us to inspect it as
 13 well.
 14 Q. Yes.
 15 A. So, yeah, first and foremost they have a responsibility
 16 to ensure that their own work is up to standard and
 17 complies with the plans and specification.
 18 Q. Yes. Then over the page {HAR00010060/5}, once he has
 19 explained what that check would involve, he says:
 20 "I then took Building Control up to see the work."
 21 Do you see that there?
 22 A. Yes.
 23 Q. In the second-to-last sentence he also talks about
 24 Building Control, taking them up to see what was
 25 installed.

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1 Was that your understanding? He talks there about
 2 Building Control going up to see what had been installed
 3 prior to the cladding panels being installed; was your
 4 understanding that Building Control would be taken up
 5 before the panels were inspected?
 6 A. I don't know whether he's getting confused with
 7 Building Control and the clerk of works here. From my
 8 statement, from what I remember, we only went up twice
 9 with Building Control up the mast climbers, and those
 10 are the ones I said in my statement. So I took them up
 11 once when there were still some unfinished panels, and
 12 I took them up once with the clerk of works at the same
 13 time to do what I would consider to be a handover
 14 inspection.
 15 Q. Yes.
 16 A. But the clerk of works went up more often than
 17 Building Control did.
 18 Q. Yes.
 19 Is it right that Rydon itself wouldn't
 20 systematically check the insulation, cavity barriers and
 21 cladding rails before the Building Control check?
 22 A. As I said to you earlier, I wouldn't necessarily check,
 23 I have no records of me checking, but it's making sure
 24 on visual checks that I was going up there and the
 25 standard had been set and maintaining the same standard.

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1 So nothing, in all my times I went up there, did I see
 2 anything which dropped below that standard.
 3 Q. Yes, and how often were you going up there?
 4 A. Very hard to say. When I first started up there, I went
 5 up there quite often, getting to know them, getting to
 6 know to trust the installers that the standard was being
 7 maintained.
 8 A little bit towards the end, I started going up
 9 there less and less. I was taking more
 10 responsibilities. I also trusted that they were doing
 11 things correctly. So towards the end, it more came up
 12 I started to go up there when there were specific issues
 13 with how to install the panels safely.
 14 Q. Yes.
 15 A. So we had a couple of issues with mast climbers stopping
 16 panels being fitted easily and safely, and I started to
 17 go up there more often. That was a lot more on the
 18 south elevation.
 19 Q. Right, yes.
 20 Just to be clear, did you ever see it as part of
 21 your role to be going up and checking prior to
 22 Building Control coming on site and satisfying yourself
 23 that the cladding rails, the cavity barriers and the
 24 insulation had been installed correctly?
 25 A. I would satisfy myself that the standard was similar to

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1 what was already been up there and, as far as I was
 2 aware, was the standard that Building Control -- or, no,
 3 not Building Control, more the clerk of works at that
 4 time, was happy with.
 5 Q. Yes.
 6 A. So in terms of formal inspection, no, but every time
 7 I went up there, I was looking to make sure that it was
 8 the standard that was acceptable.
 9 Q. But in terms of formal inspection, was it your
 10 understanding that Harley was doing that itself --
 11 A. Yes.
 12 Q. -- in relation to its own work?
 13 A. Yeah, they have a responsibility to make sure their own
 14 work is to the plans and specification --
 15 Q. Yes.
 16 A. -- and the standard required.
 17 Q. What about after the Building Control visit? Would you
 18 or anyone else at Rydon ever do a formal check after
 19 that?
 20 A. Well, Building Control, same with any inspection, is --
 21 if they raise any snags or any concerns, then you have
 22 to go back up afterwards, or once that work has been
 23 remedied, rectified, you have to go back up there and
 24 get that work signed off before you could take the
 25 mast climbers down.

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1 Q. But that would only be if Building Control flagged
 2 anything; is that right?
 3 A. Yeah, Building Control, and very similar process for the
 4 clerk of works as well.
 5 Q. Yes.
 6 A. That to me is what I would call a client inspection, the
 7 clerk of works. Client inspection, Building Control
 8 inspection, we pretty much did that the same time on the
 9 first couple of mast climbers.
 10 Q. Yes.
 11 Now, Ben Bailey states -- and we saw that in his
 12 statement at paragraph 13 {HAR00010060/4} -- that there
 13 was no checklist or specification to inspect the areas
 14 against when Harley was checking its own work prior to
 15 these Building Control inspections. Do you agree with
 16 that?
 17 A. Not that I saw a checklist, but the snag list he gave to
 18 me to sort of say -- well, his inspection sheet he gave
 19 to me had things like EPM, cladding rails, so as far as
 20 I'm concerned, he'd given it to me saying they had done
 21 everything accordingly.
 22 Q. But Rydon didn't provide Harley with a checklist or a --
 23 A. No.
 24 Q. -- list of things that needed to be checked --
 25 A. No.

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1 Q. -- before Building Control would come on?
 2 A. No.
 3 Q. Given that you were relying -- I mean, do you accept you
 4 were relying to a significant extent on the Harley
 5 checks, the Harley inspections, before Building Control
 6 came along?
 7 A. Yes, I do, because they designed the system as well.
 8 Q. Yes.
 9 A. So ...
 10 Q. Given that you are relying to a significant extent on
 11 Harley's own inspections of the works, wouldn't it have
 12 been sensible for you to have provided Harley with some
 13 criteria for the inspections to carry out?
 14 A. You could say that, yes, but you could say that the
 15 drawings are the criteria, plans and specifications are
 16 the criteria that they have to build to.
 17 Q. Just check against all of the drawings.
 18 A. Yeah.
 19 Q. So, for example, for the cavity barriers, you didn't
 20 think of ever providing a specific list of things that
 21 it was important to check about the cavity barriers when
 22 these inspections were being carried out?
 23 A. No, but visually I was looking that they were in the
 24 right place, so they were horizontally and vertically;
 25 that they were clipped, very much like what Ben says,

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1 where they were clipped and the clips were turned out so
 2 they were held securely in place; and that they were
 3 taped against the insulation, and then all my checks, in
 4 all my times I went up there, I never saw anything which
 5 said that they weren't.

6 Q. Were you confident at the time that Harley were
 7 comprehensively and systematically checking the windows,
 8 the insulation and the cavity barriers before the --

9 A. Yes, I believed they were competent. As I say, in my
 10 assessment of them, which I get in the first couple of
 11 weeks sort of dealing with them, and the work I had
 12 seen, I assessed they were competent and they were doing
 13 it right.

14 Q. We saw in Ben Bailey's witness statement, back on the
 15 previous part of paragraph 13 {HAR00010060/4}, where he
 16 says in the middle of that paragraph that he recalls
 17 doing the checks that he did on the north, east and west
 18 elevations but not the south before Building Control
 19 inspection visits at the request of Rydon. Do you see
 20 that there?

21 A. Yes, I do.

22 Q. Were you aware that the south elevation had not been
 23 inspected by Harley?

24 A. I think I talk about it in my statement, where Ben
 25 didn't turn up on time. Very much similar to -- I'm

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1 trying to explain is -- I would expect Harleys to give
 2 me some sheets saying that they had done their work
 3 properly and that they had fitted it in accordance with
 4 the plans and specifications. I then go up and check
 5 that I'm happy with that, and I then would say to
 6 Building Control and the clerk of works, "I'm happy,
 7 I have gone up there and had a look at it, so please can
 8 you come up and have a look at it".

9 So I think the one he is talking about on the south
 10 is the one that I say that I had done essentially you
 11 could say his job, I went up and checked it before he
 12 did, because I was -- as I say, I wanted to get the
 13 things done, I wanted to get Building Control and the
 14 clerk of works up there so I could start the process of
 15 striking the mast climbers. So that's what I think he's
 16 talking about, the same thing I talk about, where I went
 17 up and did one of their inspections for them.

18 Q. Was that of the whole of the south elevation?

19 A. That would be basically a finished elevation, so all the
 20 panels up there.

21 Q. I know you say finished, what I'm trying to get at is
 22 the inspections that occur before the panels go on, so
 23 of the cavity barriers, the insulation, et cetera.

24 A. Yeah.

25 Q. Do you remember doing that for the south elevation?

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1 A. Not -- as I said, specifically not a formal inspection,
 2 but it was done part of my trips up there, and certainly
 3 in the south elevation I went up there quite a few times
 4 because there was an issue where the mast climbers were
 5 stopping us fitting the panels safely. So we had to do
 6 some alterations to the mast climbers to be able to fit
 7 the panels safely.

8 Q. Right. Just to be absolutely clear about my question,
 9 you don't recall doing a formal inspection of the south
 10 elevation in terms of what was underneath the panels?

11 A. No. No.

12 Q. Now, at paragraph 52 of Mr Bailey's witness statement,
 13 I want to show you that as well, this is at
 14 {HAR00010060/15}, he says --

15 SIR MARTIN MOORE-BICK: Sorry, Ms Grange. Give me a moment
 16 here.

17 I think everyone is getting a bit sort of carried
 18 away and moving quite quickly, and I think the shorthand
 19 writer is having trouble keeping up, that's all.

20 MS GRANGE: Let's both try and speak more slowly?

21 A. Okay, I'll speak slower.

22 Q. I'm just as much at fault as you are, but yes.
 23 So here it's said:
 24 "I was never provided with the criteria for either
 25 Building Control inspections or those of the Clerk of

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1 Works, nor was I issued with any reports they produced."
 2 Do you see that there?

3 A. Yes.

4 Q. Bottom of the page, paragraph 52.

5 A. Yeah.

6 Q. He says:
 7 "I assumed however that both Building Control and
 8 the Clerk of Works would be checking cavity barriers,
 9 both their location and quality of installation."

10 Do you see that?

11 A. Yes.

12 Q. Do you agree that Harley were never provided with any
 13 criteria for either the Building Control inspections or
 14 those of the clerk of works?

15 A. In terms of criteria, yes, I agree, they weren't
 16 specifically said we were looking at that, but Harleys
 17 had responsibility -- design responsibility, so they
 18 knew that building and what should have gone on there
 19 better than anyone. They designed the system which went
 20 on the building, so ... but, sorry ...

21 (Pause)

22 I don't -- as I say, Building Control never gave us
 23 any inspection sheet. He went up and it was these
 24 panels. We went up with Building Control and the clerk
 25 at the same time on the first two mast towers that

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1 I explained in my statement, and in that respect the
2 clerk of works basically took the notes, because they
3 were talking to themselves at the same time, so we came
4 up with one list which you could say was a definitive
5 clerk of works/Building Control inspection. And Ben
6 came up at the same time. There wasn't that many issues
7 on there, so I don't -- I don't remember giving them
8 a list, but we then went back up with the clerk and
9 checked the bits which were on the list, and they had
10 all been done. That's why -- as I say, I would never
11 have struck the mast climbers without making sure that
12 Building Control and the clerk of works were happy that
13 everything had been done.

14 Q. Yes.

15 Did you ever raise it as a concern within Rydon that
16 you weren't providing subcontractors with criteria for
17 Building Control inspections or inspections by clerk of
18 works?

19 A. No, because it's not something I've ever done before.

20 Q. Yes. Okay.

21 Now, I want to look at this point at an email
22 between two Building Control officers that you wouldn't
23 have seen at the time, but I want to just ask you about
24 it. This is at {RBK00001122}.

25 Now, this is an email from John Hoban to John Allen

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1 within RBKC Building Control, and what it appears to be
2 is John Hoban reporting back to John Allen about what he
3 has done on 12 January 2016. Do you see that there?

4 A. Yes, I do.

5 Q. So we're moving a little bit forward in time here.

6 Under the heading "Grenfell Tower", he says this:

7 "Checking new external cladding to existing tower
8 block, identifying defects (controllable under the
9 building regulations) on new panels, brief introduction
10 on fire breaks/fire cavity barriers, including location
11 of where cavity barriers on cladding panels should be
12 provided for the particular project."

13 Do you see that there?

14 A. Yes, I do.

15 Q. So I think he's reporting back, and I want to ask you
16 about, in particular, this brief introduction he talks
17 about:

18 "... brief introduction on fire breaks/fire cavity
19 barriers, including location of where cavity barriers on
20 cladding panels should be provided for the particular
21 project."

22 Do you know who gave Mr Hoban that introduction
23 about that topic?

24 A. No. Is it possible to see my statement around that
25 time? Because I'm getting a bit confused with visits.

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1 Q. Yes. I'll find the reference for you in just a moment.
2 Yes, I'll take you back to that.

3 A. As I say, I don't remember -- I remember the ones before
4 Christmas, but without reading my statement again
5 specifically, I need to see what I did after Christmas
6 with John.

7 Q. Right, okay.

8 Do you yourself have any memory of giving Mr Hoban
9 an introduction to, for example, the location of where
10 cavity barriers would be?

11 A. I don't understand why he calls it an introduction when
12 we had already been up the tower before Christmas and
13 looked at it.

14 Q. Yes.

15 Do you ever remember, even prior to this, talking to
16 Mr Hoban about where cavity barriers were to be placed
17 in the system?

18 A. Specifically, no, I don't remember a conversation in
19 that respect.

20 Q. So, yes, I think you mentioned this visit at 61.5 of
21 your witness statement. Let's go to that. This is
22 page 14 {RYD00094213/14} of your main statement. You
23 say:

24 "I arranged for John Hoban to visit site on 12th
25 January 2016 at 9am to go up the mast climbers again.

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1 I followed up the meeting with an email confirming a
2 conversation about fire stopping to penetrations through
3 walls and floors. We didn't strike any of the mast
4 climbers until each elevation from the 4th to 23rd floor
5 had been approved by the Clerk of Works, Jon White."

6 Do you see that there?

7 A. Yes, I do.

8 Q. Now, I'm going to come back to that follow-up about
9 firestopping and penetrations, because I want to take
10 you to some documents on that.

11 A. Okay.

12 Q. You don't mention any discussion there about cavity
13 barriers, so, I mean, I think we can take it from your
14 evidence that you don't think you briefed Mr Hoban about
15 that?

16 A. No, but I believe, and I've not stated there, that
17 Ben Bailey would have come up with me, or it might have
18 been -- we would always have gone up with one of the
19 installers as well. We always had to have one of the
20 installers driving the mast climbers. So I wasn't
21 qualified and hadn't been trained to drive the
22 mast climber, so every time I went up, it would be with
23 someone from Harleys or from the installers.

24 Q. Yes.

25 Were you aware at the time of this visit, and indeed

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1 on your first visit on 11 November 2015, that the design
 2 didn't provide for cavity barriers around the windows?
 3 A. No.
 4 Q. You weren't aware of that?
 5 A. Well, I was aware that it wasn't on the drawings.
 6 Q. Yes.
 7 A. So -- but I didn't -- wasn't aware of a need to put them
 8 on a cladding system like that. But I knew -- as I say,
 9 I know from the drawings they weren't shown, so ...
 10 Q. Did you notice that when you were looking at the
 11 drawings? Did you say to yourself, "Oh, I note we
 12 haven't got cavity barriers around the windows", did
 13 that strike you at all?
 14 A. No, it did not strike me.
 15 Q. Did you ever discuss that, the lack of cavity barriers
 16 round the windows, with anyone else at Rydon?
 17 A. No.
 18 Q. Or with anyone else at Harley?
 19 A. I don't remember any conversations like that.
 20 Q. Or with Studio E?
 21 A. No.
 22 Q. What about with Building Control? Did you ever have any
 23 conversations with Building Control about there being no
 24 cavity barriers around the windows?
 25 A. No. As I said before, I never had any conversations

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1 with anyone about it because, as far as I was concerned,
 2 it was in accordance with the drawings, so ...
 3 Q. Did you know that there was a difference between the
 4 horizontal cavity barriers that had been specified on
 5 the project and the vertical cavity barriers that had
 6 been specified?
 7 A. Yes.
 8 Q. Can you describe what the difference was for us?
 9 A. To me the difference was the horizontal ones sat back
 10 about 25 millimetres from the back of the cladding panel
 11 to allow for vertical ventilation, the horizontal -- or,
 12 sorry, the vertical cavity barriers should have butted
 13 up to the back of the panel, because there was no need
 14 for horizontal ventilation. It was all about vertical
 15 ventilation.
 16 Q. Were you aware that the horizontal had an intumescent
 17 strip that would activate to close the cavity --
 18 A. Yes.
 19 Q. -- but the vertical was a solid block of material which
 20 wouldn't intumesce?
 21 A. Yes.
 22 Q. Did you ever check the vertical cavity barriers on site,
 23 do you remember?
 24 A. Not specifically, no.
 25 Q. And do you ever remember showing Building Control the

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1 vertical cavity barriers on site?
 2 A. I -- well, as I said, I don't remember if they were
 3 visible when I took Building Control up, so no, I don't
 4 specifically remember.
 5 Q. Did you ever see any examples of horizontal cavity
 6 barriers fitted in the vertical position?
 7 A. No.
 8 Q. Can we just look at a photograph on this. This is from
 9 Dr Lane's Phase 1 report, this is {BLAS0000008/48}.
 10 I want to look -- this is figure 8.52, and we can see
 11 this is the cavity barrier labelled RH25, and it's
 12 installed in the vertical orientation, isn't it?
 13 A. Yes.
 14 Q. Can you see that? Am I right that the green strip would
 15 be where the intumescent strip was?
 16 A. I believe you're right, yes.
 17 Q. So that's also been installed with the intumescent strip
 18 facing into the concrete, into the building.
 19 A. Yes.
 20 Q. Did you ever notice workmanship like that on site, with
 21 them being installed horizontal in the vertical position
 22 or indeed with the intumescent strip facing the wrong
 23 way?
 24 A. No.
 25 Q. If you had seen cavity barriers installed in that way,

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1 what would you have done about it?
 2 A. I would have asked them -- well, I hope I would have
 3 asked them to change it and make it right.
 4 Q. Yes.
 5 Can you explain why this might have been found
 6 on site?
 7 A. I can't explain, no.
 8 Q. Could it be, perhaps, because there wasn't a regular and
 9 systematic inspection of the cavity barrier
 10 installation?
 11 A. It could be.
 12 Q. Now, just sticking generally with the topic of
 13 inspections, but I want to ask about the insulation.
 14 Can we go to {RBK00052478}. This is a document which
 15 records some of the site notes made by RBKC
 16 Building Control, and what I want to do is go to page 3
 17 {RBK00052478/3} and look in the middle of the page.
 18 These are notes from a site visit carried out by
 19 John Allen of RBKC Building Control on 24 March 2016.
 20 Do you see that there?
 21 A. Yes.
 22 Q. Do you remember a visit where you had Mr Allen instead
 23 of Mr Hoban?
 24 A. Yes, I do.
 25 Q. I think you mention it --

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1 A. I asked for John to come in -- sorry, I asked for
 2 John Hoban to attend site and then John Allen turned up.
 3 Q. Yes. I think it's in your witness statement at
 4 paragraph 61.6 {RYD00094213/14} for the transcript.
 5 On the second line down he has put this:
 6 "Ensure thermal insulation completely fills voids."
 7 Do you see that?
 8 A. Yes.
 9 Q. We know that you emailed Ben Bailey of Harley the same
 10 day, on 24 March 2016, if we can look at that. This is
 11 {RYD00072239}. If we look at the top of that page, this
 12 is you to Ben Bailey, and you say:
 13 "I've just had a visit from Building Control and
 14 he's flagged a couple of issues with Harleys' work, as
 15 follows ..."
 16 You have got:
 17 "Ensure thermal insulation completely fills voids -
 18 mainly gaps insulation around columns."
 19 Do you see that there?
 20 A. Yes.
 21 Q. Can you just explain for us what the problem was?
 22 A. I think round the columns some of the boards weren't cut
 23 as neatly as they could do to fill the void or fill
 24 right back to the building, so he had flagged it up.
 25 Q. Do you know whether Mr Allen was made aware of the type

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1 of insulation that was used in this visit?
 2 A. It's not part of the conversation I remember, and this
 3 would apply only to the bottom four floors at this time,
 4 because by this time we had struck all the mast climbers
 5 and we were doing the bottom four floors off
 6 cherry-pickers.
 7 Q. Right.
 8 A. So I didn't take Mr Allen up in a cherry-picker, so it
 9 would have been what he would have seen from the ground.
 10 Q. That makes sense.
 11 We talked about Harley snagging their own work
 12 earlier, and I just want to take you to an example of a
 13 snagging sheet from Harley that they were using at this
 14 time. Can we go to {RYD00059235}. I think this is
 15 an example of a snagging sheet. We can see it says,
 16 "Grenfell Tower - External Handover", then towards the
 17 bottom we can see it was conducted on 25 November 2015
 18 and it says, "Façade handover ... WEST", do you see
 19 above that?
 20 A. Yes.
 21 Q. And checked by Ben Bailey, do you see that there?
 22 A. Yes.
 23 Q. If we can go to page 4 {RYD00059235/4} of the document,
 24 we have got a section for the cladding, and we can see
 25 the snagging comments for the cladding insulation and

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1 cavity barriers?
 2 A. Yes.
 3 Q. Now, I think we've established it before, but when
 4 you -- did you receive these sheets, these snag sheets?
 5 A. Yes, this is exactly what I requested off Ben. This is
 6 proof to me that Harleys are inspecting their work.
 7 Q. On receipt of these sheets, would you ever go and have
 8 a look at the snags he has identified to check that they
 9 had been remedied?
 10 A. I was aware of the snags because I also told Ben that
 11 this was not what I needed, I needed a completed snag
 12 sheet, and he needed to do everything on it and then
 13 give me one which was completed so it would be ready for
 14 me to go and do my inspection, and then also then after
 15 that, following that, take up Building Control and the
 16 clerk of works.
 17 Q. I thought you said earlier that you didn't necessarily
 18 do a formal inspection before Building Control came.
 19 A. It wouldn't be necessarily -- sorry, not necessarily
 20 formal inspection, but if Harleys told me that their
 21 work was complete, I would go up and make sure that it
 22 was complete.
 23 Q. Yes, I see.
 24 A. As I say, they had a duty to finish their work correctly
 25 first.

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1 Q. Did you ever find snags that they had overlooked or
 2 issues that they had overlooked when you went back up?
 3 A. No, but the best -- no, but as I said, I also did one of
 4 their snags at the end, the one on the south, and that
 5 would be an example of things I was looking at and ...
 6 Q. Did you ever have any cause for concern about the
 7 thoroughness of the inspections of Ben Bailey for
 8 Harleys?
 9 A. In terms of -- I had concern that he gave me a sheet
 10 saying it was ready and it wasn't, because it still had
 11 on there two nos, and I'm pretty certain I made this
 12 clear to him in an email once that he needs to be giving
 13 me completed snag sheets so it's ready for me to go up
 14 and have a look.
 15 Q. Yes.
 16 A. In very much the same way that that's what
 17 Building Control and the clerk of works expected off us,
 18 so I would hope, and the way I wanted it to run, that
 19 Harleys would give me a completed snag sheet saying,
 20 "It's all done, we have inspected it and we have carried
 21 out our duties and done everything accordingly", I would
 22 go up there, and by that time I wouldn't expect to see
 23 anything, apart from a couple of little bits. I do
 24 remember pointing out a little bit of black trim or
 25 mastic which needed to be taken off before I took

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1 Building Control up. But they were, by that time, very
 2 minor snags that literally were done with the installer
 3 at the time, because, as I said, I always went up with
 4 an installer in the mast climber.
 5 Q. Yes.
 6 A. And they nearly always had tools in there that I would
 7 come down -- as I say, we would almost snag it as we
 8 came down, just cleaning a little bit here, taking it --
 9 or finishing off bits there.
 10 Q. Yes.
 11 You referred to an email that you sent, can we look
 12 at what I think might be that: {HAR00006955}. This is
 13 an email you sent to Mr Bailey on 24 November 2015.
 14 Now, do you want to just remind yourself, is this
 15 the email you were referring to --
 16 A. Yes.
 17 Q. -- earlier, where you raised a number of snagging issues
 18 with Mr Ben Bailey? Some of them appear to include, if
 19 we look at the second paragraph:
 20 "Snagsheets have been sent to me with items not
 21 closed off - I can't present these to the [clerk of
 22 works] to enable him to start his inspections -
 23 snagsheets need to be completed and signed off before
 24 I receive them.
 25 "Snagsheets need to be amended with references to

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1 photos which aren't there omitted.
 2 "Snagsheets need to be given to Bez & Taff onsite or
 3 electronically - they're the ones doing the work, not
 4 me."
 5 Do you see that there?
 6 So at this point, is it fair to say that you were
 7 not happy with the snagging process that Harley had
 8 adopted?
 9 A. Yes, it is fair to say I wasn't happy.
 10 Q. Were the problems you identified in this email ever
 11 rectified? Did it get better?
 12 A. Yes, I would say it got better.
 13 Q. How quickly did it get better?
 14 A. Well, some of those snags are only sort of half -- well,
 15 minor work -- I would consider those -- they are snags,
 16 they are minor bits of works which need to be finished
 17 off before you can consider that elevation or that part
 18 of the cladding fully finished. So I remember -- as
 19 I say, I believe this was the first one we did and it
 20 was about -- as I say, it was partly me setting the
 21 standard that I expected from Harleys.
 22 Q. Yes.
 23 Now, if we could just look back at paragraph 86.2 of
 24 your statement at page 20 {RYD00094213/20}, and if we go
 25 to the third sentence, you say:

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1 "I did one of the pre-handover snags of the finished
 2 exterior on the north elevation as Ben Bailey could not
 3 make it to site."
 4 Do you see that there?
 5 A. Yes. Yes. I'm trying to think whether --
 6 Q. Do you think that was the north --
 7 A. I think actually now, reading this again, that might be
 8 the south elevation.
 9 Q. Right.
 10 A. I don't remember -- I don't know whether you have
 11 a copy. It was -- I took a copy of a drawing, so the
 12 elevation, and marked on there, I think it was about 15
 13 to 20 points, bits I wasn't happy. I don't know whether
 14 you have a copy of that.
 15 Q. Not instantly, but --
 16 A. No, we could show on there -- I would hope to show that
 17 that was the elevation -- it might say on there what
 18 elevation it was.
 19 Q. Right.
 20 A. But I remember it being the last elevation, which was
 21 the south elevation, so I do believe I might have that
 22 wrong in my statement.
 23 Q. Right, okay.
 24 SIR MARTIN MOORE-BICK: Do you remember whether it was the
 25 elevation that had the entrance to the tower?

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1 A. Yes, it was that one.
 2 MS GRANGE: Yes, which would be the south, yes.
 3 Just moving on to look at the remaining parts of
 4 your inspection process, so step 3 below that, you said:
 5 "I went and viewed all of the finished elevations
 6 before offering those to John Hoban, of RBKC Building
 7 Control, and Jon White, the Clerk of Works."
 8 Did you have any form of method statement for those
 9 inspections?
 10 A. No. No method statement.
 11 Q. Just to be clear, did you have any experience of
 12 inspecting cladding works before you undertook this
 13 task?
 14 A. Only the cladding works that I've stated previously were
 15 in the jobs that I did, but to me at that stage that's
 16 my site manager role, is to inspect and finish finished
 17 areas.
 18 Q. Did you have any training in this aspect of your role?
 19 A. Specific training, no, but 20 years of experience of
 20 what I expected a finished building to look like.
 21 Q. Yes.
 22 A. And that should be in accordance with the plans and
 23 specifications.
 24 Q. Can you just help us as to exactly how you carried out
 25 these final finished elevations inspections?

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1 A. Like I think I explained to you earlier, you could say
2 that I almost, in fairness, was jumping on the back of
3 the Harleys inspections. They were giving me finished
4 products and that's what their inspection sheets were
5 showing, so I would go up the building, but I would do
6 it with an installer, who had a little bucket of tools
7 to finish things off. So by that time -- and we also
8 knew about the cladding panels, any scratches, so
9 I wouldn't expect to see any panels up there with
10 scratches.

11 So I don't think there is -- I have a formal
12 inspection sheet saying I've done it, but what I've done
13 is gone up the building and come back down with
14 an installer, and said, "Right, not quite happy with
15 that little bit", and we just finish it off there and
16 then and come back down. So by the time I got to the
17 bottom, I was happy that those elevations were ready for
18 the clerk of works and Building Control to inspect.

19 Q. Yes.

20 Were you aware at the time that Rydon had a quality
21 control checklist?

22 A. Yes.

23 Q. Can we just have a look at that. It's {RYD00042087}.
24 So this is a, I think, two-page checklist. So if we can
25 see there the first page, you have got to tick if

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1 certain works have been completed to a satisfactory
2 standard. Do you see that there?

3 A. Yes.

4 Q. Then can we just look at page 2 {RYD00042987/2}, so you
5 have got a checklist there which is by room, and the
6 work to be done and de-snag check to be signed and
7 dated, and then who it's to be completed by. Do you see
8 that there?

9 A. Yes, I do.

10 Q. Did you use this checklist for your inspections of the
11 cladding works?

12 A. On this project, no, I didn't. I have used these
13 before. I remember being on the first project that they
14 were brought out in, and the idea behind them was to
15 make sure that the subcontractor was doing their works
16 in accordance. But they also were designed that the
17 subcontractor was to take responsibility for them in
18 some way, so a Harley snag sheet would take precedence
19 over this.

20 Q. Right, I see.

21 Did anyone at Rydon, for example Mr Blake, ever
22 check your work, like check what you were doing in terms
23 of your inspections?

24 A. He asked me whether I was doing my job and going up
25 there and snagging it and doing the bits I was supposed

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1 to, yes.

2 Q. Did Mr Blake or anyone else at Rydon ever inspect the
3 works for themselves?

4 A. No, because I wouldn't expect that to be his role as
5 such, to actually go out on an inspection. I would
6 expect Steve, if he saw something wrong with something
7 I was doing, or anyone, anything anyone was doing, to
8 tell me, and I would go out there and fix it, and he
9 certainly did that in terms of sort of things he saw
10 which possibly you could say were unsafe, he made me go
11 and make sure people were doing things right, but in
12 terms of a formal inspection, no.

13 Q. Did anyone ever raise concerns about the thoroughness of
14 inspections that had been carried out?

15 A. No. I believe we had been quite thorough, making sure
16 that subcontractors are doing their work, and they're
17 giving me sheets telling me they've done it all. Like
18 I say, they have a responsibility to make sure their
19 work is correct in the first place. I go up there,
20 I check, I do not have any sheets proving that
21 I checked, but by the simple fact that when I took
22 Building Control and clerk of works up there, it came
23 back with very minor issues.

24 Q. Yes.

25 If we go back to your step-by-step process that you

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1 have got at paragraph 86.4 on page 20 {RYD00094213/20}
2 of your statement, this is after -- so you have said in
3 86.3 that you have viewed all of the finished elevations
4 before offering them to Building Control and the clerk
5 of works, and then you say:

6 "On the first proper handover inspection John Hoban
7 and Jon White came up together and Jon White did a snag
8 list."

9 Do you see that there?

10 A. Yes.

11 Q. Can you recall when the first proper handover inspection
12 was? We're currently somewhat unclear as to when that
13 might have been.

14 A. That was the second time I took John Hoban up the
15 mast climbers. So in my witness statement, the second
16 time I took him up there was the formal -- I would say
17 the formal inspection. I told him, "We are ready, it is
18 all up there for you, please come and have a look", and,
19 as I think I said earlier, the clerk went up there with
20 Building Control and the clerk was the one who wrote the
21 list, because --

22 Q. So early January 2016, could that be --

23 A. Yes, I believe it was.

24 Q. Was the cladding complete by that stage?

25 A. Yes. Sorry, when I say complete, it was complete from

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1 the 4th floor up to the 23rd floor.
 2 Q. Yes. So taking that 4th floor to the 23rd floor, would
 3 Building Control have had any opportunity at that
 4 inspection to look behind the cladding panels to see the
 5 insulation and cavity barriers, or would that all have
 6 been covered up?
 7 A. On that visit, no, they would not have been able to see
 8 it, but that was the point of the first visit a couple
 9 of weeks prior, to make sure that he could see it. As
 10 I explained to you, the last thing that I wanted on that
 11 handover inspection, the second one we did, was for John
 12 to say, "I've not seen behind it, please take some
 13 panels off so I can see". That's why I took him up the
 14 first time. You could say it was a pre-inspection visit
 15 to make sure that he was happy with the insulation and
 16 the cavity barriers, what he could see at the time.
 17 Q. What did you understand the role of Building Control to
 18 be during their inspections?
 19 A. That if they see anything wrong, they would tell us.
 20 Q. Do you agree that it's not the role of Building Control
 21 to quality control the works carried out by Rydon and
 22 Harley?
 23 A. I don't know semantics of it, but I would always expect
 24 Building Control, if they didn't see the quality was
 25 right, to say something.

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1 Q. Right.
 2 A. Whether you say they have responsibility, I don't
 3 understand that, but I would always expect them, if they
 4 saw something substandard in their opinion, to tell us.
 5 Q. Do you agree that, in a design and build contract, the
 6 contractor can't rely solely on Building Control to
 7 raise issues that it might have missed?
 8 A. Yes, I do agree.
 9 Q. Was that what you were doing in practice? I mean, how
 10 much reliance were you placing on Building Control to
 11 pick up things you might have missed?
 12 A. Me, on, what, these inspections? None.
 13 Q. Yes.
 14 A. I was taking them up there thinking it was completely
 15 finished and hoping that he would say, "Yes, I agree
 16 with you, it is finished and I'm happy, carry on, please
 17 strike the mast climbers".
 18 Q. So did you understand he was, on that "is it finished"
 19 check, looking at any questions of compliance with the
 20 Building Regulations at all, or was it -- what did you
 21 understand him to be looking for on that visit?
 22 A. I thought every visit they do they are looking at
 23 compliance with Building Regulations, that's their role.
 24 Q. Yes.
 25 Now, just moving on to your step 5. 86.4 we have

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1 just discussed:
 2 "On the first proper handover inspection John Hoban
 3 and Jon White came up together and Jon White did a snag
 4 list."
 5 Then you say at 86.5:
 6 "Then Harleys would rectify the snags and Jon White
 7 would inspect again to check they were done. John Hoban
 8 did not want to view the completed snags as they were
 9 mainly scratches."
 10 Do you see that there?
 11 A. Yes.
 12 Q. So did you rely on Jon White to check that the snags had
 13 been rectified?
 14 A. Yes, because that's part of the handover process,
 15 anything on a client inspection sheet, they need to
 16 check that has been done.
 17 Q. Why did Rydon not check for itself as well?
 18 A. We did.
 19 Q. You did?
 20 A. Yes.
 21 Q. When was that?
 22 A. Prior to taking Jon White up there.
 23 Q. I see. So before 86.4, before the first proper handover
 24 inspection, you say you would have checked?
 25 A. Yes. That's how the snagging process works, is, as

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1 I said, for Harleys to do their own snags, they present
 2 it to me, I then check it, I check I'm happy that I can
 3 present it to the people who need to approve our work or
 4 Rydon's work, which is Building Control and the clerk of
 5 works. So then any snags which come out of those two
 6 lists, I then give back to Harleys because it's them
 7 doing the work.
 8 Q. Yes.
 9 A. They rectify the snags. I then check the snags are
 10 done, and then I re -- or I give the finished product
 11 back to -- or, as I say, I asked John Hoban -- or Jon,
 12 sorry -- I'm getting confused with Johns here --
 13 Jon White to come back and inspect that the snags are
 14 done. And as I said before, I would never have struck
 15 those mast climbers unless I knew that I had that
 16 assurance that Jon White was happy that all the snags
 17 had been done.
 18 Q. Yes.
 19 Were you aware of what the obligations were between
 20 the TMO and John Rowan and Partners, the clerk of works?
 21 Were you aware of what they had been contracted to do by
 22 the TMO?
 23 A. Not at all.
 24 Q. So you weren't --
 25 A. Sorry, I knew that they were clerk of works and I would

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1 expect that to be what a clerk of works does. I have
 2 a clerk of works on every job.
 3 Q. Would that expect that to include checking for
 4 compliance with the Building Regulations?
 5 A. I would say it's more checking compliance with the plans
 6 and specifications as per my role is.
 7 Q. Yes.
 8 Now, I just want to look at your witness statement
 9 at paragraph 97, so something you say further on. This
 10 is at {RYD00094213/22}. This is the meeting that you
 11 said you had there. You say:
 12 "I had a meeting on 12th January 2016 with Jon White
 13 and Tony Batty [the clerk of works] which was also
 14 attended by Andrew Malcolm of Artelia and Matt Smith of
 15 Max Fordham. The purpose of this meeting was to go
 16 through the Clerk of Works reports to date and correlate
 17 all of the outstanding issues on to one definitive
 18 list."
 19 Do you see that there?
 20 A. Yes.
 21 Q. Who was that list then provided to, after that list had
 22 been compiled?
 23 A. Well, Andrew Malcolm took or sort of chaired the
 24 meeting, he was the one who provided the minutes
 25 afterwards, with all the items, and then I would have

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1 gone through with the relevant subcontractors to get all
 2 the outstanding items finished. I know quite a few of
 3 them, certainly Tony Batty's items, would have been JSW,
 4 because it would have been M&E snags or bits which were
 5 outstanding.
 6 Q. So were you responsible for resolving the outstanding
 7 issues?
 8 A. I was -- well, responsible for managing the process, ie
 9 telling the subcontractors, "This is still outstanding,
 10 the clerks are not happy with it, please sort it out or
 11 give me the information that they're asking for", then
 12 I would have given it back to the clerks.
 13 Q. Yes.
 14 A. So this meeting -- the idea of this meeting was -- it
 15 was all part of the handover process. The clerks were
 16 never going to sign off a building unless everything had
 17 been done and all their reports, including the ones
 18 prior to my involvement. So this was a meeting to go
 19 through all of the reports prior to my involvement, get
 20 all the outstanding items on there, items they were
 21 still not happy had been resolved satisfactorily, and
 22 get them all on to one definitive list so then I could
 23 work my way through them and resolve them and rectify
 24 them.
 25 Q. Yes.

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1 A. Or get the responsible parties to do the work.
 2 Q. Now, I want to show you something that Mr Neil Reed of
 3 Artelia has said about that meeting. If we can go to
 4 his witness statement, this is at {ART00006663/15}.
 5 Mr Reed says:
 6 "On 12 January 2016, Andrew Malcolm, my assistant
 7 EA, attended a clerk of the works reports review
 8 meeting, at which JRP [John Rowan and Partners], Silcock
 9 Dawson, Rydon and Max Fordham were present. During this
 10 meeting, the [clerk of works] Reports were reviewed for
 11 outstanding points. Those points were then identified
 12 and responsibility was allocated to an individual
 13 present at the meeting to address them. A number of
 14 outstanding issues on fire stopping and fire sealing
 15 were identified and were the responsibility, in each
 16 case, of Dave Hughes of Rydon. Jon White also raised
 17 a number of issues at the meeting relating to
 18 fireproofing. Apart from the instruction of a quotation
 19 for fireproof painting, those issues were the
 20 responsibility of Dave Hughes. Once again, as would be
 21 expected for a project of this nature, outstanding
 22 issues were identified and arrangements were made for
 23 them to be addressed before completion. In any event,
 24 as I explain in paragraphs 112 and 113 below, both
 25 Silcock Dawson and [John Rowan and Partners] later

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1 formally signed off on Rydon's works for the purposes of
 2 certifying practical completion."
 3 Do you see that there?
 4 A. Yes.
 5 Q. So if we can go back one page, I want to ask you about
 6 some of these outstanding issues. It's said there:
 7 "A number of outstanding issues were identified on
 8 fire stopping and fire sealing ..."
 9 Do you recall what those issues were?
 10 A. One of the issues was to do with the fire sealing of the
 11 communal pipes through the floors in the heating
 12 cupboards on each lobby.
 13 Q. Yes.
 14 A. So from the 4th floor up to the 24th floor, there was
 15 a new heating cupboard where all the new communal
 16 pipework came up, and to do that, they drilled holes
 17 through the floor. As I say, the clerks weren't happy
 18 what had been done, or it wasn't 100% in accordance with
 19 the specification, what had been specified, so they were
 20 raising a concern with it.
 21 So, as I say, I don't agree it was my
 22 responsibility, but I went through the process of
 23 managing and getting the subcontractors or whoever
 24 needed to do the works --
 25 Q. Yes.

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1 A. -- to get them signed off, and like he said, the
 2 clerks -- we did what was required and to the
 3 satisfaction of the clerk of works.
 4 Q. Yes. That was my next question: did you agree that
 5 these were your responsibility in each case?
 6 A. I would say he is saying their Rydon's responsibilities
 7 as a main contractor, and I was the one sitting in the
 8 meeting, so they're saying, yes, you're the one who
 9 needs to ... thing. Whether or not I'm responsible for
 10 it, I'm not the one doing the work, I'm managing the
 11 work.
 12 Q. Yes.
 13 A. So I'm responsible for, yeah, making sure the job is
 14 done or getting the relevant subcontractors to do what
 15 was needed.
 16 Q. Yes.
 17 There's also reference there to fireproofing two
 18 lines below that:
 19 "Jon White also raised a number of issues at the
 20 meeting relating to fireproofing."
 21 Do you see that?
 22 A. Yes.
 23 Q. Do you know what that's referring to as distinct from --
 24 A. I think fireproofing is to do with the intumescent paint
 25 to the steelwork. To me, that's fireproofing, is to --

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1 almost painting steel in a sort of intumescent fireproof
 2 or fire paint.
 3 Q. Yes.
 4 A. Fire sealing was to do with penetrations through
 5 holes -- or penetrations through floors, sorry, or
 6 walls.
 7 Q. Yes.
 8 The meeting minutes of that we can just have a look
 9 at, {ART00006688}. We can see at the top it says,
 10 "[Clerk of works] COW Reports Review Meeting Minutes"
 11 dated 12 January 2016. Do you see that there?
 12 A. Yes.
 13 Q. We can see you're in attendance, together with the clerk
 14 of works and some others.
 15 If we look at page 5 {ART00006688/5} of the minutes,
 16 at the bottom of the page, fourth line from the bottom,
 17 it says there:
 18 "Fire proofing - all around the site (new and
 19 existing) needs to be done as per the Fire Strategy."
 20 Then your initials are next to this.
 21 A. Yes.
 22 Q. What fire strategy is being referred to there?
 23 A. As far as I was concerned, it was the fire strategy
 24 drawings.
 25 Q. Right, yes. And the fireproofing is as per your

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1 description just now, is it?
 2 A. Yes. To me, that's what fireproofing is, yes, more
 3 a coating of materials.
 4 MS GRANGE: I see.
 5 Mr Chairman, I'm about to start a related topic,
 6 which is a little bit more on the clerk of works, but
 7 I think if I start the next bit I'm going to --
 8 SIR MARTIN MOORE-BICK: I think it might be better to have
 9 a break now, mightn't it?
 10 MS GRANGE: Exactly.
 11 SIR MARTIN MOORE-BICK: How are you getting on? Quite
 12 steadily?
 13 MS GRANGE: We are getting on fine, yes.
 14 SIR MARTIN MOORE-BICK: Mr Hughes, we will have another
 15 break now so we can all get some lunch. Please don't
 16 talk to anyone about your evidence or anything to do
 17 with the refurbishment while you're out of the room.
 18 THE WITNESS: Okay, thank you.
 19 SIR MARTIN MOORE-BICK: And we will resume at 2 o'clock,
 20 please. All right?
 21 THE WITNESS: Okay, thank you.
 22 SIR MARTIN MOORE-BICK: Thank you very much. If you would
 23 like to go with the usher.
 24 (Pause)
 25 2 o'clock, then, please. Thank you.

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1 (1.00 pm)
 2 (The short adjournment)
 3 (2.00 pm)
 4 SIR MARTIN MOORE-BICK: All right, Mr Hughes?
 5 THE WITNESS: Yes, thank you.
 6 SIR MARTIN MOORE-BICK: Ready to continue?
 7 THE WITNESS: Yes.
 8 SIR MARTIN MOORE-BICK: Yes, Ms Grange.
 9 MS GRANGE: Thank you.
 10 I just want to start by correcting something I said
 11 earlier this morning about John Hoban's site visits.
 12 I put it to you that John Hoban's visit in October 2015
 13 was only the third of that year. We have checked the
 14 point, and while there are only two visits officially
 15 recorded in the RBKC system, their electronic system, we
 16 think there may have been more based on other material.
 17 Now, we have not yet had Mr Hoban's evidence, and he
 18 will be asked about this in more than detail, but what
 19 I want to do is just ask you whether you had any
 20 concerns during your time on site about the frequency of
 21 site visits from Building Control.
 22 A. During my time, no concerns at all about frequency. It
 23 would be what I expected.
 24 Q. Yes.
 25 Now, another topic we discussed this morning was

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1 about the taping of joins and joints on the insulation
 2 boards. Do you remember?
 3 A. Yes.
 4 Q. You said to me that:
 5 "... the joins on the insulation boards weren't
 6 taped. I asked Taff and Bez this question and they said
 7 that they didn't need to, and that's when I went back
 8 and referred to the Celotex -- or had a look at the
 9 Celotex brochure ..."

10 Then you carried on, and you said that you could see
 11 nothing in the Celotex brochure that it needed to be
 12 taped.

13 Now, I just want to look at the Celotex rainscreen
 14 cladding guide, first of all. This is at {CEL00000013}.
 15 Do you recall whether it was this document that you
 16 looked at?

17 A. That wasn't the document I looked at.

18 Q. No, okay.

19 A. It was more of a datasheet.

20 Q. This is the rainscreen cladding specification guide
 21 dated 27 August 2014, and if we go to the page 14
 22 {CLG00000013/14} and look on the right-hand column, if
 23 we could blow up the top of that page, above the heading
 24 "Selection of fasteners" on that right-hand column, it
 25 says:

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1 "In all cases, the joints of the insulation boards
 2 should be taped with a self-adhesive aluminium
 3 rainscreen foil tape with a minimum width of 75mm."

4 Do you see that there?

5 A. Yes, I do.

6 Q. But you hadn't looked at this guide?

7 A. No.

8 Q. So you didn't find anything in the literature you looked
 9 at?

10 A. No, I didn't see that, and I never read that guide. I'm
 11 pretty sure it was a product brochure sheet or the
 12 product datasheet I read.

13 Q. Right, yes.

14 Can I also have a look at the Harley method
 15 statement for cladding installation. This is
 16 {RYD00044095}. So we see the Harley method statement
 17 for Grenfell Tower, and it says, "Activity: Installing
 18 Column Cladding". Do you see that on that first page?

19 A. Yes.

20 Q. I want to look at something on page 3 {RYD00044095/3}.
 21 Point 9 at the top, there is a series of numbered
 22 points, and it says this:

23 "When all the brackets have been installed on the
 24 cladding rails, operatives will install the vertical
 25 firebreaks in the same position as the internal party

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1 walls (marked up drawing attached), making sure that the
 2 joints are butted tightly together and the joints taped
 3 with adhesive backed foil 'O' tape. Joints against the
 4 existing concrete should be sealed with suitable
 5 intumescent mastic."

6 Do you see that there?

7 A. Yes.

8 Q. Had you read that Harley method statement when you were
 9 considering the point about taping of joints?

10 A. I know I read a method statement for Harleys, because
 11 they had a number of them. This one specifically for
 12 the cladding, I don't know whether I read the earlier
 13 one, but I certainly read a Harley one and I didn't note
 14 that.

15 Q. Actually, if we look at the next paragraph, paragraph
 16 number 10, I think this is actually clearer about the
 17 insulation. It says:

18 "Operatives will then fit the 100mm thick insulation
 19 around the brackets and firebreaks, taping joints with a
 20 class 0 adhesive foil tape where necessary."

21 Do you see that there?

22 A. Yes.

23 Q. So that's very clearly saying it's part of the Harley
 24 method statement that Osborne Berry ought to be taping
 25 with a class 0 foil tape around the joints.

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1 A. I would say that they didn't do number 9 but they did do
 2 number 10, because they taped the joints between the
 3 boards and the firebreaks or the cavity barriers, so
 4 that was taped.

5 Q. But you don't think they did number 10?

6 A. No. They didn't do number 9 but they did do number 10.

7 Q. I see. I thought you said to us earlier that you
 8 checked and the joins in the insulation boards didn't
 9 need to be taped.

10 A. I'm talking about joins between boards. The join
 11 between the boards and the cavity barriers were to be
 12 taped, that's what I was told, and everywhere I saw,
 13 that was done. So I'm only talking about where two
 14 insulation boards butt up against each other. They were
 15 the joins I was talking about that I checked. But I was
 16 told and everywhere I saw, where a board butted up with
 17 a cavity break, that was to be taped and that --

18 Q. Right.

19 A. Everywhere I looked, I saw that.

20 Q. So you didn't understand from anything in this method
 21 statement that the joins of the insulation boards
 22 themselves should be taped to one another?

23 A. As I say, I didn't read this, or -- I'm sure I read
 24 a method statement, and there were a number of them,
 25 because this is specifically for the cladding on the

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1 column panels, I think I must have read one of the
 2 earlier ones. Well, if it says there, then they should
 3 have been doing it.
 4 Q. Can you explain why you wouldn't have read this method
 5 statement if you were supervising this aspect of the
 6 works?
 7 A. I can't, no. I'm ...
 8 Q. Okay.
 9 Just a couple of other points from this morning.
 10 You mentioned that the FR in FR5000 stood, you
 11 thought, for flat roof.
 12 A. Mm-hm.
 13 Q. Do you remember saying that?
 14 A. Yes.
 15 Q. Can you recall, how did you come to that view?
 16 A. I don't remember, but it's something I have
 17 a recollection of.
 18 Q. Right. So you don't know who told you that the FR stood
 19 for that?
 20 A. Specifically -- I don't know if that was from before the
 21 fire or after the fire, but as I say, I knew that the
 22 boards being fitted at Grenfell were RS5000.
 23 Q. Yes. Okay. I see.
 24 Now, I think a couple of times this morning you said
 25 that when you started on the project you looked at any

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1 relevant NHBC guidance; do you remember that?
 2 A. No, I didn't say I looked at it, I said that would be
 3 the document I would go to if I had any queries.
 4 Q. Yes, I see.
 5 A. I wouldn't go to Building Regulations, that's too
 6 high-level for me, so I would deal with the NHBC
 7 guidance.
 8 Q. Do you have a recollection of ever looking at any NHBC
 9 guidance on this project?
 10 A. No, I don't, not specifically on this project, but it
 11 would surprise me if I hadn't, because certain things,
 12 that's where I would look.
 13 Q. Yes.
 14 Let me just show you a piece of NHBC guidance and
 15 see if that triggers any recollection. So if we can go
 16 to {NHB00001317}. So this is a NHBC workbook on
 17 cladding systems from 2015. Do you have a recollection
 18 of looking at that?
 19 A. Never seen it.
 20 Q. No.
 21 Can we look at page 24 {NHB00001317/24} of this
 22 workbook, and I want to look at the second paragraph
 23 down on that page. It says there:
 24 "In buildings of over 18m in height, insulation and
 25 filler materials in walls is required to be of limited

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1 combustibility for the entire envelope."
 2 Pausing there, I think you confirmed this morning
 3 that wasn't something you were aware of at the time of
 4 working on the project.
 5 A. No, I wasn't aware.
 6 Q. Then it says:
 7 "Kingspan Kooltherm K15 rigid insulation is
 8 currently the subject of debate and further
 9 investigation after its suitability for use in certain
 10 construction types of buildings over 18m has been called
 11 into question."
 12 I wanted to ask you about that: were you ever aware
 13 that the use of Kingspan K15 in buildings over 18 metres
 14 had been called into question?
 15 A. Not aware at all.
 16 Q. Or the subject of debate?
 17 A. No.
 18 Q. No.
 19 Then before I pick up on where I was at this
 20 morning, we want to take you to a photograph of the
 21 tower, which I believe was October 2015. If we can go
 22 to {RYD00055130}. This is, we believe, either the east
 23 or the west façade. We know it's either the east or
 24 west because that has only two columns down the middle.
 25 Do you remember? And the north or south has three. So

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1 we can't be clear which of the two it is, east or west,
 2 but we've zoomed in, and with the help of the operator
 3 I think we can zoom in to some of the branding on the
 4 insulation. I don't know whether you can see that.
 5 It's not terribly clear, but we think that that is some
 6 Kingspan K15 that you can see in the middle of this
 7 page. Do you see that?
 8 A. Yes.
 9 Q. It has a blue logo going diagonally across the page. Do
 10 you see that?
 11 A. Yes.
 12 Q. Just to be clear, it's your evidence, is it, that you
 13 weren't aware of any K15 being used on the building
 14 prior to you approving it in late December 2015, early
 15 2016; is that right?
 16 A. I confirm that, yes.
 17 Q. Yes, okay.
 18 A. Sorry, when were these photos taken?
 19 Q. We believe October 2015.
 20 A. Because I believe I took that photo. As I say, the
 21 first week I was there, I took a photo of each
 22 elevation.
 23 Q. Yes.
 24 A. And that would be basically what state the building was
 25 in when I went to site.

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1 Q. Yes, okay. Thank you.
 2 So just picking up where I left off, I was about to
 3 turn to look a little bit more at your relationship with
 4 John Rowan and Partners, the clerk of works on the
 5 project. I want to go to some minutes of a progress
 6 meeting in September 2015, so just before you joined
 7 site. This is at {ART00006666}.
 8 So we can see there this is progress meeting 15,
 9 held on 18 September 2015. If we go to item 7.4 on
 10 page 7 {ART00006666/7}, if we can zoom in, it says
 11 there:
 12 "Quality Control - Rydon is not responding to the
 13 CoW's observations and comments Re quality, etc. Issues
 14 are not being resolved and responses are not being
 15 provided. Rydon to remedy as part of the Design Meeting
 16 process covered off earlier in the meeting."
 17 Do you see that there?
 18 A. Yes.
 19 Q. Now, when you were preparing to join the project, did
 20 you read any of these progress minutes?
 21 A. No. Well, I had one day preparation.
 22 Q. But you didn't read them, say, in the couple of weeks
 23 afterwards when you were first there?
 24 A. I do -- when I get on site, I do read as much as I can
 25 do to try and get a bit of a history on it, but I don't

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1 specifically read in old site meeting minutes.
 2 Q. But were you made aware of anybody else of concerns
 3 expressed by the clerk of works that their observations
 4 were not being listened to by Rydon?
 5 A. Yes, the clerks made it aware to me, I believe, in
 6 a meeting, and that was part of the reason for that
 7 meeting in January that we discussed earlier --
 8 Q. Yes.
 9 A. -- of going back to through the old reports and getting
 10 all the outstanding issues into one list and resolving
 11 them.
 12 Q. Right.
 13 Can you tell us any more about the nature of their
 14 concerns about quality? Were you given any details?
 15 A. I would say it is because the same things were appearing
 16 on reports on a number of times.
 17 Q. Yes.
 18 A. We could say they're not being resolved. I would like
 19 to think that if something appears on a report once,
 20 I would try and sort it out and make sure it doesn't
 21 happen again.
 22 Q. Can you recall what kind of things they were raising
 23 about the cladding?
 24 A. Cladding, no, but it would be -- if they were
 25 outstanding, it would have been what was discussed in

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1 that meeting in January.
 2 Q. Yes, I understand.
 3 Can we turn on to some more minutes of a progress
 4 meeting held on 17 November 2015. This is
 5 {ART00005184}, and this time we can see that you are
 6 present, David Hughes, five lines down there.
 7 Then if we can go to page 3 {ART00005184/3} of the
 8 minutes and look at item 2.13, it says there:
 9 "This matter is ongoing in that Rydon is not
 10 formally responding to the queries, direction and
 11 observations provided by Jon and Tony. SB [Steve Blake]
 12 confirmed that Rydon had no comments on the issues being
 13 raised in the CoW reports. But the issue remains that
 14 the CoW are expecting a response to allow matters to be
 15 concluded satisfactorily. Rydon did not provide a
 16 commitment to respond and suggested that issues that
 17 need addressing could be raised in an email to SB. NR
 18 [Neil Reed] stated that this was not satisfactory and
 19 responses to the CoW reports are key to ensure outcome
 20 certainty is managed Re all things compliance and
 21 quality. TB [Tony Batty] noted that items will be
 22 reviewed at ultimate inspection at handover and if not
 23 resolved the certificate of [practical completion] will
 24 not be issued. NR supported the statement."
 25 Do you see that there?

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1 A. Yes.
 2 Q. So looking at that, can you explain why it was that
 3 Rydon was failing to respond to the issues raised in the
 4 clerk of works reports?
 5 A. I don't want to comment on what happened before, but
 6 I do know afterwards that I started to respond to their
 7 reports and, as I say, tried to close out the snags or
 8 any defects or any issues they had as quick as possible.
 9 Q. We can see three lines up from the bottom that the
 10 concern seems to be about "outcome certainty is managed
 11 Re all things compliance and quality". Were you aware
 12 that they were concerned about the compliance of the
 13 works?
 14 A. Well, that's their job, is to ensure that, as I say, to
 15 me, it complies with the plans and specification.
 16 That's what I would say they're assessing their works
 17 on, so yes. And as I say, also note the last statement,
 18 where it says if it wasn't resolved, we wouldn't have
 19 got PC. So my job and what I did over the next
 20 nine months was to ensure that the clerk of works, all
 21 the issues were resolved.
 22 Q. Can we look at an inspection report that Jon White
 23 produces in December 2015, this is at {RYD00063728}. So
 24 with regard to, on page 1, resources -- so this is dated
 25 10 December 2015, and I just want then to look at --

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1 there's a whole section headed "Resources", and I want
 2 to look in the comments box there. So it says this:
 3 "One of [the] site managers Jason, who is the
 4 longest site manager, is away for approximately 4 weeks.
 5 Also Jack the trainee foreman is not in, and Chris is
 6 also not in. Rydons need to get additional supervision,
 7 otherwise site safety could be compromised. Also the
 8 contract manager Steve Blake has not been on site all
 9 week."
 10 Do you see that there?
 11 A. Yes.
 12 Q. Now, do you recall receiving this inspection report?
 13 A. Yes, I would have received it. I was there on site and
 14 it would have been sent to me.
 15 Q. Did it concern you that so many site supervisors and
 16 site managers were absent at this time?
 17 A. Not overly, no. I felt we had the site under control.
 18 Q. So you didn't think that these concerns about presence
 19 on site were justified?
 20 A. There was obviously -- when I first started, there was
 21 Chris, Jason and Gary and Jack, who supervised, and
 22 myself, so you could say there was four site managers
 23 and one assistant, we went down to two site managers and
 24 one assistant in the time before Christmas. So, no,
 25 I wouldn't say that that was concerning. If I had been

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1 on site on my own, then yes, I probably would have been
 2 concerned, it would have been too much for me, but --
 3 Q. Okay.
 4 A. As I say, we knew that Jason was going away. I don't
 5 specifically know why Chris wasn't there that day. It
 6 might have been just a day off, I don't remember. But
 7 I know that Jason went away for four weeks over
 8 Christmas because he had a lot of leave to use up, so we
 9 were aware and we could manage Jason. I don't remember
 10 why Chris wasn't there.
 11 Q. So that's Jason North?
 12 A. Jason North, yes.
 13 Q. And Chris?
 14 A. Holt.
 15 Q. Chris Holt, yes.
 16 How did you plan at this point to ensure that
 17 adequate supervision was carried out?
 18 A. How do you mean? Sorry, I don't understand that
 19 question.
 20 Q. Well, did you think that there needed to be any changes
 21 in the light of this concern being flagged by the clerk
 22 of works?
 23 A. I knew Jason was planned leave, so no, and as I say,
 24 I can't remember whether I picked up his work, he was
 25 mainly looking after the bottom four floors at the time.

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1 Chris was looking after the internals, so as I say, it
 2 doesn't say anything about -- so I would say that it
 3 would be me and Gary who were still on site. Gary was
 4 looking after the communals. Gary could pick up Chris'
 5 work and I could pick up Jason's work.
 6 Q. Okay.
 7 A. So I don't think that's the same as if another site
 8 manager -- so we don't always, when a site manager has
 9 a holiday, ensure that somebody else comes in.
 10 Q. Yes.
 11 A. So, no, I don't -- I'm not concerned by that at all.
 12 Q. Okay.
 13 A. But I would say it was -- the clerk of works, it was
 14 within his remit to report if he thought it was
 15 under-resourced, but I don't agree that it was.
 16 Q. No, okay.
 17 Now, on page 2 {RYD00063728/2} of this report, we
 18 can see that he has given a score for health and safety,
 19 if we look at the top of the page. It's headed
 20 "Performance indicators", and there is a 7 for
 21 workmanship, a 7 for quality, but then only a 5 for
 22 health and safety. Do you see that there?
 23 A. Yes.
 24 Q. We can see from the key below that between 4 and 5
 25 demonstrates:

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1 "... inconsistency in achieving/meeting the required
 2 quality standards. Inconsistencies in performance
 3 evident. Responsive rather than pro-active approach to
 4 quality issues evident."
 5 Do you see that there?
 6 A. Yes.
 7 Q. Now, in the light of that, did you take any steps after
 8 this to improve your process of inspection and
 9 supervision?
 10 A. Not specifically, but I would hope that Jon, if he had
 11 any concerns, that he would raise them with me on site
 12 before he left. That was something I always tried to
 13 ensure with the clerk of works, that they didn't leave
 14 site without telling me what their concerns were. Part
 15 of the process of obviously managing their expectations
 16 and managing their view that they weren't being listened
 17 to was to ensure that he told me what the issues were
 18 and that I listened to him and dealt with it.
 19 So I don't specifically remember that 5 score.
 20 I don't know whether I consider it fair or not. But, as
 21 I say, I would expect him to tell me specifically what
 22 it was, and if it was purely related to the fact that he
 23 didn't think we had enough supervision, then I disagree
 24 with it.
 25 Q. Okay. But you don't recall a separate conversation with

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1 him about this?

2 A. I had lots of conversations with him. That's one of the

3 main parts of my job, is to talk to people. So, I'm

4 sorry, I don't remember specific conversations like

5 that, no.

6 Q. You don't recall a conversation where they were talking

7 about potentially health and safety not being

8 consistently dealt with?

9 A. Well, it also talks about four things about quality

10 issues, but in health and safety, no, I don't remember.

11 It might be that he had seen something and, as I said,

12 I would expect to see it.

13 I didn't always walk around with the clerks, but by

14 this time I would say that I probably had assumed the

15 number one role on site, so I would hope that they would

16 come and tell me what their concerns were, because

17 sometimes you don't get the report for another three,

18 four days, or possibly the next week, so if it is

19 a serious issue, they should tell me there and then.

20 But I don't remember what that one was, and I don't

21 know whether it says anywhere else in there whether

22 there was a specific health and safety issue that he was

23 giving us a 5 for.

24 Q. In your experience, did Rydon ever appoint its own clerk

25 of works to carry out inspections on projects?

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1 A. Never been my experience for that, no. That's what our

2 site manager role is.

3 Q. I see, so that's why you don't --

4 A. Part of our role is to manage it.

5 Q. Yes.

6 Just to pick up a few more questions about

7 information provided to Building Control, can we just

8 look at paragraph 72 of your witness statement. This is

9 on page 17 {RYD00094213/17}. You just say there:

10 "I also relied upon the advice received from and

11 approval given by the RBKC Building Control surveyors,

12 John Hoban and Paul Hanson."

13 Now, I want to ask about the information that was

14 shared with them.

15 When you started on site, did you ever enquire as to

16 what information Building Control had been provided with

17 about the external cladding system?

18 A. About the external cladding system, no.

19 Q. Did they ever indicate to you at any time during your

20 dealings with them that they didn't have the information

21 that they required in terms of the external cladding?

22 A. No.

23 Q. Now, in paragraph 58.4 of your statement -- this is on

24 page 12 {RYD00094213/12} -- this is in the context of

25 the alterations to the community room layout to

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1 accommodate the AOV, and in the last few lines you say:

2 "I definitely sent a drawing to the architect for

3 his approval and showed this alteration to John Hoban,

4 RBKC Building Control surveyor, during one of his

5 visits."

6 Do you see that?

7 A. Yes, I do.

8 Q. Now, when Building Control were on site, did you

9 regularly show them drawings during their site visits?

10 A. No.

11 Q. Did you ever give Building Control drawings to take away

12 with them?

13 A. Not to my recollection, no.

14 Q. So it would follow from that, would it, that there was

15 no record of what information or drawings had been

16 provided to Building Control by you and Rydon?

17 A. As I say, any drawing that I provided, it would probably

18 be done by email, so the record would be on email, but

19 I would say that the record is what they were given

20 to -- when they were -- the application was put in,

21 so ...

22 Q. At any stage during any of their site visits, were any

23 concerns raised with you about compliance with the

24 Building Regulations?

25 A. Well, I would say that any, say, any snag or any issue

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1 he raised, specifically, like I say, towards the end,

2 was always about compliance with Building Regulations.

3 It was ensuring -- as I say, that's what my

4 understanding is, that's their role, to come and

5 basically say, yes, you have built in compliance with

6 it, or compliance with the drawings that they were

7 given.

8 Q. Yes.

9 I want to look in a little more detail at the visit

10 that Building Control did on 7 January 2016, because

11 we've got some minutes of this.

12 Now, you refer to this meeting at paragraph 61.4 of

13 your statement on page 13 {RYD00094213/13}, if we can

14 just have a look at that. You say there:

15 "Steve Blake and I had a meeting on site with the

16 two senior building control surveyors, John Hoban and

17 Paul Hanson ... on 7th January 2016, also in attendance

18 was Neil Crawford, the architect from Studio E ... The

19 purpose of the meeting was to discuss what would be

20 required to achieve Building Control completion prior to

21 handover to the client. We initially met in the site

22 office for the first part of the meeting and then walked

23 the relevant parts of the building. I took the minutes

24 of this meeting [and you exhibit them] ... and

25 distributed them to all attendees and requested

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1 a response from John Hoban and Paul Hanson if they had
2 any comments."

3 Do you see that there?

4 A. Yes.

5 Q. Then you go on and say that you distributed those
6 minutes to the client team.

7 You mention in the last few lines of that paragraph
8 of your statement that there is a typographical mistake
9 in the minutes about the existing riser cupboards, and
10 you have explained what that mistake is.

11 Can we look at those minutes, {RBK00003856}. So
12 this is, these are minutes of the meeting that was held
13 there with John Hoban, Paul Hanson, Neil Crawford.

14 You can take it from me, we have looked through
15 these minutes and they contain no information about the
16 external façade. Is that because you didn't discuss the
17 external façade with RBKC Building Control at this
18 meeting?

19 A. I don't remember discussing it in detail, but as I say,
20 it was a lot to do with concerns and making sure and
21 everything else, so if they had no concerns on it then
22 it probably wouldn't have been noted in the minutes.

23 Q. Yes.

24 A. I honestly don't remember if we did discuss it in that
25 meeting.

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1 Q. Okay, yes. Well, we can't see anything from these
2 minutes.

3 A. No.

4 Q. As we just saw, you said in your witness statement that
5 you distributed the minutes and requested comments, but
6 what you don't do is mention whether or not you received
7 a response to those comments, and I just want to look at
8 the comments you did get.

9 A. Okay.

10 Q. So if we can turn to {RYD00063791}, this is an email
11 from you, if we could look at the top of the page, to
12 John Hoban, and you say, on 12 January 2016:

13 "Hi John

14 "Following your visit to site and our discussion,
15 your only comment on the minutes was that there was no
16 mention of fire stopping to penetrations through walls &
17 floors.

18 "Please could you confirm this is correct?"

19 Do you see that there?

20 A. Yes.

21 Q. So is it right that there was a discussion about
22 firestopping to penetrations through walls and floors
23 but that hadn't been put in the minutes?

24 A. Yes. Well, it must have been because that's what he
25 wrote. I believe obviously that was around the time

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1 that John came back to site, so I would have verbally
2 asked him if he had any issues with those meeting
3 minutes I distributed the week before, and he must have
4 said that yes, the only thing was there was no mention.
5 So that's why I was confirming that, apart from that, he
6 was happy with the minutes.

7 Q. Looking at your statement at paragraph 61.5 on page 14
8 {RYD00094213/14}, you say there:

9 "I arranged for John Hoban to visit site on
10 12th January 2016 ... to go up the mast climbers again.
11 I followed up the meeting with an email confirming a
12 conversation about fire stopping to penetrations through
13 walls and floors."

14 We just wanted to be absolutely clear when that
15 conversation was had. Do you mean that the conversation
16 was had during the meeting on 7 January, or that it was
17 had on 12 January?

18 A. The conversation about firestopping -- well, sorry,
19 firestopping and penetrations were obviously talked
20 about on the meeting the week before, so the 7th, and
21 I hadn't made a note on the minutes, because, as I say,
22 it was a walk-round meeting, so I was walking around,
23 trying to make notes in my book as we went around.
24 There was a number of people talking. I tried my best
25 to get an accurate recollection of those minutes down

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1 and, as I say, wrote them -- I'm pretty certain I wrote
2 the minutes the next day to make sure that it was fresh
3 in my memory, but I must have missed that bit, and that
4 was his recollection, so his comment back was, "You have
5 made no note of it", so I was confirming back.

6 So the actual conversation about firestopping and
7 penetrations would have been had on the walk-round.
8 That should have been noted in the minutes and it
9 wasn't, but I was asking him to confirm verbally on his
10 visit the next week, and that's what he said.

11 Q. I follow.

12 A. So I confirmed it back to him.

13 Q. Thank you.

14 Can we look at something Mr Hanson said as well in
15 his reply to the minutes. This is at {RBK00003863}. So
16 this is his response at the top of the page, if we can
17 zoom in on that, and he says:

18 "Dear Dave

19 "I have reviewed the minutes and confirm they are
20 accurate regarding my reference (means of escape). In
21 addition John Hoban (RBKC building control) did also
22 mention about fire stopping particularly above door
23 frames."

24 Do you see that there?

25 A. Yes, I do, yes.

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1 Q. Now, can you recall now for us, what was the discussion
2 that was had about firestopping?
3 A. It was -- if I remember correctly, it was about
4 firestopping to the front doors above the new flats that
5 we were building.
6 Q. Right.
7 A. So we built nine new flats in there.
8 Q. Yes.
9 A. At that time there was only eight of them because we
10 didn't build number 6 until later, but it was regarding
11 that.
12 Q. Yes. Yes.
13 A. Just to give you -- we did a thorough walk-round of that
14 building with them at the time to make sure that we had
15 gone over everything that we might need or was
16 outstanding, and that was supposed to be an accurate
17 record of that meeting. I obviously missed the part
18 about the thing, but, as I say, it was me trying to take
19 notes as I walk around involved in the meeting as well.
20 Q. Can you recall whether there was any issues raised about
21 firestopping to the windows?
22 A. No, I can't recall, and I say, if it was, I would have
23 hoped I would have written it down.
24 Q. Yes.
25 A. Obviously I missed the bit about fire stopping

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1 penetration, but I would hope that if we had the thing,
2 that they would also have noted them --
3 Q. Yes.
4 A. -- from my conversation with John or from Paul that we
5 had. So I can only say that no, there wasn't.
6 Q. We can see here Mr Hanson is saying particularly above
7 door frames, which is what you have confirmed, but the
8 reason I'm putting that to you is because this has been
9 suggested by Mr Hoban, and I want to look at his witness
10 statement. This is at {RBK00050416/9}, right at the
11 bottom. So Mr Hoban is asked the question:
12 "Did you ever raise concerns about the compliance of
13 the windows at any stage during the project?"
14 Do you see that? Then if you go over
15 {RBK00050416/10} we get the response:
16 "Possibly. During site visits I would make physical
17 note[s] in my A3 notebook and raise any concerns with
18 the site manager or the person escorting me. I have
19 been informed RBKC cannot locate my notebook."
20 Then he says this:
21 "Additionally, email from David Hughes on 12.01.16
22 at 1620 states that raised the issue of fire stopping
23 during a site visit. This could relate to the windows
24 but without sight of my notes I cannot be sure."
25 So you can see Mr Hoban suggested it might have been

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1 the windows but he can't be sure. We just want to get
2 your recollection of whether that issue about
3 firestopping had anything to do with windows.
4 A. My recollection of the firestopping is as I said: it was
5 to do with the front doors to the new flats. As I say,
6 I don't believe it was anything to do with the windows.
7 Q. Yes.
8 Did you ever amend your minutes in the light of the
9 comments that you got about firestopping and
10 penetrations?
11 A. No, because I had -- the only note I got was from
12 Building Control that that was the only error on them.
13 So that was -- the email was a note that there was
14 an error, so no, I did not.
15 Q. Why would you not amend the minutes once you got those
16 comments back?
17 A. I would like to think -- as I say, I would like to say
18 I did, but I didn't. I didn't have time, I don't know.
19 Q. What we can see is that just over four months later you
20 shared these meeting minutes with Claire Williams and
21 Janice Wray of the TMO. This is {TMO10045169}. It's
22 an email dated 25 May 2016. If we zoom in on that top
23 email, you say there in the first line:
24 "Following our FRA meeting yesterday, please see
25 confirmation e-mail below from Paul Hanson regarding

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1 acceptance of minutes from design team meeting held back
2 in January."
3 Do you see that there?
4 A. Yes.
5 Q. We have checked and the minutes that you attached to
6 this email were unamended, so they hadn't got anything
7 in about firestopping being raised by Building Control.
8 On what basis did you take Paul Hanson's response
9 that you have set out below as acceptance of the
10 minutes? Wasn't he actually raising a point that had
11 been missed in the minutes?
12 A. Yes, regarding that point that I had missed the thing,
13 but I would say that it was -- I was specifically
14 replying about an issue about fire alarms at this point,
15 or heat detectors on the first floor.
16 Q. I see. So that's why you are saying he accepted that
17 bit of the minutes?
18 A. Penetrations and firestopping has no relevance to what
19 I was sending it to in this point.
20 Q. I see.
21 Just the last point on this, if we can look at some
22 Artelia meeting minutes from progress meeting 19, this
23 is on {ART00005321}. So these are meeting minutes,
24 progress meeting 19, 26 January 2016, and we can see
25 that you're present.

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1 Then on page 5 {ART00005321/5} at the bottom of the
 2 page, it's point 3.10.1, it says, "DH", so that's you,
 3 yes, David Hughes?
 4 A. Yes.
 5 Q. "... confirmed that the Approved Building Control
 6 Inspector had confirmed in writings details found with
 7 Building Control Meeting Minutes issued on 08/01/16."
 8 Do you see that there?
 9 A. Yes.
 10 Q. Again, it wasn't entirely correct that he had confirmed
 11 the meeting minutes because they had actually raised
 12 an issue that hadn't been covered in them, hadn't they?
 13 A. I agree with what you're saying, yes, they weren't 100%
 14 correct, but I also had a record of what the issue was,
 15 so it was that one thing about firestopping and no
 16 mention of it.
 17 Q. Yes, then if we look at --
 18 A. So I would say from that that the rest of the minutes
 19 are correct, but yes, I do agree with your statement,
 20 they aren't 100% accurate.
 21 Q. Yes.
 22 Then if we look at point 3.10.2, it says this:
 23 "SB [Steve Blake] noted that the Inspector had
 24 identified areas of existing Fire Compartmentation which
 25 needed addressing. It was discussed and agreed that

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1 although these works are not required under the current
 2 contract it may be beneficial to the TMO to carry out
 3 these works to improve the condition of the building.
 4 SB to draw up a proposal identifying scope, cost and
 5 programme implications of undertaking this additional
 6 work to be issued to CW [Claire Williams] and Artelia.
 7 [Claire Williams] will then review the necessity of
 8 these works ..."
 9 Can you help us as to what that was referring to,
 10 existing fire compartmentation issues?
 11 A. It was referring to the existing riser cupboards, either
 12 side of the lift, the ones where I talk about in the
 13 meeting minutes not -- or made my mistake about the
 14 chipboard. If you took those chipboard off there,
 15 that's where the old riser pipes used to rise for the
 16 original heating system and water distribution system
 17 and the electric system as well. Over the years, people
 18 had come and added, I think, telecom and telephone bits
 19 down it, so not all of them were firestopped between
 20 floors, there was some firestopping missing. So part of
 21 our process at the end was we went round and firestopped
 22 those holes.
 23 The only hole that we didn't firestop was impossible
 24 to do so, was on the left-hand side of the lifts. As
 25 you looked at the lifts, the cupboard on the left-hand

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1 side, one of the first parts of that was the main
 2 electrical busbar for the building which rose through
 3 all 24 storeys of the building. As I say, the only way
 4 to firestop that would have been to turn the whole
 5 building off.
 6 Q. Right, yes, thank you.
 7 A. Other than that, it was mainly -- from what I remember,
 8 it was mainly the right-hand side. You could take the
 9 chipboard off and you could see holes which hadn't been
 10 fire proofed.
 11 Q. Yes, thank you, that's really helpful.
 12 So I now want to ask you some questions about Exova
 13 and fire engineering in terms of the project.
 14 Now, is it right that you were the fire co-ordinator
 15 on the project when you were --
 16 A. Yes.
 17 Q. Yes. We can see that from Rydon's project fire plan for
 18 Grenfell Tower dated May 2016. If we look at that, this
 19 is {CST00000033} on the first page. So this is the
 20 construction project fire plan and you're down there as
 21 the fire co-ordinator; yes?
 22 A. Yes.
 23 Q. Did you receive any training for the purposes of
 24 carrying out that role?
 25 A. I have been on a fire safety training course, yes, but

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1 specifically it's about managing fire risk during the
 2 construction phase.
 3 Q. Yes. So you're not looking at fire safety beyond that?
 4 A. No, no, I haven't -- as I said before, I had never read
 5 the Building Regulations and it was never part of the
 6 training course I went on. It's about making sure
 7 essentially that there is enough fire extinguishers
 8 on site, they're the right ones for the work you're
 9 doing, people know where they are, there is a plan in
 10 place and everyone at induction stage is aware of the
 11 site fire procedures.
 12 Q. You say at paragraph 107 of your witness statement, if
 13 we can look at that on page 24 {RYD00094213/24}, you say
 14 there that, as part of your duties, you took on
 15 responsibility for reviewing the project fire risk
 16 assessment. Do you see that there?
 17 A. Yes.
 18 Q. You say:
 19 "The first review I carried out was in February 2016
 20 and then on a monthly basis after that."
 21 A. Yes.
 22 Q. You describe the project fire risk assessment
 23 immediately above that at paragraph 106, and you say
 24 it's part of Rydon Group's environment and quality
 25 procedures. Do you see that there?

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1 A. Yes.
 2 Q. You say in the third sentence there:
 3 "Its main focus is how to carry out the contracted
 4 works within the site, residential properties, communal
 5 and public spaces, and comply with the current
 6 regulations."
 7 Do you see that there?
 8 A. Yes.
 9 Q. Just to pull up this project fire risk assessment, it
 10 can be found at {RYD00077583}. It's dated
 11 February 2016, and it names you on page 2
 12 {RYD00077583/2} as the responsible person for the
 13 project. We can just look at that. Yes, so we see that
 14 there.
 15 Now, at paragraph 69 of your witness statement, if
 16 we could go and look at page 16 {RYD00094213/16} of your
 17 statement, you say this:
 18 "I read the Exova outline fire safety strategy
 19 report, dated 7th November 2013, when it was sent to me
 20 by Matt Smith from Max Fordham. It was sent to me to
 21 help answer a query about the difference in the numbers
 22 of smoke/heat alarms between the flats on the 1st floor
 23 and on the 3rd floor. I liaised with Matt Smith
 24 regarding the specification of the mechanical and
 25 electrical systems ..."

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1 When you started work on the project, were you told
 2 what Exova's role was?
 3 A. No.
 4 Q. What did you know about Exova's involvement in the
 5 project?
 6 A. At that time, I didn't think they are. My understanding
 7 the whole time I was at the project was that the Exova
 8 document, this fire strategy, was a tender document and,
 9 as I say, my understanding was it had been superseded by
 10 the fire strategy drawings from the architect.
 11 As I say, when I've done jobs right from the start
 12 we have lots of documents at the start of projects which
 13 to me are tender documents, and from those documents
 14 that's what you build up and sort of build your design
 15 from. So I -- my understanding was that the
 16 fire strategy drawings overruled that and it was just
 17 a tender document.
 18 Q. Yes.
 19 Did you know that Exova hadn't been instructed
 20 directly by Rydon?
 21 A. I knew that they were -- essentially had been instructed
 22 by Studio E, but that was only from reading that report.
 23 Before that -- I don't think prior to that report Exova
 24 had come up in any conversations, I don't believe.
 25 Q. So was that your understanding, that they had entered

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1 into a contract with Studio E?
 2 A. My understanding, as I said, was it was a tender
 3 document that the architects needed to formulate their
 4 fire strategy drawings.
 5 Q. Did you ever think about who their client was, Exova's
 6 client?
 7 A. No, not really. As I say, I thought it was the
 8 architects.
 9 Q. Let's just turn up that outline fire safety strategy
 10 dated 7 November 2013 which you say there that you read.
 11 It's at {EXO00001107}. We can see there it's issue
 12 number 3, 7 November 2013. So you must have been sent
 13 this no earlier than October 2015, when you came on to
 14 the project.
 15 Were you concerned when you were sent it that this
 16 fire strategy had not been updated between November 2013
 17 and the time when you were involved in the project?
 18 A. Not at all because, as I said, I thought it was a tender
 19 document and that -- 2013 was just before the tender
 20 period.
 21 Q. I see. So you weren't concerned that this tender
 22 document was now quite out of date, potentially?
 23 A. No, not at all. As I said, I thought it was superseded.
 24 As I say, I worked -- the plans and specification, that
 25 the fire strategy plans were what I was working to, and

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1 they were the most relevant documents.
 2 Q. Did you read the whole report?
 3 A. I believe I did, yes.
 4 Q. Can we look at page 9 {EXO00001107/9}. This is
 5 section 3.1.4. This is "Compliance with B4 (external
 6 fire spread)", and we can see it says there:
 7 "It is considered that the proposed changes will
 8 have no adverse effect on the building in relation to
 9 external fire spread but this will be confirmed by an
 10 analysis in a future issue of this report."
 11 Do you remember reading that at the time?
 12 A. Yes, I do remember reading it.
 13 Q. Did you notice that there was a promised analysis in
 14 a future issue of the report?
 15 A. I do remember reading it and, as I said, I didn't think
 16 it was an issue because it was done prior to drawings,
 17 it was at tender stage, so the Harleys drawings would
 18 supersede that. I don't remember whether it gave me any
 19 comfort or not, I just remember reading it but not
 20 really paying much attention to it because I wasn't
 21 looking at the document in that respect, I was looking
 22 for other information from it.
 23 Q. Did you ever ask anybody whether that analysis had ever
 24 been carried out?
 25 A. No.

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1 Q. Were you at all concerned that this strategy hadn't
2 fully addressed the external cladding?
3 A. No.
4 Q. Can you explain why that was the case?
5 A. Because the architect and Harleys had done the design,
6 so I would expect them to know and make sure the design
7 was compliant with Building Regulations, so ...
8 Q. Did you think to yourself when you read this about what
9 the proposed changes were that would have no adverse
10 effect?
11 A. No.
12 Q. No.
13 A. No.
14 Q. Did you notice -- can we go to page 4 {EX000001107/4} of
15 the document -- that the description that's provided
16 there -- so this is a description that's given right in
17 the introduction of the refurbishment of what it
18 comprises -- did you notice when you read it that it
19 didn't include the overcladding works?
20 A. No.
21 Q. Did you ever contact anyone in Exova to discuss the
22 cladding works?
23 A. No.
24 Q. Can we just look at a couple of emails on this topic.
25 So these are some emails from November 2015.

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1 Can we look at {TMO10044122}. So these are emails
2 between Matt Smith and Andy Bridges, but they copy you
3 in. Do you see that?
4 A. Yes.
5 Q. I just want to start with the email at the bottom of the
6 first page, sent by Matt Smith, and he says to
7 Andy Bridges, copying you in:
8 "Afternoon Andy
9 "I'm not confident the Fire Strategy document that
10 I have is the most up to date - you'd be best advised
11 getting a copy from Rydon."
12 Do you see that there?
13 A. Yes.
14 Q. Then if we look at the top of the page, to the response,
15 the response is:
16 "Good to meet you today, I will get the lighting
17 tech subs over in the next day or so, with regard to the
18 fire strategy document Dave has already sent it over,
19 fyi the reference is Issue no. 3, dated 07/11/13."
20 Do you see that?
21 A. Yes.
22 Q. Did you check when you received these emails whether the
23 document you had was the most up-to-date?
24 A. No, but it was the only one we had.
25 Q. So it didn't concern you that, two years after the third

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1 issue of this outline fire safety strategy, there had
2 been no update?
3 A. No, as I said, my understanding was, and the
4 understanding I had all the way through the project,
5 that it was a tender document. It was there to sort of
6 help the architects with designing their fire strategy
7 drawings, and, yeah, nobody ever said to me that it
8 needs to be updated.
9 Q. Can we look at another set of emails. This is in
10 April 2016. If we go to {TMO10013128/2}, at the foot of
11 the page, I want to start with that, is an email from
12 Claire Williams to you dated 27 April 2016 at 12.43. Do
13 you see that there?
14 A. Yes.
15 Q. She starts off:
16 "Dave
17 "We are putting together protocols for what happens
18 in the case of the detection system being activated, so
19 I need a couple of answers to the below ..."
20 Do you see that there? Then at item 1
21 {TMO10013128/3} she says this:
22 "Can I please have a copy of the latest fire
23 strategy document? I have an original version, but want
24 to make sure it has not changed, drawings would be
25 useful."

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1 Then I think what you have done -- is this right? --
2 is in blue you have answered her comments.
3 A. Yes, I do, yes.
4 Q. We know that because you say that in some emails further
5 up. You say:
6 "Exova Fire Strategy attached (not updated from
7 tender as far as I'm aware) & fire strategy drawings
8 attached (to be updated to as builds ?)."
9 Do you see that there?
10 A. Yes.
11 Q. You say there:
12 "Exova Fire Strategy attached (not updated from
13 tender as far as I'm aware) ..."
14 So you don't seem certain at the time of responding
15 to this email whether or not it had been updated.
16 Did you ever check with anyone else at Rydon to
17 establish whether it had been updated?
18 A. No, but I don't know who I -- well, the only person who
19 would check was Steve, but no, I never did.
20 Q. Did it occur to you to take any steps to discuss, say
21 with Steve Blake, the commission of an updated
22 fire strategy from Exova or another fire consultant?
23 A. No, I go back to my understanding. My understanding was
24 that it was a tender document and the fire strategy
25 drawings superseded that, the strategy, so ... nobody

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1 asked me ever to get it updated. Otherwise, if
 2 they had, I would have.
 3 Q. I mean, you can see from this that it doesn't look like
 4 the TMO themselves have requested an update, does it?
 5 A. No, no, nobody did.
 6 Q. Did you ever discuss the points you're responding to
 7 here in blue with Mr Ashton?
 8 A. I think you have a record of my only correspondence with
 9 Mr Ashton, which was to do with a smoke alarm in the hub
 10 room.
 11 Q. Yes.
 12 A. I believe that is the only correspondence I had with
 13 him.
 14 Q. I think you say in your statement that you had dealings
 15 with him by phone and email.
 16 A. Yeah, yeah.
 17 Q. So did you ever discuss on the telephone with him that
 18 the fire strategy document wasn't --
 19 A. No, I didn't, but it goes back to the -- he wrote the --
 20 and as far as I'm concerned, he was answering questions
 21 regarding the tender document. It was his report, he
 22 was answering questions regarding that.
 23 Q. If we can look at Ms Williams' response to your email,
 24 {RYD00075983}, she says this:
 25 "Dave

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1 "This still has the old TMO office - I think the
 2 fire strategy stuff may have been superseded on this
 3 basis."
 4 Do you see that there?
 5 A. Yes.
 6 Q. So I think it follows from your answers, but at this
 7 point, when she says it's been superseded, you didn't
 8 consider discussing with anyone the request of
 9 an updated document --
 10 A. No.
 11 Q. -- from Exova?
 12 Can we look at some clerk of works review meeting
 13 minutes. This is {ART00006688}. Now, we looked at this
 14 document before, I think, 12 January 2016, and on page 5
 15 {ART00006688/5}, three lines from the bottom, it says
 16 this -- we looked before at what it said about
 17 fireproofing, but I want to ask you now about this
 18 comment. It says:
 19 "Fire strategy needs to be updated as per on site
 20 discussions."
 21 Then your initials are there on the right-hand side
 22 in the column. Do you see that there?
 23 A. Yes, I do.
 24 Q. Now, what fire strategy is being referred to there, do
 25 you know?

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1 A. As I say, my understanding was it was the fire strategy
 2 drawings, and I'm pretty certain after this meeting that
 3 the architect updated the drawings and I sent them over.
 4 Q. I see. So this wasn't a reference to issue 3 of Exova's
 5 fire safety strategy for the building?
 6 A. If it was, it's not how I took it. I took it to be the
 7 fire strategy drawings, and I'm pretty certain that they
 8 were updated and sort of -- yeah, a week or so later,
 9 because this was very soon -- in and around the time
 10 that we had the meeting with the Building Control and
 11 the architect on site, and, as I say, it got -- this
 12 fire strategy got discussed at that meeting as well,
 13 so -- and the architect updated these drawings and
 14 things.
 15 So my understanding -- and I'm pretty certain that's
 16 how it got closed out, this -- was that the
 17 fire strategy drawings were updated.
 18 Q. Can we just look at paragraph 70 of your statement at
 19 page 16 {RYD00094213/16}. You say there:
 20 "During the period of my involvement there were a
 21 couple of times that Terry Ashton of Exova was consulted
 22 regarding specific advice on fire safety. Generally it
 23 was to do with queries raised in relation to the
 24 original fire safety strategy report. I personally
 25 corresponded with him about internal fire safety

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1 matters, by email and phone. My understanding was that
 2 he would answer any queries relating to the original
 3 fire safety strategy report."
 4 Do you see that there?
 5 A. Yes.
 6 Q. On what basis did you understand Mr Ashton would be
 7 answering any queries relating to the original fire
 8 safety strategy report?
 9 A. Well, I kind of got it from, I think it was Matt Smith,
 10 who said if you have any -- because I think I phoned
 11 Matt about the things, and he said, "If you have any
 12 queries about the report, ask Terry Ashton", and I don't
 13 remember whether the architect told me that as well.
 14 Q. Right.
 15 A. But I think it might have been, in fairness, from that
 16 earlier email you saw where Matt Smith and Andy Bridges
 17 from RJE were talking about it, and he said, "Any
 18 queries, go back to Terry about it", so that's what
 19 I did.
 20 Q. At any time when you were going back and forth to
 21 Mr Ashton, did you ever ask him whether Exova had
 22 considered the cladding or otherwise analysed the impact
 23 of the refurbishment on the external spread of flame?
 24 A. No, I did not.
 25 Q. In your experience, based on -- you have obviously

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1 worked for Rydon for a long time --

2 A. Yes.

3 Q. -- did Rydon normally engage a fire engineer when
4 carrying out major construction or refurbishment works?

5 A. My experience -- as I say, I have no experience of them
6 doing it, but that doesn't say that on the larger
7 buildings I've done, there hasn't been a fire strategy
8 document. But, as I say, I have no recollection of ever
9 seeing one on a Rydon site.

10 But I don't know if you're specifically talking
11 about, yeah, the high-rise buildings or the other
12 new-build buildings I've done for Rydon.

13 Q. I now want to ask you some questions about Carl Stokes,
14 the fire risk assessor.

15 A. Okay.

16 Q. If you look at paragraph 71, it's on this page, you say:
17 "I liaised with Carl Stokes, Fire Risk Assessor for
18 KCTMO, mainly answering his queries following his fire
19 risk assessment inspections."

20 Do you see that there?

21 A. Yes, I do.

22 Q. What was your understanding of Carl Stokes' role
23 relating to the refurbishment?

24 A. Well, my understanding was he had no role in the
25 refurbishment; he was the client's, so KCTMO's, fire

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1 risk assessor.

2 Q. Yes.

3 Now, at paragraph 102 {RYD00094213/23} of your
4 statement, can we have a look at that, you tell us that
5 you walked round the tower with Carl Stokes on
6 4 February 2016, and you say:

7 "The main purpose of this meeting was to look at
8 areas impacted by the planned opening of the entrance
9 atrium and the alteration to residents' access route
10 into the Tower."

11 Do you see that there?

12 A. Yes.

13 Q. But was that visit also to carry out a pre-assessment of
14 the building works prior to handover?

15 A. It was kind of that effect. The reason we called Carl
16 down, and I think it was done through Claire, was we
17 wanted to open the entrance lobby, and part of the sort
18 of requisite from the client was to get some kind of
19 completion certificate. We had asked Building Control
20 to give us a completion certificate for the area, so
21 they were -- the client or KCTMO expected that then it
22 would be safe for the residents to come through the
23 area.

24 Building Control, when I asked them, said, "No, we
25 won't give you a completion certificate until the whole

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1 building is done, that is more a fire risk assessment
2 thing", so then we asked the client to send their fire
3 risk assessor down to assess the new entrance route and
4 sort of the new access/egress route for the residents,
5 but he would say yes, it's safe for them to come
6 through.

7 Q. Yes.

8 A. Because we needed to get them through that entrance
9 lobby to be able to finish off the second floor where
10 the old entrance was, or where the old access bridge
11 was, because the old access was where the last flat was
12 going to go. So until we could get them coming through
13 the new lobby, we couldn't finish off our works.

14 Q. Right, thank you, that's helpful.

15 Can we just look at a couple of emails relevant to
16 this. {RYD00066527}. This is an email from Steve Blake
17 to Matt Smith and you're copied in, 1 February 2016:

18 "Hello Matt,

19 "I have arranged to meet Carl Stokes to carry out a
20 pre assessment of the building works prior to handover."

21 Do you see that there?

22 A. Yes.

23 Q. Yes.

24 Did you also understand that this visit was going to
25 enable Mr Stokes to prepare his record of significant

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1 findings and action plan which he then subsequently
2 prepared in April 2016?

3 A. That's just to me a grand name for his fire risk
4 assessment. That's what it was.

5 Q. Yes.

6 Let's have a look at an email briefly on this,
7 {RYD00065985}. This is Steve Blake and I think it's to
8 Carl Stokes, we can see he says, "Morning Carl", and
9 you're copied in. He says:

10 "Could we meet at Grenfell next Thursday ...

11 "We are rapidly reaching the conclusion of the
12 project and would appreciate the opportunity to ensure
13 we have covered all formalities in respect of a [fire
14 risk assessment]."

15 Do you see that there?

16 A. Yes.

17 Q. Now, Mr Stokes' record of significant findings and
18 action plan is dated 26 April 2016. Let's just turn
19 that up. It's at {RYD00094315/2}. This is what it
20 looked like. Do you remember seeing this on the
21 project?

22 A. Yes.

23 Q. Yes.

24 What was your understanding of the purpose of this
25 document?

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1 A. It was his fire risk assessment, so it was the client's
 2 fire risk assessment. He was working for KCTMO.
 3 Q. Was it to satisfy the TMO that fire safety issues had
 4 been resolved?
 5 A. Yes, that's the idea of a fire risk assessment, the
 6 purpose of it.
 7 Q. Yes.
 8 Now, we can see that you asked Mr Stokes to visit
 9 the site again just before this assessment was prepared
 10 on 7 March 2016 if we can go to paragraph 102 of your
 11 statement on page 23 {RYD00094213/23}. So we see that
 12 in the last line:
 13 "On 7th March 2016 I requested that he visit the
 14 site again."
 15 Do you see that there?
 16 A. Yes.
 17 Q. We can see this in your email to him of 7 March,
 18 {RYD00070161}. If we could blow the top up, this is
 19 an email from you to him, and you say this in the third
 20 paragraph there:
 21 "I'd like to get you back to site this week to
 22 update the Grenfell FRA to satisfy the client so we open
 23 the main entrance lobby for residents, however
 24 I understand that the client needs to agree this as
 25 you'll need to visit again once all systems are fully

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1 commissioned."
 2 Do you see that there?
 3 A. Yes.
 4 Q. What did you mean by "to satisfy the client" there?
 5 A. Satisfy the client that the entrance lobby was safe to
 6 open. So I think the one on 4 February we talked about
 7 earlier was like a pre-visit, "This is what I'm going to
 8 need off you", so then we obviously in the month after
 9 that done a load of work in terms of -- as I say, if
 10 I remember correctly, I think we opened the entrance
 11 lobby on 17 March, so we were very close to being ready,
 12 and we were trying to get everyone's approval that it
 13 was ready to let residents through.
 14 Q. What I want to ask you about now is some comments
 15 Mr Stokes has made about what he was told about the
 16 cladding.
 17 A. Yeah, okay.
 18 Q. So I want to look at his witness statement. This is at
 19 {CST00003063/42}, and I want to look at paragraph 120.
 20 He says this:
 21 "When inspecting the Tower in April 2016, I spoke to
 22 various people, including representatives from Rydon,
 23 however I cannot now remember exactly who I spoke to on
 24 this occasion. As I had noted the isolated test
 25 cladding panel when visiting the Tower in 2014, and in

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1 particular the timber battens that were being used at
 2 that time, I asked about how the cladding had eventually
 3 been fixed to the Tower. As can be seen from my
 4 handwritten notes, following discussions with
 5 representatives of Rydon, I recorded 'OK FR No Timber'
 6 and 'Cladding external Non Combustible Metal Fixings
 7 signed off by B/C'. I do not remember the precise
 8 conversations I had, however my understanding on leaving
 9 the Tower after my inspection was that the actual
 10 cladding was compliant with the Buildings Regulations
 11 and that the obvious presenting issue (the timber
 12 battens) had been dealt with as metal fixings were now
 13 being used. In addition, as far as I was concerned, if
 14 the cladding itself and the system by which it was fixed
 15 to the building had been passed by Building Control, the
 16 system and component parts would have been compliant
 17 with the requirements of the Building Regulations and
 18 ADB. That is what I meant by reference to the 'new fire
 19 rated cladding' in the April and June 2016 FRAs [fire
 20 risk assessments]."

Do you see that there?

22 A. Yes.
 23 Q. Now, Mr Stokes is referring there to initially these
 24 notes that he made, "OK FR No Timber" and "Cladding
 25 external Non Combustible Metal Fixings signed off by

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1 B/C".
 2 Do you recall any discussions you had with Mr Stokes
 3 during his visits in April 2016 about those topics?
 4 A. Specifically, no, I don't remember, but if he says we
 5 did, we did. But the same as him, my understanding was
 6 that it had been passed by Building Control and the
 7 system and component parts were compliant with
 8 Building Regulations. So if I confirmed it to him,
 9 that's because that's what my understanding was.
 10 Q. Do you have a specific recollection, though, of
 11 discussing the fixings?
 12 A. No, but he says that -- yeah, it says no timber, and
 13 I would have definitely confirmed to him that there was
 14 no timber in the system and that metal fixings were
 15 being used. I don't remember specifically going into
 16 fire rating or anything like that. But same as him, my
 17 understanding was that that system was compliant.
 18 Q. He says in the last part of that paragraph that, as far
 19 as he is concerned, if the cladding itself and the
 20 system by which it was fixed to the building had been
 21 passed by Building Control, the system and component
 22 parts would have been compliant with the requirements of
 23 the Building Regulations.
 24 Did you ever have any discussion with him about
 25 whether the cladding had been passed by

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1 Building Control?

2 A. Not specifically, but at the time he's talking about,

3 I've struck every single mast climber around the

4 building and we had 20 floors of finished cladding

5 there, so I would say that was signed off by

6 Building Control. But specifically in terms of, yeah,

7 actually Building Control saying, "Yes, it's compliant",

8 no, I have no recollection of saying that to him.

9 Q. He says that:

10 "... my understanding on leaving the Tower after my

11 inspection was that the actual cladding was compliant

12 with the Buildings Regulations ..."

13 Did you ever have that specific discussion with

14 Mr Stokes?

15 A. I don't remember having that specific thing.

16 Q. Would it have been you that he was having these

17 discussions --

18 A. It would have been me if I had, yes, because I was the

19 one at that point who mainly dealt with Carl when he

20 came on site.

21 Q. What about Mr Stokes asking you what the nature of the

22 cladding materials at Grenfell were?

23 A. I don't remember specific conversations, I'm sorry,

24 I don't.

25 Q. So you can't remember a conversation where you might

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1 have referred to fire rated cladding --

2 A. No.

3 Q. -- or talking about the fire performance of the

4 cladding?

5 A. No.

6 Q. Is that that you can't recall having those conversations

7 or that you actually think you didn't have those

8 conversations with him?

9 A. I don't know. As I said to you earlier, I have a lot of

10 conversations with an awful lot of people, that's my

11 job, or it's a big part of my job, so I'm afraid I don't

12 remember the specifics of every single conversation.

13 Q. Yes.

14 A. But if he said that he took it from that thing, that it

15 would have been with me, I can confirm that.

16 Q. Yes. Just one last set of questions on this topic, and

17 then we might pause for a break.

18 So I want to take you to an email thread that you

19 weren't copied in to, but I want to see if it triggers

20 any recollection for you. This is at {CST00002764} and

21 this is an email thread of 24 April 2017.

22 Now, the genesis of this email chain is that the LFB

23 had sent the TMO a letter, just so you understand, dated

24 6 April 2017 about external cladding and glazing

25 following the Shepherds Court fire.

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1 A. Okay.

2 Q. So the TMO had got a letter about that fire, and I want

3 to pick this up at the bottom of page 1. So

4 Janice Wray, we can see, at 9.34 asks Carl Stokes, she

5 says:

6 "Carl

7 "My understanding is that we do not have any blocks

8 with external cladding of this nature. Are you able to

9 confirm please?

10 "I need to write back to the Director of Housing and

11 I think you are probably best placed to advise me on

12 the construction of our blocks."

13 Do you see that?

14 A. Yes.

15 Q. Then if we look at his response to that, we can see that

16 he says on 24 April 2017 at 12.20:

17 "As far as I know that is correct.

18 "Grenfell was clad but the cladding complied with

19 the requirements of the Building Regulations, lots of

20 questions asked of Rydons and answers received back from

21 them."

22 Do you see that there?

23 A. Yes.

24 Q. Now, do you remember Mr Stokes contacting you at this

25 time, at any time in 2017 or April 2017, and asking you

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1 questions about the cladding?

2 A. No, I had no correspondence with Carl after I left

3 Grenfell.

4 Q. Would you say that the exchanges you had had with

5 Mr Stokes in 2016 resembled "lots of questions asked of

6 Rydons and answers received back from them"?

7 A. Well, there was lots of queries in the fire risk

8 assessment, so you could say that was lots of questions.

9 Q. Yes.

10 A. But I also would have expected that he would have talked

11 to the earlier site team as well. He had been down to

12 Grenfell prior to my involvement a number of times,

13 I knew that.

14 Q. So he may have spoken to people before you got to site?

15 A. He may have asked lots of questions then as well. So,

16 over the duration, he did ask lots of questions, but ...

17 MS GRANGE: Mr Chairman, I think that's a good moment for

18 a break.

19 SIR MARTIN MOORE-BICK: Yes, so do I, thank you.

20 We will have a short break now, Mr Hughes.

21 If we say 3.25, will that be all right for you?

22 MS GRANGE: That's fine, yes.

23 SIR MARTIN MOORE-BICK: Please remember not to talk to

24 anyone else about your evidence or anything to do with

25 the refurbishment, and if you would like to go with the

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1 usher, we will resume at 3.25.
 2 THE WITNESS: Thank you.
 3 SIR MARTIN MOORE-BICK: Thank you very much.
 4 (Pause)
 5 Right, 3.25, then, thank you very much.
 6 (3.11 pm)
 7 (A short break)
 8 (3.25 pm)
 9 SIR MARTIN MOORE-BICK: Right, Mr Hughes, are you ready to
 10 carry on?
 11 THE WITNESS: Yes, I am.
 12 SIR MARTIN MOORE-BICK: Good, thank you.
 13 Yes, Ms Grange.
 14 MS GRANGE: Thank you.
 15 Just a follow-up question on Building Control. Can
 16 we look at your witness statement on page 12
 17 {RYD00094213/12} at the bottom of the page. If we look
 18 at the bottom of the page, 61.1. We went through this
 19 in detail previously, you say:
 20 "On 30th October 2015 was my first contact with RBKC
 21 Building Control when I requested a site visit from
 22 John Hoban on 2nd November 2015, so Steve and I could
 23 discuss the project with him."
 24 A. Yes.
 25 Q. Do you see that there?

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1 Then over the page {RYD00094213/13} at 61.2, you
 2 say:
 3 "I requested that John Hoban visit site to inspect
 4 the cladding on 11th November 2015 ..."
 5 Do you see that there?
 6 A. Yes.
 7 Q. Going back to 61.1 {RYD00094213/12}, was there
 8 a separate visit from John Hoban on 2 November 2015, ie
 9 before the one on 11 November 2015?
 10 A. Yes, I believe he turned up the day after, I believe he
 11 turned up on 3 November. He didn't turn up when Steve
 12 and I was there, but he turned up the next day.
 13 Q. I see. So did you meet him on that day?
 14 A. Yes.
 15 Q. When you say he didn't turn up when Steve --
 16 A. No, so I requested he turn up on the 2nd -- sorry, I got
 17 my -- but I remember him coming to site the day after.
 18 Q. Yes.
 19 Can we look at a document, {RBK00003041/4}. There,
 20 in the middle of the page, these are some notes we've
 21 got from RBKC's system. It says, 2 November 2015:
 22 "Cladding inspection and meeting with new project
 23 manager."
 24 So is what you're saying that that didn't happen on
 25 the 2nd but it happened on the 3rd?

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1 A. Sorry, my recollection is wrong then, he must have
 2 turned -- I didn't think he met with me and Steve, so he
 3 might have not turned up when -- Steve might have left
 4 site at that point, so then that was one -- and yes,
 5 he's saying that he met with me, although, as I say,
 6 I was never the project manager.
 7 Q. Can you help us as to what was discussed at that
 8 meeting?
 9 A. No, I'm afraid I can't.
 10 Q. No.
 11 A. I can't remember. It would have been sort of
 12 an introduction, have a quick walk round with him and
 13 just check whether he was okay.
 14 Q. And you can't remember whether the cladding system
 15 specifically was discussed?
 16 A. No, specifically no.
 17 Q. Okay.
 18 Moving on, then, just a few questions about fire
 19 doors. Can we go to a document {RYD00078593}. I want
 20 to look at an email at the bottom of page 1 and on to
 21 page 2 {RYD00078593/2}. You there send Mike Brown of
 22 Rydon -- you are attaching the "Grenfell Tower
 23 Significant Findings and Action Plan April 2016", and
 24 you say:
 25 "Mike

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1 "Client FRA & Rydon comments as discussed.
 2 "Biggest thing is to prove FD30 to riser cupboards."
 3 Do you see that there?
 4 A. Yes.
 5 Q. Can you help us as to what that meant?
 6 A. It was the riser cupboards, or, I described them
 7 earlier, the cupboards on the existing lobby. So from
 8 the 4th all the way up to the 24th floor, it was proving
 9 that those doors were FD30s. There was no markings on
 10 them because I think they had been painted, so we were
 11 trying to find sort of records from who we got them from
 12 that we had been supplied FD30 doors.
 13 Q. If we can then look at your email to Steve Blake on
 14 page 1, you say there at point 1:
 15 "Hi Steve
 16 "Non fire rated doors doesn't make sense for
 17 following reasons:
 18 "1. We fitted smoke seals into doors."
 19 Can you help us as to what doors you're referring to
 20 there?
 21 A. Same doors, so talking about the -- on each of those
 22 riser cupboards, from the 4th through to the 23rd --
 23 sorry, not the 24th -- there was two doors. So I'm
 24 talking about those doors and the new riser cupboards,
 25 the ones that Rydon's built.

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1 Q. After the numbered points, there is a sentence that
 2 says:
 3 "John Hoban stated on last walk around that doors
 4 including cupboards off protected lobbies must be fire
 5 rated."
 6 Do you see that there?
 7 A. Yes.
 8 Q. Now, can you help us: did Rydon ever carry out any works
 9 to the stairway doors, the doors between the stairs and
 10 the lobbies, on levels 4 to 23?
 11 A. The only works we did was paint them.
 12 Q. Right, okay. So did you fit any smoke seals to these
 13 doors?
 14 A. No, we didn't, that was done by the client's
 15 contractors -- or, sorry, KCTMO's contractors.
 16 Q. Which contractors were they?
 17 A. I don't know, it was done prior to my time, but I know
 18 there was some records, emails on the system about it
 19 because the contractors had left it in a right mess and
 20 all the residents thought it was to do with us, but it
 21 wasn't. Sorry, by "us" I mean Rydons.
 22 Q. I see. So Rydon didn't do any work at all --
 23 A. No.
 24 Q. -- to any of those stair doors?
 25 A. Apart from painting them.

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1 Q. Okay.
 2 I now want to ask you some questions about the
 3 health and safety file.
 4 Now, we've looked at the question of fire risk
 5 assessment, and can we call up again the record of
 6 significant findings and action plan dated
 7 26 April 2016. This is at {RYD00094315/3}. I want to
 8 look at the first item in the third column. So here
 9 what we see is on "Identified risk or hazard", third
 10 column on the left, it says:
 11 "When the construction/refurbishment work is
 12 completed on this building all information as required
 13 by the Building Regulations must be handed over to the
 14 TMO by the contractors before they hand over the areas
 15 now under their control."
 16 Do you see that there?
 17 A. Yes.
 18 Q. If you look in the next column along on the right, under
 19 item 2 it says:
 20 "All the Regulation 38 information as required by
 21 the Building Regulations."
 22 A. Yes.
 23 Q. Do you see that? It's marked as a high priority in the
 24 second red column.
 25 Were you aware at the time of the requirements of

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1 regulation 38 of the Building Regulations to provide
 2 fire safety information to the responsible person?
 3 A. No, but I was aware that we had to hand over a health
 4 and safety file and O&M file to the client at the end of
 5 the job.
 6 Q. So you didn't know what your separate duties might be
 7 under regulation 38?
 8 A. No.
 9 Q. If it was anyone's responsibility, was that your
 10 responsibility within Rydon to ensure that fire safety
 11 information was passed to the client?
 12 A. No, I wouldn't say it was, I would say it's the whole
 13 team's responsibility to pass it on.
 14 Q. Right.
 15 A. But as -- well, I think we talked about it, we employed
 16 a specialist to do the O&M for us, provided all the
 17 information to him.
 18 Q. Within Rydon, were you responsible for overseeing the
 19 production of the operation and maintenance, O&M,
 20 manual?
 21 A. No, but I helped a lot with it. I don't know if you're
 22 aware, but we contracted a company called
 23 All Group Holdings to do the O&M file and health and
 24 safety file for him. It was part of his contract to
 25 obtain the information and compile it in a way that the

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1 client wanted. But my agreement was -- there was
 2 an awful lot of things we had on our files. So, like,
 3 snagging sheets had to go into it. There were certain
 4 things he wouldn't get from anyone else apart from
 5 Rydons. So I sent over the documents that we had in our
 6 system, and I also said that, "If you struggle with any
 7 contractors, let us know as soon as you can and we will
 8 give them a little gee up as well".
 9 Q. I think you began that answer, when I asked you were you
 10 responsible, with a "No, but I helped a lot with it".
 11 A. Yes.
 12 Q. If not your responsibility, who else within Rydon was
 13 responsible for making sure --
 14 A. Since this is a contract, in my mind it would be for the
 15 contracts manager to do that.
 16 Q. I see. So that would be Steve Blake by this time?
 17 A. Yes.
 18 Q. Now, as you have explained already, we know that
 19 All Group Holdings were asked to provide and produce
 20 an O&M manual and a health and safety file for
 21 Grenfell Tower. What steps did you take to ensure that
 22 the file was properly completed?
 23 A. When -- as I say, it took a long time to do it, I think
 24 over about four months it took to compile the thing and
 25 get all the information together, and I know at one

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1 point I got one of the drafts and I had a quick look
 2 through it. At the time, I didn't note any issues with
 3 it, but I never saw the finished file. It was handed to
 4 Claire Williams by Steve Butler, I think, from
 5 All Group Holdings, and, as I say, at the time she had
 6 the principal design or principal designer --
 7 Q. I see. How were All Group Holdings going to collate the
 8 information that it needed, did you know?
 9 A. Well, in line with the -- I'm pretty certain they had
 10 the contract document which set out what needed to go in
 11 it. We set out the -- well, we sent them, so they could
 12 give us a quote, the relevant section of the -- sorry,
 13 the NBS specification, I was about to say the ERs, but
 14 the NBS specification, the relevant sections that he
 15 needed to find out what he needed to get off the
 16 contractors.
 17 Q. I see. So you expected All Group Holdings to then
 18 liaise with the subcontractors to get that information?
 19 A. Yes, yeah. I did have a couple of meetings with them
 20 along the way, sort of checking on progress, so
 21 I certainly was involved in the meeting with him and
 22 Claire as well. Obviously ultimately we were trying to
 23 satisfy Claire that she had all the information that she
 24 needed.
 25 Q. At the end of the process, did you take steps to satisfy

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1 yourself that the O&M manual that was presented to the
 2 TMO was the complete manual?
 3 A. I never saw the completed manual. It got handed to
 4 Claire, I think, by thumb drive.
 5 Q. Do you know why you never saw it?
 6 A. Just never got a copy of it, or it never went on our
 7 systems, so ...
 8 Q. Did you understand that there were requirements in the
 9 CDM regulations for the preparation of a health and
 10 safety file?
 11 A. Yes, as I said, I am aware that one of our sort of
 12 contractual obligations is to supply an O&M file and
 13 a health and safety file at the end of a contract.
 14 Q. Did you know what that file had to contain?
 15 A. Well, anything relevant or as set out in -- sorry,
 16 I keep calling them the ERs, as set out in the
 17 specification.
 18 Q. I see. So you didn't look at a particular document or
 19 guidance to help you as to what it should contain?
 20 A. No, I would expect what was in the specification was --
 21 would be what was required.
 22 Q. Now, two copies of the health and safety file have been
 23 provided to the Inquiry, one from Rydon and one from the
 24 TMO. The Rydon version has a section 4, health and
 25 safety file, but this section contains no information,

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1 whereas the TMO version contains an index that we'll
 2 look at in a moment.
 3 Can you help us as to why there might be two
 4 versions of the health and safety file that are
 5 different, one from Rydon --
 6 A. As I said, I got an earlier draft of it and that would
 7 be the one which was on our systems, so that would be
 8 the one that I had a look at, but I believe the O&M
 9 files actually got handed to Claire after practical
 10 completion and it was given to her on a thumb drive, but
 11 I never got a separate thumb drive so I could copy it on
 12 to our system.
 13 Q. Can we look at {MET00065979}. This is an email of
 14 23 May 2016. So this is from Steve Blake to Neil Reed,
 15 and you're copied in. It says:
 16 "We are all working towards a partial
 17 possession/handover date 27/5/16 which is 4 days
 18 away ..."
 19 Then you can see towards the bottom, just before the
 20 end of the email:
 21 "The O+M drop box(sic) link will be provided later
 22 today."
 23 Do you see that?
 24 A. Yes.
 25 Q. Is it possible that, because partial possession and

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1 handover was contemplated, there was an earlier draft
 2 but incomplete version of the O&M manual, and then later
 3 a second full version after full practical completion?
 4 Is that possibly the reason why we see two different --
 5 A. Possibly. I don't know if that's absolutely correct or
 6 whether it was just -- as I say, we started work on it
 7 back in I believe April sort of time, and we had
 8 a partial copy from Steve Butler.
 9 Q. Can we look at a document which is the contents page for
 10 the health and safety file. This is {TMO10013708}. So
 11 this is the contents page for the health and safety file
 12 which was included in the building manual.
 13 Can you remember seeing this before?
 14 A. As I said, I only looked at the draft version, which
 15 would have been probably, as you say, around about March
 16 time, so no, and I didn't look at it in great detail.
 17 Q. No.
 18 We can see from an email on 27 June 2016 that you
 19 were copied in to this contents page.
 20 A. Yeah.
 21 Q. Can you see that it includes cross-references to other
 22 parts of the building manual?
 23 A. Yes.
 24 Q. Do you see that there?
 25 A. Yes.

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1 Q. Did you ever check those cross-references?
 2 A. No.
 3 Q. Were you aware of guidance supporting the
 4 CDM Regulations which explains what a health and safety
 5 file should and shouldn't include?
 6 A. Specifically as to exactly what it should include, no,
 7 I am not aware, but I am aware that it is a contractual
 8 obligation to supply it.
 9 Q. If we look there at B1 under "Architectural Design", it
 10 says, "Architects As Built Drawings", and then it says:
 11 "Please refer to the Drawings located in the
 12 Building Manual - Part 2 - Section 2.1.2.2."
 13 Do you see that?
 14 A. Yes, I do, yeah.
 15 Q. Then if we can look at {TMOM00000001}, this is the
 16 contents page for the building manual, and if we go to
 17 page 9 {TMOM00000001/9}, which is section 2, what we see
 18 is there is no 2.1.2.2. It's not there and it's not
 19 over the page, if you look over the page
 20 {TMOM00000001/10}. So that cross-reference appears to
 21 be wrong.
 22 Did you notice that at the time?
 23 A. No, I did not.
 24 Q. Did you ever check points like that to check that it --
 25 A. No, I remember looking at it very briefly but not going

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1 over it in great detail.
 2 Q. Now, in its investigations we have discovered that the
 3 Rydon version of the O&M manual was edited on
 4 14 June 2017, that's the night of the fire. We can look
 5 at the metadata.
 6 If we can go to {BLARP20000006/208}. If we can blow
 7 up that top box, this is figure 17.1, and what we can
 8 see is that the metadata for the manual has been
 9 accessed, and it says "Created: 14/07/2017". Do you see
 10 that there?
 11 A. Yes.
 12 Q. Were you aware of the O&M manual being accessed or
 13 edited that day?
 14 A. I was in the office on the day of the fire, so I was
 15 outside Steve Blake's office, and on the day of the fire
 16 I -- as I say, it is very blurry that day, but I know
 17 I had a meeting with the health and safety department
 18 where I was asked to get the relevant documents and we
 19 transferred them to a new part of our system. So
 20 I think Simon O'Connor talked about this, there is
 21 an M drive, but there's also on Rydon's a filing system
 22 called the RWay system, which was a newer system, and
 23 that's what the majority of the company worked off at
 24 the time.
 25 So the meeting I had, health and safety team asked

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1 me to sort of get the relevant documents, and one of the
 2 first ones I got was the O&M file and I copied it across
 3 to the RWay system. I don't know if that is the reason
 4 why it looks like there's a new creation.
 5 Q. Yes, that helps.
 6 Did you do anything with the contents of the file?
 7 A. No.
 8 Q. No, you just saved it over on to --
 9 A. Well, yeah, just copied it over from one part of our
 10 system, the old part of our filing system, to the new
 11 part of our filing system.
 12 Q. Yes, that's helpful.
 13 So just one last question on this topic. If we can
 14 go to {ART00005362}, these are some meeting minutes from
 15 23 February 2016, progress meeting 20, and we can see
 16 you're present.
 17 If we can go to item 2.20 on page 4 {ART00005362/4},
 18 we can see that there's an action there about fire
 19 protection works to start with:
 20 "... nothing further is to be progressed other than
 21 the remedial works required of the CoW in relation to
 22 Rydon's own works."
 23 Then if we keep going down:
 24 "Carl Stokes will produce a report in the form of
 25 the Fire Risk Assessment ..."

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1 At the end:
 2 "NR requested that this be included in the H&S File
 3 (CDM) on Completion as formal recognition of a fire risk
 4 shortfall and potential 'residual risk' arising from the
 5 building in its previous form."
 6 Do you see that?
 7 A. Yes.
 8 Q. Do you know whether the health and safety file was ever
 9 updated to include this?
 10 A. No, I don't, but I also think that what Carl Stokes is
 11 talking about is what we talked about earlier, which is
 12 the holes through the existing riser cupboards which we
 13 fire proofed.
 14 Q. Yes.
 15 A. So there was no -- and we also did something very
 16 similar down in the main electrical cupboard as well,
 17 fire proofed some existing holes. So where we saw
 18 issues with compartmentation, we fixed them.
 19 Q. Yes.
 20 I now just want to ask you a few brief questions
 21 about the smoke control system and the related interface
 22 panels.
 23 So in your statement you say that you ran a tour for
 24 the local Fire Brigade on 26 July 2016 at which you
 25 showed them the operation of the human mechanical

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1 interface, HMI, panel for the smoke extract system and
 2 the automatic opening vents in the lobby areas. You
 3 discuss this at paragraphs 92 and 93 of your witness
 4 statement on pages 21 {RYD00094213/21} and 22
 5 {RYD00094213/22}. So that's where you say that you ran
 6 familiarisation tours. You talk about the TMO in 91 and
 7 then the tour for the Fire Brigade on 26 July 2016 in
 8 92.

9 Now, is this HMI, human mechanical interface panel,
 10 the main control panel for the smoke extract system in
 11 the lobby?

12 A. Yes, the one in the lobby, yes.

13 Q. Can you remember how you demonstrated the operation of
 14 that HMI panel and the AOVs for the Fire Brigade?

15 A. No, I don't remember specifically, but I knew it was
 16 a fairly simple system that I obviously had -- well,
 17 I got to learn how it worked through -- with -- sorry,
 18 with JSW and PSB, so it was quite a simple one. I think
 19 I just showed the Fire Brigade the very simple thing,
 20 and there was a little instruction manual to the side
 21 and it sort of explained that. Because -- as I say, to
 22 the side there was a little instruction manual which
 23 related the numbers on the panel to the levels that the
 24 AOVs were on in the building, so the floor levels.

25 Q. Right, yes, I see, and was the smoke extract system and

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1 the AOVs working during the tours that you did?

2 A. Yes.

3 Q. Were the LFB provided with instructions as to the
 4 operation of that smoke extract system, to your
 5 knowledge?

6 A. To my knowledge, no.

7 Q. If we can look at paragraph 118 of your witness
 8 statement on page 26 {RYD00094213/26}, you say at this
 9 point:

10 "I was involved in the 'End of Defects' (EOD)
 11 inspection at the end of May 2017, about two weeks
 12 before the fire. It was arranged with Claire Williams
 13 and was booked for two full days. On 30th May 2017,
 14 I walked round with Claire Williams, Tom Bishop, Rydon
 15 site agent, and on the 1st June 2017, Gary Martin, site
 16 manager, joined us."

17 Do you see that there?

18 A. Yes.

19 Q. Then you tell us in 119:

20 "The reason for an EOD [end of defects inspection]
 21 is to revisit all of the building works at the end of
 22 the 12 month defect period, to see if any work is
 23 defective and requires repairing, with the aim of
 24 creating one definitive list of defects. When all
 25 defects have been rectified, inspected and approved or

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1 signed off by the client's representative, then
 2 responsibility for any further issues is the client's."

3 Do you see that there?

4 A. Yes, I do.

5 Q. Then looking at paragraph 121 of the statement,
 6 {RYD00094213/27}, you say in the first few lines there:

7 "It was during the walk-round of the communal
 8 lobbies on the upper floors on 1st June 2017 that
 9 I noticed that the environmental function of the smoke
 10 extract system was not working."

11 Do you see that there?

12 A. Yes.

13 Q. When you realised that, did you think to yourself: well,
 14 if the environmental aspect of that system is not
 15 working, then there might be a problem with the smoke
 16 control aspect of that system?

17 A. Yes, I did think that.

18 Q. You also say that you went -- this is in the next few
 19 lines:

20 "I checked the main control panel, with Claire
 21 Williams present, and noticed that it did not appear to
 22 be showing that any vents were open."

23 Do you see that there?

24 A. Yes.

25 Q. Is that the same HMI panel that you demonstrated --

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1 A. Yes.

2 Q. -- to the Fire Brigade and others? Yes.

3 Had the HMI panel previously shown, if it was
 4 working, that the vents were open?

5 A. If the vents were open it would show on the panel.

6 Q. Yes. So you could see that on this occasion, and you
 7 say that Claire Williams of the TMO told you that
 8 a company that was going to take over maintenance of the
 9 smoke extract system had come to look at it two weeks
 10 previously and had set the system off; do you see that
 11 there?

12 A. Yes.

13 Q. What was Claire Williams' reaction to this discovery
 14 that the environmental system wasn't working and that
 15 none of the vents were showing as open on the panel?

16 A. What I remember is Claire was also shocked because
 17 I don't think it was Claire that had called them in. My
 18 understanding was KCTMO -- as I said -- sorry, go back
 19 a stage. In the defects, once that building is handed
 20 over and we've proved we've done everything or all the
 21 outstanding defects which have occurred in the last
 22 year, then it's KCTMO's responsibility. KCTMO, from my
 23 understanding, were starting to line up contractors to
 24 carry on the maintenance and servicing of Grenfell.

25 Q. Yes.

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1 A. So I think somebody jumped the gun trying to get them
 2 in, but I do remember Claire being -- sort of saying
 3 that she was shocked because it wasn't her who called
 4 them in.
 5 Q. Did she seem to understand the potential significance of
 6 the system not working in terms of the smoke control
 7 system?
 8 A. I understand that Claire would be, yeah, rightly
 9 worried. But also, it's come to light afterwards that
 10 it might not have been such a big thing anyway, because
 11 it was a really hot day when we done that walk-around,
 12 and the environmental system also had a shut-off system
 13 on it, which if the air outside is hotter than the air
 14 inside, then it wouldn't work, it wouldn't basically
 15 bring in hotter air. The idea was to keep the lobby
 16 areas cooler. So if it was hotter outside than it was
 17 inside, it wouldn't bring the air in, and it was
 18 a really hot day that we done our -- sort of the
 19 two days we did the walk-around were hot days, so --
 20 Q. Right. Did you have that thought at the time, that that
 21 might be the reason?
 22 A. I didn't have that thought at the time. My worry at the
 23 time was that it didn't look to be working. I would
 24 expect it -- I think I -- I don't know whether -- it's
 25 hard to explain, but it didn't work on every floor at

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1 every time, so it went through a rotation --
 2 Q. Sorry, do you want to just slow down a little bit.
 3 I think we got to -- you said it wasn't going to work on
 4 every floor at every time; is that right?
 5 A. Yes, okay. It worked on a rotation system, so it would
 6 do, if I remember, every five floors at a time, and then
 7 it would work for 15 minutes, then it would move up
 8 a rotation.
 9 Q. Yes.
 10 A. So, yeah, and like I said, it only worked -- it also had
 11 a temperature sensor outside that if the air outside was
 12 hotter than the air inside, it wouldn't work, because
 13 all you'd be doing was bringing hotter air in, and that
 14 wasn't the purpose of the system. But I think, like
 15 I say -- I think I also say that I wasn't sure because,
 16 in terms of me walking round, we were also that day
 17 going in and out of flats looking at any defects inside
 18 the flats, but I might have happened to miss the
 19 rotation.
 20 Q. Did you explain to Ms Williams at this time the
 21 relationship between the environmental system and the
 22 smoke control system?
 23 A. At the time, I don't think I did, but I would hope that
 24 Claire was aware of what we had done, because obviously
 25 we had done the work a year earlier and it was part of

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1 our specification.
 2 Q. Now, you go on in your statement to explain that you
 3 were sufficiently concerned that you reported the
 4 malfunction to JS Wright's aftercare department. That's
 5 right, isn't it, you phoned it through to JS Wright's
 6 aftercare team? Can you recall, what was JS Wright's
 7 response when you did that?
 8 A. Same as every time I phoned them up, that they would get
 9 it organised as quick as possible.
 10 Q. Yes.
 11 A. And I'm pretty certain they asked me to send over
 12 an email and I sent over an email and sent some photos.
 13 Q. Yes. We can see that. If we go to {RYD00094213/64},
 14 there is an email you sent on 1 June to their aftercare
 15 department, where we can see you're saying:
 16 "Further to my e-mails about defects at Grenfell,
 17 the environmental mode on the AOV system is not working.
 18 I walked all 24 floors on Tuesday and it was not
 19 operating on any floor."
 20 Do you see that? We can see from the attachments
 21 that you are sending photos.
 22 Do you know whether JS Wright followed up on the
 23 defect report?
 24 A. I now know they didn't, but at the time I had no reason
 25 to suspect that they wouldn't because JSW had the best

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1 aftercare department that I have ever worked with.
 2 In fact, there was a couple of times in the year
 3 previously that I'd gone up there and phoned through
 4 a defect and somebody had arrived an hour later.
 5 Q. Did you ever check whether they had attended to the
 6 matter or somebody else had attended to the matter?
 7 A. No, I didn't.
 8 Q. Did you ever contact Claire Williams again to emphasise
 9 the importance of this issue?
 10 A. No, I didn't.
 11 Q. Did Claire Williams subsequently contact you about the
 12 system?
 13 A. No, she didn't.
 14 Q. Now, we know that that was, I think, your last visit to
 15 Grenfell Tower, wasn't it?
 16 A. Yes.
 17 Q. 1 June 2017.
 18 Can we turn to a document, {RYD00086541}. I think
 19 this was your weekly defect update report for
 20 Grenfell Tower.
 21 I want to look -- I know it's quite a small font
 22 here, but look at line 6 in the main text. There is
 23 a line that says, "AOV system not working properly" that
 24 you can see in the description. Do you see that there?
 25 A. Yes, I can.

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1 Q. You have got "Service By: JS Wright" in the next column.
 2 It's created on 1 June 2017, and then you have got
 3 a target complete date of 29 June 2017. Do you see that
 4 there?
 5 A. Yes.
 6 Q. Can you explain why that target complete date was
 7 28 days after the defect had been logged?
 8 A. No. This -- as I say, this document is dealt with by
 9 our Rydon's aftercare department and they're obviously
 10 given response times as per the contract. I don't
 11 understand why it was given a date that thing -- that
 12 long.
 13 Q. Did you not think that it needed to be dealt with more
 14 urgently than in 28 days?
 15 A. I never saw this document, and, as I said, every other
 16 one I had ever phoned through to JSW was dealt with very
 17 rapidly.
 18 Q. Okay.
 19 Final topic for my questions, Mr Hughes. I just
 20 want to ask you about snagging of broken and draughty
 21 windows.
 22 To what extent were you made aware during your time
 23 on the project, or indeed after when you went back to
 24 Grenfell Tower, that there were complaints being made
 25 about gaps around the windows?

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1 A. I did visit a couple of flats and felt a bit draughty in
 2 a few places.
 3 Q. So you agree that you did receive some complaints about
 4 draughty windows?
 5 A. Yes, and I visited a couple of flats as well, as I say,
 6 afterwards and during the works as well.
 7 Q. Can we look at just two emails on this. So if we go to
 8 {HAR00017538}. This is someone called Emma Kelly of
 9 Rydon to you. Sorry, to be fair, it's to Ben Bailey and
 10 Ray Bailey but copying you in. She says:
 11 "It has been noted that there is a large number of
 12 defects relating to windows open on our system, some of
 13 which have been open as long as August. This is not
 14 acceptable and we are not receiving any response from
 15 our chaser emails/calls. We must ensure that defect are
 16 closed out within the target rectification time
 17 provided."
 18 Do you see that there?
 19 A. Yes, I do.
 20 Q. Were you concerned at this point about the quality of
 21 the window installation?
 22 A. The quality of the window itself, no, I wasn't, but
 23 I asked -- Emma I think phoned me and said sort of, "Can
 24 you possibly give the Baileys sort of a chase because we
 25 have got this outstanding and things". I said to copy

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1 me into it. I don't remember, but I think I also asked
 2 Steve because Steve had the better relationship to
 3 Harleys to say they need to come and sort this out.
 4 Q. Did any of the concerns that were raised about the
 5 quality of the window installation ever trigger in you
 6 a thought about whether the fire safety of those windows
 7 might be adequate?
 8 A. No, they didn't.
 9 Q. Can we look at another document. This is a bit later.
 10 So that was January 2017, I want to look at May 2017.
 11 This is {RYD00086363/2}. There is an email from
 12 Lee Chapman to Ben Bailey dated 14 May. We can see it's
 13 about flat 195.
 14 We can see about four paragraphs down it's said:
 15 "Under the window sill in the kitchen I can get my
 16 fingers underneath, probably about a 10mm gap, then a
 17 5mm gap up the side.
 18 "In the living room, there are 3 windows."
 19 And again, there's talk of gaps:
 20 "... around 3-4 mm, which gets very drafty (sic) in
 21 windy weather, there is now a finishing stripe and it is
 22 not sealed."
 23 Et cetera.
 24 So we get a sense of that.
 25 Then there are various chasers about this.

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1 Were you made aware of this at the time, that there
 2 were complaints about draughts and gaps around windows?
 3 A. I was aware of a couple of them, yes.
 4 Q. Again, the same question: were you not concerned about
 5 the quality of the installation of the windows upon
 6 being made aware of this kind of complaint?
 7 A. It did raise some concerns with me, but I was concerned
 8 at the time that it was -- I keep using my hands to try
 9 and illustrate, but it was an issue with the support
 10 underneath, because none of the issues were ever around
 11 the sort of top and sides, so I thought if there was
 12 gaps round there we would also be getting reports of
 13 water coming in as well, and we never had one report of
 14 a leaky window at all.
 15 So my understanding -- or what I had in my head,
 16 that there was an issue at the bottom with how the metal
 17 plate which held the windows up wasn't possibly properly
 18 sealed -- as I say, I don't remember actually seeing how
 19 it was done on site, because, like I say, a lot of the
 20 windows were in and insulation underneath them. I never
 21 saw actually how that was finished. So whether or
 22 not -- I had in my mind that there was an issue with the
 23 sealing behind that metal plate or the metal bracket the
 24 window sat on.
 25 Like I say, it was always at the bottom of the

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1 windows; it was never the top and the side. So it was
 2 never a waterproofing issue, otherwise we would have
 3 been getting reports of leaky windows as well.
 4 Q. Okay.
 5 A. So that's the thought process which went through my head
 6 at the time.
 7 Q. Were you ever concerned that issues such as poorly
 8 installed windows might provide a route for fire spread
 9 around the windows?
 10 A. No, I didn't have any concerns.
 11 Q. Did you ever investigate these issues personally?
 12 A. I went into a couple of flats and I did feel the
 13 draughts, and my remedy was to mastic up the gaps from
 14 the inside, because at that stage -- as I say, while we
 15 had the mast climbers up, nobody ever came to me with
 16 an issue, so the issues didn't start appearing until
 17 after the mast climbers had finished or had been
 18 dropped, so it was impossible to get back to the outside
 19 and see what my suspicions -- whether they were true.
 20 So I just dealt with the issue that there was at the
 21 time, which was the draughts, and sealed up all around
 22 the uPVC.
 23 MS GRANGE: Thank you, Mr Hughes.
 24 Mr Chairman, I have come to the end of my questions.
 25 SIR MARTIN MOORE-BICK: Good, thank you.

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1 MS GRANGE: But we obviously need to take the customary
 2 break to see if there are any final questions.
 3 SIR MARTIN MOORE-BICK: Yes.
 4 Well, as you heard, Mr Hughes, those are all the
 5 questions Ms Grange has for you, but we have to have
 6 a pause now just to make sure that there are no further
 7 questions that might need to be put to you. So we are
 8 going to break now until 4.15.
 9 Will that be all right?
 10 MS GRANGE: Yes, that should be fine.
 11 SIR MARTIN MOORE-BICK: And we will come back then and see
 12 if there are any more questions.
 13 THE WITNESS: Okay, thank you.
 14 SIR MARTIN MOORE-BICK: Would you like to go with the usher.
 15 Thank you.
 16 (Pause)
 17 Right, we will say 4.15.
 18 MS GRANGE: Thank you.
 19 (4.03 pm)
 20 (A short break)
 21 (4.15 pm)
 22 SIR MARTIN MOORE-BICK: Right, ready to carry on, Mr Hughes?
 23 THE WITNESS: Yes.
 24 SIR MARTIN MOORE-BICK: I think just a few more questions.
 25 MS GRANGE: Yes, just a few.

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1 Going back to that 2 November 2015 Building Control
 2 visit --
 3 A. Yes.
 4 Q. -- do you remember we looked at that just before, when
 5 we restarted last time? Can you remember whether
 6 Mr Hoban actually went up the hoist and looked at any of
 7 the elevations at that point?
 8 A. No, he didn't. The first time I took him up the mast
 9 climbers was on that first one we discussed, so --
 10 Q. 11 November 2015?
 11 A. Yes.
 12 Q. So not on 2 November 2015?
 13 A. No.
 14 Q. Okay.
 15 A. As I say, I hadn't agreed with him to take him up there,
 16 and it takes an awful long time to go up there and come
 17 back down, so it was something that I had prebooked with
 18 him, that he would need to give us some time to do it.
 19 Q. I understand.
 20 On fire risk assessment and fire risk assessors, did
 21 you generally have experience of fire risk assessors
 22 considering the cladding or external façade of
 23 a building?
 24 A. No, I didn't, because that's probably the first time
 25 that I've really had interaction with a client's fire

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1 risk assessor.
 2 Q. What was your understanding about why Mr Stokes was
 3 asking about the cladding? Did he give you any
 4 reason --
 5 A. It was part of the communal part of the building or the
 6 outside of the building so he was, well, I guess,
 7 informing the client of their risks.
 8 Q. Did he seem to you to have a particular interest in the
 9 cladding?
 10 A. No, he didn't seem to. I always thought he was more
 11 interested on the inside of the building and how it
 12 interacted with residents.
 13 MS GRANGE: Mr Chairman, those were all the follow-up
 14 questions I had. That's it.
 15 SIR MARTIN MOORE-BICK: Well, it was a few questions,
 16 Mr Hughes, wasn't it?
 17 Thank you very much, Ms Grange.
 18 Well, that's all the questions we have for you.
 19 THE WITNESS: Okay.
 20 SIR MARTIN MOORE-BICK: It just remains for me to thank you
 21 for coming to give your evidence. It has been very
 22 helpful to hear you, and you are now free to go.
 23 THE WITNESS: Okay, thank you very much.
 24 SIR MARTIN MOORE-BICK: Thank you very much.
 25 THE WITNESS: Thank you.

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1 (The witness withdrew) 231
2 SIR MARTIN MOORE-BICK: Thank you very much, Ms Grange.
3 That's all for the day, I imagine?
4 MS GRANGE: Yes. Tomorrow Mr Millett will be taking
5 Mr Blake.
6 SIR MARTIN MOORE-BICK: Good. And that will be at
7 10 o'clock?
8 MS GRANGE: That's correct.
9 SIR MARTIN MOORE-BICK: 10 o'clock tomorrow, then, please.
10 Thank you.
11 (4.19 pm)
12 (The hearing adjourned until 10 am on Tuesday, 28 July 2020)
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