

OPUS 2

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Grenfell Tower Inquiry

Day 47

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Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

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

1 Monday, 5 October 2020
 2 (10.00 am)
 3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 4 today's hearing. Today we're going to here from another
 5 member of the conflict of interest office. Yes,
 6 Ms Grogan.
 7 MS GROGAN: Yes, good morning, Mr Chairman, it's John Allen
 8 this morning.
 9 MR JOHN ALLEN (affirmed)
 10 SIR MARTIN MOORE-BICK: Thank you very much, Mr Allen. Do
 11 sit down, please, and make yourself comfortable.
 12 THE WITNESS: Thank you.
 13 SIR MARTIN MOORE-BICK: Yes, Ms Grogan.
 14 Questions from COUNSEL TO THE INQUIRY
 15 MS GROGAN: Good morning. Can you please give the Inquiry
 16 your full name.
 17 A. John Stephen Allen.
 18 Q. Thank you very much for coming to give evidence today
 19 and to assist the Inquiry with its investigations.
 20 I will be asking the questions today, and if you
 21 have difficulty understanding anything I'm asking you,
 22 please ask me to repeat the question or put it in
 23 a different way, and if you feel you need a break at any
 24 point, do just let me know.
 25 Also, keep your voice up so that the transcribers

1

1 can hear you, and instead of just nodding, if you could
 2 answer "Yes" or "No" to any questions.
 3 A. Okay.
 4 Q. You have made two witness statements for the Inquiry.
 5 They're in a folder on your desk just there and they
 6 will also appear on the screen in front of you.
 7 Can I please take you to your first statement, which
 8 is {RBK00033930}. It's dated 25 November 2018, and if
 9 we could turn to page 6 {RBK00033930/6}, is that your
 10 signature?
 11 A. Yes, it is.
 12 Q. For the record, you have also provided exhibits JA/1 to
 13 JA/4 with that statement, and for the transcript only
 14 those references are {RBK00052476}, {RBK00052478},
 15 {RBK00052479}, and {RBK00052480}.
 16 Have you read that statement recently?
 17 A. Yes.
 18 Q. Can you confirm that the contents are true?
 19 A. They are.
 20 Q. You have also made a second statement for the Inquiry.
 21 I'm not going to ask you questions about that today, and
 22 it is formally already in the Inquiry record as it was
 23 referred to in Phase 1 and referenced in the Phase 1
 24 report.
 25 So I'm going to start by asking you some questions

2

1 about your qualifications and experience. You set that
 2 out in paragraphs 1 to 4 of your first witness statement
 3 on page 1 {RBK00033930}.
 4 In summary, you joined RBKC in 1996 as the assistant
 5 district surveyor; is that right?
 6 A. Yes.
 7 Q. What professional experience did you have prior to that?
 8 A. I was previously working at the London Borough of
 9 Ealing, so I've worked for London Borough of Ealing and
 10 for Spelthorne Borough Council. So I started as
 11 a trainee in 1982 -- so you're talking professional
 12 experience rather than academic qualifications, are you?
 13 Q. Yes, your experience in Building Control. Do you have
 14 any academic qualifications?
 15 A. Sorry, can I just finish the last answer?
 16 Q. Sorry, yes.
 17 A. So I started and then worked my way up to area manager,
 18 looking after two area teams at London Borough of
 19 Ealing, from trainee, and then went to Spelthorne
 20 Borough Council in between, but then joined in 1996.
 21 Q. Thank you. And what formal qualifications do you have?
 22 A. So I have a BSc in building surveying, I have a Master's
 23 degree in business administration, and then, I'm sure
 24 you'll come on to it, there was some other technical
 25 qualifications to do with fire risk assessments.

3

1 Q. Could you just set out what those are now?
 2 A. As you're probably aware, there's no qualification for
 3 a fire risk assessor, but there is something called the
 4 fire risk assessment certification scheme that LABC --
 5 I was working for RBKC at the time, but LABC run. That
 6 was through Exova Warrington, I believe. And I was also
 7 a peer reviewer, so I peer reviewed other fire risk
 8 assessors' work as well.
 9 Q. Thank you.
 10 You were special projects manager within RBKC
 11 Building Control from 2009.
 12 A. Yeah, it was special projects and marketing manager,
 13 actually, but yeah.
 14 Q. Then Building Control manager from September 2013.
 15 A. Yes. I was actually appointed in the June 2013, but
 16 there was a handover period, so I formally took over,
 17 I believe it was, on 1 September 2013.
 18 Q. Were you made redundant in June 2017, just before the
 19 fire?
 20 A. I took voluntary redundancy. I can expand on that if
 21 you wish.
 22 Q. Well, what was the reason for taking voluntary
 23 redundancy?
 24 A. Kensington and Chelsea, Camden and Westminster decided
 25 to opt for a tri-borough arrangement, and the two other

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1 heads had already taken voluntary redundancy and I'd
 2 applied for the voluntary redundancy I believe it was
 3 early June 2017, 6 June, and obviously the events
 4 happened and that was then put off. But I was still
 5 given the option to take voluntary redundancy, which
 6 I did, effectively, in the March in 2018, because they
 7 wanted me to carry on over that interim period.
 8 Q. So you actually left your role, then, at March 2018, you
 9 say?
 10 A. I left then. I think officially it might have been --
 11 because I took time off in lieu, so it may have been
 12 July, June/July. I could provide that afterwards, but
 13 around that time.
 14 Q. Thank you.
 15 Are you still working in the Building Control
 16 industry in a similar role now?
 17 A. No.
 18 Q. What is your job now?
 19 A. Don't have one presently. I was -- from May 2018 to
 20 effectively 7 August 2020 I worked for LABC. I started
 21 as a technical specialist in May 2018, and you'll see
 22 there is an overlap there because I was allowed to --
 23 although I carried on, there was time off in lieu and
 24 I could start in May 2018, and then I transferred to be
 25 learning and development lead, so effectively like

5

1 a course tutor for the level 5 diploma.
 2 Q. Thank you.
 3 At the time of the Grenfell refurbishment, you were
 4 a member of RICS.
 5 A. Yes, sorry, I forgot to mention that as well, sorry.
 6 Q. Just for the public, what does RICS stand for?
 7 A. A member of the Royal Institute of Chartered Surveyors.
 8 I believe I have been a member since 1990, so I forgot
 9 to mention that.
 10 Q. At the time, that was a requirement for the role of
 11 Building Control manager, wasn't it?
 12 A. I believe it was. You'd need to check on what the entry
 13 requirements were. I believe a professional
 14 qualification was required, yeah.
 15 Q. Were you a member of any other professional
 16 organisations at the time?
 17 A. I can't recall at the moment.
 18 Q. Prior to the Grenfell Tower refurbishment, did you ever
 19 have experience of working with rainscreen cladding?
 20 A. I would have done. Obviously I have been in
 21 Building Control for a long time, so there's going to be
 22 a lot of buildings. I can't necessarily recall ones
 23 particularly at the moment. But as far as myself
 24 leading projects, in that period, 2009 to 2013, when
 25 I was a special projects manager, that's when I had my

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1 own caseload. Other than that, since probably 1995 I've
 2 managed teams. So although I wasn't hands-on dealing,
 3 you know, day in, day out with a particular project,
 4 obviously I would cover for projects periodically and
 5 also respond to their problems, questions, queries in
 6 that time.
 7 Q. Can you remember any specific special project in your
 8 time at RBKC that may have had ACM rainscreen cladding?
 9 A. I can't, but there may well have been. There was
 10 a number of -- as you're probably familiar, there's --
 11 the regulations don't necessarily differentiate in the
 12 aspects that you're concerned with between refurbishment
 13 and new-build. So I've dealt with many high-rise
 14 residential buildings. I don't believe the most recent
 15 ones did have ACM on them.
 16 Q. Had you ever worked on a project that involved ACM on
 17 a building over 18 metres?
 18 A. Probably, but I couldn't actually say now. There's
 19 hundreds of different projects -- or, sorry, products,
 20 maybe thousands.
 21 Q. What about PIR insulation?
 22 A. Okay. Could you just confirm what you understand that
 23 to be?
 24 Q. So polyisocyanurate insulation.
 25 A. Yeah. So I would be familiar.

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1 Q. On buildings over 18 metres?
 2 A. Probably, I can't recall. I mean, there's -- you deal
 3 with thousands and thousands of different products in
 4 your career as a Building Control officer, so for me to
 5 now try and remember which ones, it would be very
 6 difficult to say so.
 7 Q. What about phenolic insulation?
 8 A. Probably.
 9 Q. Moving on now to your role at RBKC, in terms of your
 10 special projects role between 2009 and 2013 --
 11 A. Yeah.
 12 Q. -- were you dealing with the special projects just by
 13 yourself or were you managing others dealing with them?
 14 A. No, I didn't have any management responsibility.
 15 Q. What is a special project?
 16 A. It's anything that you're given, effectively. So the
 17 role was -- and it's not defined -- the -- it would be
 18 mainly larger projects, so residential, commercial, and
 19 I could give you some examples of the buildings I was
 20 dealing with at the time if it's helpful.
 21 Q. Were they generally more complicated than the ordinary
 22 run of Building Control applications?
 23 A. They would tend to be more complicated and generally
 24 larger in value, financial value.
 25 Q. What qualified you to be the special projects manager?

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1 A. Due to length of experience and qualifications. What
 2 I would also say is there was an element of some of the
 3 projects were given to me by my -- by the head of
 4 Building Control at the time, and then because I was the
 5 marketing manager as well, it was very much about trying
 6 to basically win those projects as well. So searching
 7 leads, trying to do what you can, talk to the
 8 applicants, to try and -- you're aware that
 9 Building Control was in a competitive environment, so
 10 try and win those projects for RBKC. So that was my
 11 role as well.
 12 Q. When you refer there to competition, that's competition
 13 between Building Control operated by local authorities
 14 and approved inspectors; is that right?
 15 A. Yes, because the customers have a choice.
 16 Q. In your role, were you required to have a more advanced
 17 understanding of the Building Regulations and guidance
 18 than a Building Control surveyor or a senior surveyor?
 19 A. You would have to look at the job description. I don't
 20 believe so.
 21 Q. How many special projects would you usually be working
 22 on at any one time?
 23 A. Probably -- maybe 20 to 30. It would be -- there would
 24 be a record, probably. RBKC would have had records,
 25 I don't know if they backdated, but of caseload and

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1 workload, and it would also be easy to look on the
 2 database and see which ones had my name against them.
 3 Q. You were then promoted in 2013 to Building Control
 4 manager.
 5 A. Yeah.
 6 Q. Was that role purely managerial or were you still
 7 dealing with your own caseload?
 8 A. Initially I was dealing with the special projects, and
 9 then I was asked to transfer those projects I had by my
 10 manager at the time to the team.
 11 Q. When were you asked to transfer them?
 12 A. It's -- I have got a note of it. It's around -- so
 13 I took over September. It's sometime between there and
 14 the sort of December 2013, January.
 15 Q. We'll come on to this later in more detail, but we know
 16 that you went to Grenfell for a site visit in
 17 March 2016.
 18 Was it the case that you would fill in for surveyors
 19 from time to time in that way?
 20 A. Yeah, mainly I paired the surveyors up to get cover.
 21 So, like everybody, people have to have leave and are
 22 sick from time to time, so I paired the surveyors up so
 23 they would first of all really talk to their buddy, that
 24 would be the system. But of course there's times in
 25 a small team where you have to cover, and I would do so

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1 if I had to.
 2 Q. So even though your role was managerial, you would still
 3 have to keep yourself up to date so that you could carry
 4 out project work on occasion?
 5 A. Yes.
 6 Q. Just to get the chronology clear early on, from the
 7 documents and witness statements we can see that you
 8 were involved in the Grenfell Tower refurbishment
 9 project first in 2012/2013; is that right?
 10 A. Yes.
 11 Q. Briefly in 2014 around the submission of the full plans
 12 application.
 13 A. Correct.
 14 Q. And then again for the site visit in 2016.
 15 A. Yes.
 16 Q. Moving on now to a new topic, which is the regulations
 17 and guidance at the time.
 18 As a Building Control surveyor with over 20 years'
 19 experience, and head of Building Control from 2013 to
 20 2018, can we take it that you were familiar with the
 21 requirements of schedule 1, part B of the Building
 22 Regulations 2010?
 23 A. Correct.
 24 Q. And you would also be familiar with the guidance in
 25 Approved Document B?

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1 A. Yes.
 2 Q. Did you deal with part B of the Building Regulations and
 3 ADB regularly as part of your role?
 4 A. Yes.
 5 Q. What about parts B3 and B4 specifically?
 6 A. Yes.
 7 Q. In terms of the guidance in ADB on external fire spread,
 8 can we go to {CLG00000173/95}.
 9 So this is a copy of ADB incorporating the 2007 and
 10 2010 amendments. We see there on the right-hand side at
 11 the bottom "External wall construction", paragraph 12.5.
 12 It says there:
 13 "The external envelope of a building should not
 14 provide a medium for fire spread if it is likely to be a
 15 risk to health or safety. The use of combustible
 16 materials in the cladding system and extensive cavities
 17 may present such a risk in tall buildings.
 18 "External walls should either meet the guidance
 19 given in paragraphs 12.6 to 12.9 or meet the performance
 20 criteria given in the BRE Report ... (BR 135) for
 21 cladding systems using full scale test data from BS
 22 8414-1:2002 or BS 8414-2:2005.
 23 "The total amount of combustible material may also
 24 be limited in practice by the provisions for space
 25 separation in Section 13 ..."

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1 Were you familiar with that --
 2 A. Yes.
 3 Q. -- passage of ADB?
 4 Did you understand from this at the time that ADB
 5 contains two potential routes for compliance with the
 6 functional requirement of part B4 of the Building
 7 Regulations?
 8 A. Yes.
 9 Q. At any time during your involvement with Grenfell Tower,
 10 did you know which of these routes was followed?
 11 A. No.
 12 Q. So you were never told?
 13 A. No.
 14 Q. And you never asked?
 15 A. No.
 16 Q. Moving on to paragraph 12.6, which is at the bottom of
 17 page 95, "External surfaces":
 18 "The external surfaces of walls should meet the
 19 provisions in Diagram 40. Where a mixed use building
 20 includes Assembly and Recreation Purpose Group(s)
 21 accommodation, the external surfaces of walls should
 22 meet the provisions in Diagram 40c."
 23 Then we move over the page again to page 97
 24 {CLG00000173/97}, where we see diagram 40, and looking
 25 in particular at 40e. There we see the requirement for

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1 a building that's more than 1 metre from a relevant
 2 boundary, and there's guidance there that, above
 3 18 metres, the external wall surface classification
 4 should be class 0 or B-s3, d2 or better.
 5 Did you know what these classifications meant at the
 6 time?
 7 A. Yes.
 8 Q. Could you elaborate, please?
 9 A. I would -- well, the definition for class 0 and the
 10 others are in the appendix in the approved document, so
 11 I would thumb -- my approved document would be
 12 well-thumbed, and I would thumb to that part of the
 13 guidance and read it. So it's difficult for me to quote
 14 verbatim. You'd be aware that there is a number of
 15 classes and the like within it, but it would be
 16 difficult to quote that now, but if you want to go to
 17 it, I'll happily lead you through it if you wish.
 18 Q. I don't think we need to go to it right now but we might
 19 come back to it later.
 20 At the time, did you have a view of what external
 21 surfaces of walls as referred to in paragraph 12.6
 22 meant?
 23 A. I did.
 24 Q. What was that view?
 25 A. It was very much around the external surface needed to

14

1 achieve class 0, apart from the bit below which you see
 2 in the diagram. Below 18 metres could be class C,
 3 I believe it is.
 4 Q. Would that be just the surface of the product used or
 5 the entirety of the product?
 6 A. Well, if we talk about the weather protection, so just
 7 in sort of simple terms, that is class 0, and then I'm
 8 sure we're going to come on later, the thermal
 9 insulation needs to be materials of limited
 10 combustibility. I don't believe the external skin is
 11 ever regarded -- I know you had an expert here with
 12 insulation background, but I don't believe the external
 13 skin is ever regarded as insulation. And you're
 14 probably aware, apart from the changes to the required
 15 materials to be non-combustible in later versions of the
 16 regulations, you're probably aware that the Government
 17 have changed and added particular clauses into the
 18 description of what the external wall surface is and
 19 also for materials -- or the insulation products,
 20 they've added about the filler in ACM, for example. So
 21 that's an addition they've added to the later Approved
 22 Document B, which is now volume 1.
 23 Q. But at the time, you didn't think that, for example, the
 24 core of an ACM panel would be filler?
 25 A. I regarded that that outside -- if I was asked -- and

15

1 I wasn't asked, but you said what was my understanding
 2 at the time -- if I was asked, I would have said that
 3 the external weathering needed to achieve class 0, and
 4 then the insulation inside, you know, that's pinned to
 5 the inside leaf, would need to be materials of limited
 6 combustibility.
 7 Q. You say there you weren't asked; you mean by the project
 8 team on Grenfell?
 9 A. By anybody. I wasn't asked by my Building Control team
 10 or anybody technically, you know, on the project,
 11 anybody.
 12 Q. Okay.
 13 A. As far as I know.
 14 Q. We'll come back to that later.
 15 In your work as a Building Control surveyor, manager
 16 of special projects, so the earlier period --
 17 A. Yeah.
 18 Q. -- up to 2013, was it your experience that B4 mainly
 19 came up in the context of space separation?
 20 A. No, it comes up wherever it's relevant.
 21 Q. Back to page 96 {CLG00000173/96}, then, of ADB and
 22 paragraph 12.7:
 23 "In a building with a storey 18m or more above
 24 ground level any insulation product, filler material
 25 (not including gaskets, sealants and similar) etc. used

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1 in the external wall construction should be of limited
 2 combustibility ...”
 3 What did you understand the phrase “limited
 4 combustibility” to mean?
 5 A. Well, again, there’s a definition in the appendix, so,
 6 you know, I’d -- I can’t recall the whole of the
 7 document, and it would be wrong -- I don’t think anybody
 8 would have a photographic memory. The important thing
 9 in Building Control is to know where to look. So it’s
 10 know what you know, and if you know it, say it. If you
 11 don’t, look it up. If you don’t know what it is, ask
 12 for help, you know.
 13 Q. Could we just go to the definition. It’s on page 132
 14 {CLG00000173/132}. We see there that’s table A7, “Use
 15 and definitions of materials of limited combustibility”.
 16 Is that the table you’re referring to?
 17 A. Not just the table, there’s a glossary of terms. So you
 18 may come on to it later on, but things like
 19 cavity barriers and firestop, I know there’s been quite
 20 a lot of talk about those, but there’s definitions in
 21 the glossary of terms, if you -- can’t recall the
 22 appendix, it might be H or J, the back of the approved
 23 document anyhow. You can perhaps look at it at some
 24 point.
 25 Q. Are you sure that at the time you understood what

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1 limited combustibility meant and that’s not something
 2 you have come to understand later?
 3 A. It’s always difficult. I’ve had a pretty good
 4 understanding of the regulations in all of my time, and
 5 if I was dealing with a particular project that asked
 6 for it, then I would -- if I didn’t know, I would look
 7 it up.
 8 Q. So it was your normal practice to regularly refer back
 9 to Building Regulations and ADB?
 10 A. Absolutely, yeah.
 11 Q. On every project?
 12 A. Well, the nature of dealing with Building Control,
 13 you’re not dealing necessarily with the same projects
 14 all the time, you know, they vary and there’s different
 15 aspects you need to look at. So you need to know what
 16 the range is, and you would go through at certain times
 17 cover to cover, but you wouldn’t necessarily read cover
 18 to cover every day, you know. So you refer to it, the
 19 guidance can be complex and you can look in different
 20 parts and it can give conflicting views, but that’s
 21 experience, so ...
 22 Q. In terms of paragraph 12.7, do you agree that it applies
 23 to insulation installed as part of a rainscreen cladding
 24 system?
 25 A. Could you just go back to 12.7 again?

18

1 Q. Yes, that’s fine, that’s page 96 {CLG00000173/96}.
 2 A. It does.
 3 Q. Products with an insulating core, such as window infill
 4 panels?
 5 A. Yes.
 6 Q. Insulating materials packed behind window surrounds?
 7 A. Yes.
 8 Q. Insulating materials packed into any cavities created by
 9 an overcladding scheme?
 10 A. Depends what the cavities are. So if you was talking
 11 about, say, the cavity, the void between the ACM,
 12 I would say no, but if you’re talking about just general
 13 packing of insulation, yes. I’d need to see a drawing
 14 what you was talking about, but sounds like, yes.
 15 Q. In Grenfell, I’m not sure that you’re aware that the
 16 windows were moved out and gaps were created by the new
 17 windows. Would you say that 12.7 applied to the
 18 insulation in those gaps?
 19 A. Yeah, I wasn’t aware at the time of that. Obviously
 20 I am aware since. So my knowledge is such that the
 21 windows were moved out; I didn’t know at the time.
 22 Q. Why weren’t you aware of it at the time?
 23 A. I wasn’t primarily dealing with the project.
 24 Q. We’ve discussed the core of an ACM panel already.
 25 A. Yeah.

19

1 Q. And just to be clear, you wouldn’t have thought that
 2 12.7 applied at the time?
 3 A. No, that was my understanding at the time. I don’t know
 4 where I got my understanding from. I know a couple of
 5 other witnesses that have sat in this chair have said
 6 a similar thing. I haven’t tested it with my peers in
 7 between the period because I thought it would be unfair
 8 to do that and, you know, put them under pressure to say
 9 one or the other. So I’m saying that to you now.
 10 Q. Would you expect your surveyors to have formed similar
 11 views about both 12.6 and 12.7 as you --
 12 A. I would.
 13 Q. -- have expressed?
 14 A. Yeah, I felt it was a commonly held view.
 15 Q. Do you agree that when a building has a storey with
 16 a floor level over 18 metres in height, paragraph 12.7
 17 of ADB applies to the whole of the external wall?
 18 A. I do. Unlike with the ACM, where it allows
 19 a differentiation for the lower part, below 18 metres,
 20 if it’s more than a metre away from any boundary.
 21 I don’t know if Grenfell was more than a metre away from
 22 another building, but let’s assume it was, you could
 23 have a lower class, including, I think it says,
 24 9-millimetre timber cladding.
 25 Q. When you were the surveyor for Grenfell, so 2012/2013,

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1 you didn't feel you had the need to investigate that
 2 particular thing?
 3 A. Yes, at the time you're talking about, this was
 4 pre-application advice. There wasn't a Building
 5 Regulation application in 2012 or 2013. There are
 6 records; they are pre-application records.
 7 Q. And that wouldn't involve, then, general consideration
 8 of the scheme as a whole, is that what you're saying?
 9 A. Pre-application, we're generally responding to what
 10 people are asking us about, so they could come and say,
 11 "We've got a" -- which they did, my first involvement,
 12 if you're going to talk about this.
 13 Q. We will come back to it later --
 14 A. I'll stop then.
 15 Q. -- in more detail, but just to get an understanding of
 16 what you --
 17 A. Yeah, so I believe --
 18 Q. -- knew about the project.
 19 A. Yeah, my first involvement was there was a question
 20 about the smoke ventilation system, and that was what
 21 they wanted to ask, so you wouldn't then -- one, there
 22 wouldn't be any details, you wouldn't just start talking
 23 about the whole of the Building Regulations that applied
 24 to the whole of Grenfell. I was responding to the
 25 particular question that they had.

21

1 Q. I see. We will come back to that in more detail later
 2 on today.
 3 A. Thank you.
 4 Q. I now just want to look briefly at what ADB says about
 5 cavity barriers, so that's 12.8 on page 96
 6 {CLG00000173/96}:
 7 "Cavity barriers should be provided in accordance
 8 with section 9."
 9 If we go to section 9 on page 82 {CLG00000173/82},
 10 and diagram 33 in particular, did you understand at the
 11 time of your work on Grenfell Tower that cavity barriers
 12 were required in the cladding?
 13 A. I would have -- yep, I did.
 14 Q. At the lines of compartment floors and walls?
 15 A. Yes.
 16 Q. Around openings such as windows?
 17 A. Yes.
 18 Q. At the junction at the top of the cladding --
 19 A. Yes.
 20 Q. -- where it met the crown?
 21 Did you understand that there was a difference
 22 between firestopping and cavity barriers, in that only
 23 cavity barriers were required inside the cladding
 24 system?
 25 A. Yes, and it's explained -- the definition is explained

22

1 in the glossary at the back between a firestop and
 2 a cavity barrier.
 3 Q. Again, would you expect your surveyors, so both senior
 4 level and ordinary surveyor level, to have known that?
 5 A. Yes.
 6 Q. Can you recall in your experience of special projects
 7 whether you encountered a project with cavity barriers
 8 around the windows?
 9 A. Erm ... probably, but mainly in new-builds, you may have
 10 around the window openings -- I mean, it changes a bit
 11 with the change with the thermal values, where you need
 12 a different material because of transferring thermal
 13 insulation, but in more traditional construction there
 14 wouldn't necessarily be a cavity there because it would
 15 be sealed with blockwork or brickwork or concrete or
 16 something. So there wouldn't be always in every project
 17 a gap there.
 18 In more recent times, because of thermal
 19 transmittance values, there is a cold bridge,
 20 effectively, at the reveals, so there were sometimes
 21 more complicated details there, but if the requirement
 22 was you needed a cavity barrier there, then that
 23 function -- sorry, that product would have to form the
 24 function of a cavity barrier as well.
 25 Q. Moving on now to industry guidance, were you familiar

23

1 with BR 135 at the time of your involvement in
 2 Grenfell Tower?
 3 A. I was, but from what we've heard recently, the route was
 4 to go down the previous -- following those previous
 5 paragraphs and not down a 135 route, but we can talk
 6 about it.
 7 Q. Is it something that you would be required to refer to
 8 regularly as part of your role?
 9 A. Not so much, but if the applicant was choosing to look
 10 at that route, then you would obviously go down that
 11 route.
 12 Q. Would you have expected someone at surveyor or senior
 13 surveyor level to have been familiar with it too?
 14 A. Not necessarily, because I would say most times on most
 15 occasions people would go just down the route that we've
 16 mentioned, following those paragraphs for the external
 17 weather surface and then the internal insulation.
 18 Q. Now, John Hoban's evidence is that he had never read it.
 19 Does that surprise you?
 20 A. He may not have had a project where it was required.
 21 Q. Did you know at the time that he didn't or he hadn't
 22 read BR 135?
 23 A. I didn't, but I did listen to John Hoban's evidence and
 24 I think he said that he followed the earlier route, so
 25 there wouldn't have been any reason for him to look at

24

1 BR 135.
 2 Q. Did you ever take steps to check that surveyors in the
 3 team were familiar with industry publications like this,
 4 and particularly one that's expressly referred to in
 5 ADB?
 6 A. It's referred to -- there's many references in the
 7 approved documents, many British Standards. You would
 8 refer to them when you need to refer to them. I think
 9 you covered it previously, but Kensington and Chelsea
 10 paid for IHS or technical indices, which is an online --
 11 we paid for an online database, effectively. We had
 12 access to every single piece of legislation. Not every
 13 authority would have that, but we did. So if there was
 14 a piece of legislation that you were unfamiliar with,
 15 you didn't come on to it, you could call it up.
 16 Q. Now, Mr Hoban's evidence was that he was looking at the
 17 linear route under ADB, but he also referred to the
 18 other routes to compliance, and we also heard that the
 19 Celotex insulation product literature referred to
 20 an 8414 test. So, in those circumstances, would you
 21 have expected John Hoban to go away and look at BR 135?
 22 A. Could you -- I'm a bit confused. I thought he was
 23 following, as you called it, the linear route. So if
 24 he's following the linear route, you follow the linear
 25 route. His knowledge of the other routes wouldn't have

25

1 been applicable on this project. But if -- was your
 2 question if Celotex referred to the 8414 test?
 3 Q. Yes, so the product literature for Celotex, which
 4 Mr Hoban says he looked up, referred to an 8414 test.
 5 A. Yes, so he could have then looked up the 8414 test and
 6 he would've had access to that if he needed to.
 7 Q. You say he could have; is that something you would have
 8 expected him to do?
 9 A. It would be usual, and it's usual for Building Control
 10 to interrogate the data and it would be a normal thing
 11 to do. So it wouldn't be a case of accepting any
 12 product on any building unless you had prior knowledge
 13 and experience it is acceptable. So it would be normal
 14 to ask for the product details and then follow that
 15 through to make sure that the product that's been
 16 specified is the one that's mentioned in the
 17 certificate, and that the -- what's been tested in the
 18 certificate is the performance that you're expecting as
 19 laid down in the Building Regulations.
 20 So just to expand on that, sometimes people mention
 21 a particular part of a test, but that's not the part of
 22 the test you're looking for.
 23 Q. Just going back to my question, would you have expected
 24 Mr Hoban to have read BR 135?
 25 A. Not necessarily.

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1 Q. Even where he was following the process you've just
 2 described of checking whether an 8414 test was done?
 3 A. The thread here, and I'm -- if he's following the linear
 4 route, and we're now talking about a -- I mean,
 5 I haven't got the product sheet up that you're talking
 6 about, so we're just talking generally speaking. If
 7 following the linear route, there was a particular
 8 product, so we're looking at the insulation satisfying
 9 materials of limited combustibility, he needs to follow
 10 through that route to make sure that it achieves the --
 11 if we go to the paragraphs about products and materials
 12 of limited combustibility, we need to make sure he
 13 follows that through, that the product certification
 14 satisfies that standard.
 15 I can't say to you at this point whether reading
 16 BR 135 is essential in understanding 8414.
 17 Q. But where Celotex didn't follow 12.7, so it's not --
 18 A. Yeah.
 19 Q. -- a material of limited combustibility --
 20 A. Yeah.
 21 Q. -- the alternative option is an 8414 test.
 22 A. Yes.
 23 Q. So putting the linear route to one side for a second --
 24 A. Yeah.
 25 Q. -- how could Mr Hoban have satisfied himself that it was

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1 compliant ultimately with the Building Regulations if he
 2 hadn't read BR 135?
 3 A. Okay, so are you saying that he's not following the
 4 linear route, he's following an alternative route?
 5 Q. Mr Hoban's evidence was that, in the case of Celotex, he
 6 relied on a statement in the product literature that
 7 said it was suitable for buildings over 18 metres, which
 8 itself referred to an 8414 test.
 9 A. Yeah, but not BR 135 necessarily.
 10 Q. Well, it's applying the criteria in BR 135. That's how
 11 you know whether or not it complies.
 12 A. Yeah. But we're going down the linear route still, is
 13 where we're going.
 14 SIR MARTIN MOORE-BICK: I wonder if we're getting a bit at
 15 cross-purposes.
 16 MS GROGAN: We might be, yes, I think so.
 17 A. Yeah, I don't --
 18 SIR MARTIN MOORE-BICK: Are you going to show Mr Allen the
 19 Celotex datasheet at some point, not necessarily this
 20 instant?
 21 MS GROGAN: I wasn't intending to because Mr Allen was not
 22 himself involved in interrogating --
 23 SIR MARTIN MOORE-BICK: No, but I thought your question was:
 24 if you were Mr Hoban looking at the Celotex datasheet
 25 and seeing a reference to BS 8414 and BR 135, what

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1 should he have done as a result? Is that not the thrust
 2 of the question?
 3 MS GROGAN: That is the thrust, and I was talking more in
 4 terms of general principles, Mr Chairman, of --
 5 SIR MARTIN MOORE-BICK: Yes, but I think Mr Allen would find
 6 it easier to grapple with the question if he saw
 7 the document, that's all.
 8 MS GROGAN: Yes, that's fine.
 9 SIR MARTIN MOORE-BICK: I think that's where we're in
 10 a little bit of difficulty.
 11 MS GROGAN: Yes, I understand.
 12 A. Thank you. If I was checking it myself, I would be
 13 looking that the insulation is a material of limited
 14 combustibility, so I would go to the appendix in the
 15 back of the approved document and the definition, then
 16 I would be looking for a product that satisfied that
 17 material of limited combustibility test. That's what
 18 I would be looking for.
 19 Q. And if it didn't satisfy?
 20 A. Well, it wouldn't be acceptable.
 21 Q. Thank you.
 22 We can come back to the Celotex product datasheet at
 23 another point if we need to, when we're talking about
 24 the materials used in the façade.
 25 A. Yeah.

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1 Q. If we go now to BR 135, it's {BRE00005554/7}, there is
 2 a reference to and a picture of the Garnock Court fire
 3 in Irvine, which is a fire in a multistorey block in
 4 Scotland in 1999. Were you aware of that fire at the
 5 time?
 6 A. I may have been.
 7 Q. Then if we move to page 9 {BRE00005554/9}, we can see
 8 there both explained in the text and pictorially the
 9 mechanisms for rapid fire spread. Do you recall reading
 10 these at around the time of the Grenfell refurbishment?
 11 A. No.
 12 Q. Or in the past before that?
 13 A. Possibly. I generally read extensively, but I haven't
 14 got an exact recollection, and what I knew at the time
 15 and what I know now is all merged. I don't know --
 16 you know, I haven't got a record of it.
 17 Q. Do you agree that, had you read these pages and the
 18 narrative and looked at the diagram here, you would have
 19 understood that cladding systems can create the
 20 opportunity for rapid unseen fire spread, causing an
 21 unacceptable risk to the occupants?
 22 A. No, because I would have known that already.
 23 Q. This guidance warned that external cladding systems
 24 offer a potential route for fire spread through
 25 multistorey buildings, and that close attention should

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1 be paid to the installation of cavity barriers to
 2 inhibit the spread of flame in the event of a fire
 3 involving an external cladding system. Were you aware
 4 of those general principles at the time of your work on
 5 Grenfell Tower?
 6 A. So -- well, yes.
 7 Q. How had you become aware of them?
 8 A. Well, obviously I have been in Building Control for
 9 a long time, so any -- I read building magazines, RICS
 10 magazines. When I'm a Building Control -- when I was
 11 a Building Control manager, I would go to meetings such
 12 as LDSA, which is a group of all the heads of
 13 Building Control in London that would meet monthly, and
 14 anything that happens anywhere, one of them will know
 15 about it, and there's different expertise as well. So
 16 there is a whole -- as well as training courses and --
 17 you know, so there's lots of different avenues where you
 18 can learn about different types of events that happen.
 19 The other thing, of course, is it's the role of
 20 Government as well, and most building legislation, as
 21 you're aware, has been written as a result of disasters
 22 and accidents in the past, hence the District Surveyors'
 23 Association after the Great Fire of London.
 24 Q. Would you have expected your surveyors to have the same
 25 level of knowledge and understanding as you?

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1 A. Well, not the same, but they're going to -- you know, at
 2 different levels, yes.
 3 Q. And did they?
 4 A. Yes.
 5 Q. How do you know they did?
 6 A. Well, I had every confidence in the team and the
 7 surveyors that we have been talking about. They were
 8 all employed before I was the Building Control manager.
 9 They all had CPD, we had various training. I would meet
 10 with them monthly, and indeed weekly. They would talk
 11 to me about any issues they have. I would go out
 12 on site with them, I would check plans with them if they
 13 asked me to.
 14 Q. The guidance available for the majority of the period of
 15 the Grenfell Tower refurbishment project was set out in
 16 the 2013 edition of BR 135 and contained some further
 17 warnings. Let's just turn to this now, which is
 18 {CEL00003364/11}, paragraph 2.1, so that's on the
 19 left-hand side. This guidance drew attention to the
 20 rapid development of the market for cladding systems,
 21 driven by the need to construct more energy efficient
 22 and sustainable buildings, which had resulted in
 23 increased volumes of potentially combustible materials
 24 being used in external cladding applications.
 25 Is that something you were aware of at the time?

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1 A. Probably.
 2 Q. You can't be sure?
 3 A. Well, I read extensively, and what I would say is the
 4 guidance in the Building Regulations would change when
 5 the Government deemed that there's an issue that needs
 6 to be addressed through the Building Regulation process,
 7 and it wouldn't be a case of an individual unilaterally
 8 acting in a way that's different to everybody else.
 9 Q. Do you agree that someone reading this document would
 10 have understood that cladding systems can create the
 11 opportunity for rapid unseen flame spread, causing
 12 an unacceptable risk to the occupants?
 13 A. Yes.
 14 Q. It is correct that this guidance warned that external
 15 cladding systems offer a potential route for fire spread
 16 through multistorey buildings, and that close attention
 17 should be paid to the installation of cavity barriers to
 18 inhibit the spread of flame in the event of fire
 19 involving a cladding system.
 20 A. Yes.
 21 Q. And it is also correct that it warned that a particular
 22 attention should be paid to the selection of insulation
 23 materials.
 24 A. Yes.
 25 Q. Were you personally aware of the need to pay particular

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1 attention to the selection of insulation materials?
 2 A. Yes.
 3 Q. Would you have expected a surveyor or senior surveyor to
 4 be aware of that too?
 5 A. Yes.
 6 Q. Moving on to the BCA guidance, are you familiar with the
 7 Building Control Alliance?
 8 A. I am. I have read some of their documents in the past.
 9 Q. It's correct that it was a pan-industry group
 10 representing the Building Control sector, providing
 11 useful guidance on the interpretation and application of
 12 the Building Regulations.
 13 A. It was guidance for uniformity, predominantly, between
 14 private Building Control and local authorities.
 15 Q. Is it a document that local authority Building Control
 16 surveyors should have been aware of at the time?
 17 A. Not should; could be. It's a guidance document, so
 18 their reference first of all would always be the
 19 Building Regulations, and then you, you know, spread out
 20 from there where you need to, following whatever line of
 21 research you need to.
 22 Q. If we look at {CEP00057294}, this is a guidance note
 23 produced by the BCA entitled Technical Guidance Note 18,
 24 "Use of Combustible Cladding Materials on Residential
 25 Buildings". It's dated June 2014. Are you familiar

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1 with this document?
 2 A. It looks familiar. I believe I've read all of these
 3 documents previously. Obviously I've read them since as
 4 well, and which ones I read and what level of knowledge
 5 I had about them at the time -- what I would say is
 6 there isn't anything in there that's that different to
 7 what's in the Building Regulations, but you may point
 8 some things out.
 9 Q. Were you notified of the existence of this document when
 10 it was published in July 2014?
 11 A. It's not that you're notified. You wouldn't -- there's
 12 not like a line that you would get it, but these
 13 documents -- I mentioned RBKC would have access to,
 14 like, every document that's around. As I say, there's
 15 different areas where I get to hear about things, but
 16 there's not like an official ... if there was something
 17 structurally wrong, there's this SCOS, I think it's
 18 called, alert that you would get informed of
 19 a structural problem through the authority, but there's
 20 not a similar thing with this where you'd get some
 21 automatic alert about it. Your inbox would be full if
 22 that was the case.
 23 Q. Would your answer also apply to when issue 1 of the
 24 guidance note was published in June 2015?
 25 A. Yes.

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1 Q. Did you read this during your work on the Grenfell Tower
 2 project?
 3 A. I didn't.
 4 Q. John Hoban told us that he was not familiar with it.
 5 Can you explain why surveyors in your department, under
 6 your supervision, were not familiar with technical
 7 guidance being issued by the BCA?
 8 A. They would be familiar with the -- what the content
 9 was -- sorry, what the content is. So they're familiar
 10 with the Building Regulations, and this is a guidance
 11 note that -- I can't actually read it at this level at
 12 the moment, but if there's a particular part you want to
 13 point out that you feel is different to the
 14 interpretation, then I can help you with it.
 15 Q. We'll come to that in a second.
 16 Just to answer my question, can you account for why
 17 John Hoban was not familiar with it?
 18 A. Well, he's familiar with the Building Regulations, which
 19 is what he's required to do. It doesn't mean every
 20 single guidance note a surveyor's going to be --
 21 you know, have an intimate knowledge of it.
 22 Q. Moving on to the later edition, if we go to
 23 {CEL00002347}, and we will zoom in on this one, it was
 24 produced in June 2015, and under the heading "Key
 25 issues" on page 1, at the first bullet point --

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1 A. Just need to wait a moment.
 2 Q. Yes. We see similar text there to the 2014 edition,
 3 which I haven't shown you but it is similar, and it
 4 says:
 5 "Thermosetting insulants (e.g. rigid polyurethane,
 6 polyisocyanurate, [polystyrene] foam boards) do not
 7 usually meet the limited combustibility requirements of
 8 AD B2 Table A7 and so should not be accepted as meeting
 9 AD B2 paragraph 12.7. However, if they are included as
 10 part of a cladding system being tested ... the complete
 11 assembly may ultimately prove to be acceptable."
 12 Now, we've heard your evidence you wouldn't have been
 13 specifically made aware when this document was
 14 published.
 15 Can you recall, through your various ways of keeping
 16 up-to-date, whether it was drawn to your attention by
 17 some other route at the time?
 18 A. No, but I would say there's nothing that's different
 19 there than that's in the Building Regulations.
 20 Q. So the mention of polyisocyanurate in that passage I've
 21 just read to you, that was a new addition in 2015 in the
 22 list of materials unlikely to meet 12.7 ADB. Were you
 23 aware that general industry understanding had been
 24 updated to include PIR as not complying with 12.7?
 25 A. What I would say is if you're going down the linear

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1 route, you're checking whatever product comes in, and
 2 products change all the time, that's the nature of the
 3 industry. So at that time when you receive whatever the
 4 product is, and it could be a brand new product, you
 5 would need to check whether it satisfies the
 6 requirements we've looked at earlier about being
 7 a material of limited combustibility.
 8 Q. How would you check other than by looking at industry
 9 guidance and --
 10 A. Well, no, you'd check by asking for the certification
 11 through whatever board that was produced through and how
 12 it was tested.
 13 Q. What steps did you personally take to ensure you kept up
 14 to date with changes in industry guidance such as this?
 15 A. Well, the "such as this", not necessarily. I mean, I've
 16 probably read them all at different times but, as I say,
 17 just -- so I'm a member of the RICS, so there is monthly
 18 magazines, there is obviously the website. We would
 19 have internal training, I would go on training courses.
 20 I was mentioning about a member of the LDSA. We would
 21 have -- staff would sometimes raise issues in relation
 22 to something new they found out about and they would
 23 pass it on, other colleagues would pass information on.
 24 So there was lots of different routes for keeping up to
 25 date with information. And of course the Government as

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1 well. Legislation changes, so the Government let you
 2 know about, as currently is the case, the changes to
 3 legislation that's on, so you read those, the
 4 consultations, and get an awareness of what the sort of
 5 line of travel is. And can comment as well if need be.
 6 Q. Why not read this guidance when you were working on the
 7 Grenfell project? Surely that was a good opportunity to
 8 familiarise yourself with specific guidance on external
 9 cladding systems?
 10 A. The -- at what part of the working on the project are
 11 you referring to?
 12 Q. Well, after this came out, so that would be around the
 13 time of your site visit in 2016.
 14 A. Yeah, so shall we talk about the site visit now, or ...?
 15 Q. I do have specific questions for you about the detail of
 16 the site visit, but in terms of keeping yourself up to
 17 date with guidance, if you knew you were going to site
 18 to look at a cladding project, why not familiarise
 19 yourself with guidance at that point?
 20 A. Because the guidance in the Building Regulations is what
 21 I would follow, and you're -- again, just to say, so on
 22 this particular -- products are changing all the time,
 23 so there could well have been another new product that's
 24 been produced since this document was issued, and that's
 25 okay, people are allowed to have new products, but what

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1 you do is, whatever the new product is, you would ask
 2 for the test data for it and make sure that accords with
 3 the requirements of the Building Regulations.
 4 Q. So just to summarise, then, is it your evidence that
 5 really the Building Regulations and ADB are enough for
 6 the purposes of a surveyor and they don't need, as
 7 a general rule, to go looking at industry documents like
 8 this?
 9 A. Generally, yes, that's the answer, yes, but if the
 10 particular project they're looking at, or the product or
 11 the systems -- because, as you're aware, the
 12 responsibility for compliance with the Building
 13 Regulations lies with the people carrying out the work,
 14 and it says in the approved documents they can either
 15 follow the guidance in the approved documents or choose
 16 any other route they wish, and it's the job of
 17 Building Control then to ascertain what tests and checks
 18 you're going to ask them to follow if they're going to
 19 go down any other route, and that's laid out obviously
 20 within the Building Regulations -- you know, the
 21 approved documents.
 22 Q. Have you heard of the Centre for Windows and Cladding
 23 Technology?
 24 A. I have since. I'm not sure I was at the time. Could
 25 you help me, is it referred to in the Building

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1 Regulations or the approved documents as a reference
 2 document?
 3 Q. It was referred to in the specification for
 4 Grenfell Tower itself.
 5 A. I wouldn't have seen that.
 6 Q. Were you aware that the CWCT produced guidance and
 7 technical notes relevant to the fire performance of
 8 curtain walls and rainscreens?
 9 A. If it wasn't mentioned in the Building Regulations as
 10 a route to compliance, then I probably wouldn't have
 11 followed it, and I'm not sure I was aware of it at the
 12 time.
 13 Q. Moving on to the Building Control performance standards
 14 now.
 15 A. Yeah.
 16 Q. Mr Hoban has mentioned these in his witness statement
 17 and we discussed those with him on Thursday.
 18 The standards were first published in 2006 and
 19 revised in July 2014. Were you alerted to that update
 20 at the time?
 21 A. I would have been aware of it. Again, when you say
 22 alert, there's not -- it doesn't automatically get sent
 23 to me, but I'm aware of changes in legislation and
 24 I would have been aware of it.
 25 Q. Did you read the updated standards when they came out?

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1 A. Probably.
 2 Q. We've heard from Mr Hoban that there was an in-house
 3 seminar at RBKC when the performance standards first
 4 came out in 2006. Do you recall that?
 5 A. It would be on the record. So if it did happen --
 6 I can't recall it at this moment in time, but it would
 7 be on the record.
 8 Q. But there was no similar in-house seminar when they were
 9 revised in July 2014.
 10 A. Yeah, it wouldn't have been a requirement to have
 11 an in-house seminar every time there is an update on
 12 a particular document.
 13 Q. But it's not something at the time that you thought your
 14 surveyors needed some additional training about or
 15 a seminar about?
 16 A. As I said, I can't recall.
 17 Q. In carrying out your role as a Building Control officer
 18 on Grenfell Tower, so 2012/2013 and again in 2016, did
 19 you have in mind these standards?
 20 A. Well, they're a basic part of Building Control function,
 21 so I would have done.
 22 Q. I want to look at these 2014 standards with you now. If
 23 we could go to {CLG10006814/4}. There it explains the
 24 standards and supporting guidance establish --
 25 A. Sorry, I just --

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1 Q. Do we need to zoom in?
 2 A. Yes. What it is, I can't read it at this level of
 3 detail.
 4 SIR MARTIN MOORE-BICK: No, I think we will expand it.
 5 A. If you just wait -- that's it, thank you.
 6 MS GROGAN: So it's that paragraph there:
 7 "The Standards and supporting guidance establish the
 8 level of performance considered as a minimum in carrying
 9 out those tasks so that a Building Control Body's duties
 10 and responsibilities under the legislation are
 11 adequately discharged."
 12 That means they set the minimum standard, would you
 13 agree?
 14 A. Well, you need -- the guidance is two-fold. It's for --
 15 to get a consistency across private Building Control and
 16 local authority Building Control, and you'll be aware
 17 that the guidance is mandatory under the CIC for private
 18 Building Control, and then it's sort of strongly
 19 recommended that local authorities also follow the
 20 guidance. And further, there's some "should" bits
 21 within it, and then there's some guidance. So when you
 22 say should local authorities comply with it, it first of
 23 all depends whether the local authority has decided to
 24 comply with it, and the second thing is, which bits of
 25 the document are you referring to?

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1 Q. So just answering my question, looking at the text
 2 there, it says:
 3 "The Standards and supporting guidance establish the
 4 level of performance considered as a minimum ..."
 5 A. Sorry, "The standards are supported by guidance"?
 6 Q. "The Standards and supporting guidance", sorry if it's
 7 my accent.
 8 A. Which bit are you looking at?
 9 Q. It's the last sentence.
 10 A. Oh, sorry, "The Standards and supporting guidance ..."
 11 Q. "... establish the level of performance considered as
 12 a minimum in carrying out those tasks ..."
 13 A. Well, in that particular paragraph it says "considered
 14 as a minimum" but, as I say, if you look elsewhere in
 15 the document, it talks about the control being mandatory
 16 for approved inspectors, but not necessarily, so it's --
 17 the level of control is the first thing, and then this
 18 is a further level down you're talking about, I think.
 19 Q. So a local authority could pick and choose which
 20 standards it complied with?
 21 A. Not pick and choose. Could you go to the -- there's
 22 some earlier text, I think, on this, where it talks
 23 about the CIC and their mandatory -- or maybe it's in
 24 the supporting covering letters to it.
 25 (Pause)

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1 Q. I don't think it's on that page.
 2 A. Yeah, it mentions about CIC somewhere, but ...
 3 Q. We will find it later. We can come back to that.
 4 A. Maybe we can come back to it, yeah, that's fine.
 5 But in general terms, just apart from establishing
 6 that, which we'll come back to later, in general terms,
 7 most of what's in there is kind of fairly basic stuff,
 8 really.
 9 Q. And at RBKC, under your headship, were you trying to
 10 comply with these guidance standards?
 11 A. We would try to. We may come on to, there's -- it's
 12 been a while since I looked at it, but there is a clause
 13 about site inspection, and I don't know if you're going
 14 to come in to that, so it would be difficult for me to
 15 quote without it, but the frequency of site inspections,
 16 I don't know if that's an element you were going to look
 17 at?
 18 Q. We'll come to that later. Why don't we look at the
 19 standard that I'd like to take you to now --
 20 A. Okay.
 21 Q. -- which is on page 9 {CLG10006814/9}, and that standard
 22 is about resources, and in the "Standard" box, the green
 23 box, it says there:
 24 "Building Control Bodies shall deploy sufficient
 25 experienced and qualified staff, with competencies

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1 appropriate to the type of building control work
 2 undertaken and shall ensure that suitable arrangements
 3 exist for [CPD] and in-service training of its technical
 4 staff.
 5 "Building Control Bodies shall allocate sufficient
 6 resources to discharge its duties, having regard to its
 7 current and future workload, complexity and location of
 8 work, and changes in Building Regulations, Approved
 9 Documents and other recognised guidance."
 10 In your tenure as RBKC head of Building Control, did
 11 you experience any difficulties in meeting this
 12 standard?
 13 A. Mainly no. There would be -- with a small team, there
 14 are times when, with a small team, you can't guarantee
 15 the influx of work. So unlike approved inspectors,
 16 local authorities are required to take whatever
 17 application comes in. It's not a case that you can
 18 refuse it. People are fully entitled to put
 19 an application in.
 20 So there would be times as an office -- didn't
 21 happen very often -- or indeed for individual surveyors
 22 where there may be a sudden influx of work in
 23 a particular area, which is normal kind of management,
 24 but that would be fairly rare.
 25 So generally the answer would be yes, but there

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1 would be other times you would have to then manage that
 2 resource or plug the gaps or help out or do what you
 3 need to do to resolve those issues.
 4 Q. We will look at some specifics later.
 5 A. Yeah.
 6 Q. If we go to standard 5, which is on page 13
 7 {CLG10006814/13} and zoom in there again on the
 8 standard. If you just read that box to yourself.
 9 (Pause)
 10 A. Yeah.
 11 Q. And then if we look at the guidance in the first
 12 paragraph below the standard --
 13 A. So you're going from standard to guidance now.
 14 Q. Yes, I am. It says there in the last sentence of that
 15 first paragraph:
 16 "A written opinion should be issued on all proposals
 17 submitted for assessment."
 18 Would that be a formal opinion or would advice by
 19 email suffice?
 20 A. So this is guidance, this isn't standard, but -- and
 21 just to remind me, is this -- are we talking about all
 22 full plan applications or does this cover building
 23 notices as well, do you know?
 24 Q. Well, let's --
 25 A. Because sometimes instructions are done on site,

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1 you know, where we just talk about product -- something
 2 on site, rather than then everything in writing. But
 3 let's talk about Grenfell related.
 4 Q. Yes, I was going to say, let's stay focused on Grenfell,
 5 which was a full plans application.
 6 A. Yeah.
 7 Q. Where you have a full plans application, would you have
 8 expected your surveyor to issue a written opinion?
 9 A. Well, the wording is a strange thing because it says
 10 "opinion", so "opinion" is a strange word. I would
 11 expect them to confirm what the requirements of the
 12 Building Regulations are and say where it wasn't in
 13 compliance. But, remember, it could be that the work's
 14 okay and then an approval is issued, so that therefore
 15 becomes the written opinion.
 16 Q. So you're saying that the formal approval would be
 17 sufficient, you wouldn't expect anything else?
 18 A. Well, if everything was okay, there's no need to then
 19 write to them.
 20 Q. And if everything wasn't okay, you would expect --
 21 A. I would.
 22 Q. -- that to be issued in writing?
 23 A. I would, and there was a requirement to issue
 24 a meaningful response, which is as full a check as
 25 possible of the information that's been submitted within

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1 a period.
 2 Q. So a meaningful response wouldn't just be a surveyor
 3 saying, "I require more information"; it's a full --
 4 A. It could be. No, it could be. So the meaningful --
 5 there's time limits, as you're aware, for dealing with
 6 full plan applications. You're probably aware,
 7 you know, the five weeks and two months.
 8 Q. Yes, we're aware of those.
 9 A. Yeah. In advance of that, when the information comes in
 10 and hopefully be helpful, you would write an amendment
 11 letter saying -- so if an applicant put in details, to
 12 give them a chance then to amend that before you had to
 13 reject it, and hopefully approve it or conditionally
 14 approve it, that would be the objective. So it's
 15 as full a response as possible.
 16 So if nothing was submitted, the written response
 17 would be, "I haven't got any plans or calculations",
 18 say, "Can you please give them to me".
 19 Q. Do you know if that was done on Grenfell?
 20 A. Well, I didn't know at the time. Obviously there's a --
 21 it's in the public record now. I don't believe anyone's
 22 found a written response like a first amendment letter.
 23 Q. But not something you were aware of either way at the
 24 time?
 25 A. No.

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1 Q. If we go down to the fourth paragraph again in this
 2 guidance, it says there --
 3 A. Sorry, could I go back to that?
 4 Q. Yes.
 5 A. There would have been a requirement to make -- note down
 6 a meaningful response on the database, and it's
 7 a question of timing. So obviously technology changes.
 8 So if there -- even a verbal request saying, "I need
 9 some plans", that would be recorded in a meaningful
 10 response box within the Acolaid database, effectively.
 11 Q. Yes, I think we do have an Acolaid reference for that
 12 which I can dig out for the transcript --
 13 A. Okay, that's good, yeah.
 14 Q. -- at a later stage, but you weren't aware of the
 15 substance of what that response may or may not have
 16 said?
 17 A. No.
 18 Q. So at that fourth paragraph then:
 19 "If plans are passed, or approved subject to
 20 conditions, a schedule written in clear and unambiguous
 21 terms outlining the necessary modifications and/or of
 22 the further plans or information required to demonstrate
 23 compliance should be issued to the client."
 24 So that's the guidance there, that a record of
 25 conditions should be made and kept.

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1 A. Yes. I disagree with the word "client". It could be --
 2 it's usually the applicant it would go to, the person
 3 who is making the application.
 4 Q. Was it standard practice for conditions to be recorded
 5 in writing and sent out?
 6 A. If it was a conditional approval, then yes.
 7 Q. And also kept on the file?
 8 A. So this is if you're going down the conditional approval
 9 route?
 10 Q. Yes.
 11 A. Yeah, of course, yes.
 12 Q. Would it be kept on the hard copy file or is it
 13 something you would expect to see recorded in Acolaid?
 14 A. Okay, so expect it to be in whatever file it's in, and
 15 at different times RBKC moved from a paper file to
 16 electronic, and I can't recall the exact timing of that.
 17 But even if it was electronic, there was still a paper
 18 record as well. So right towards the end of my time at
 19 RBKC there was purely electronic records, and some of
 20 the information would be -- like the application form
 21 wouldn't be kept, for example, it would just be -- the
 22 information would be scanned or recorded.
 23 Q. In November 2014, which is when Mr Hoban --
 24 A. Yeah.
 25 Q. -- says that he issued a conditional response --

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1 A. Yeah.
 2 Q. -- where would you have expected RBKC's record of those
 3 conditions to be kept?
 4 A. I think at that time -- and this would be a matter of
 5 accuracy if we look in the records, you know, you could
 6 ask RBKC about it, and I'm sure you will do -- I believe
 7 there would have been -- so there is an electronic
 8 record, because it's stored on the database, but at that
 9 time I believe the application form and whatever
 10 drawings, even if they were submitted electronically,
 11 would have been printed off manually for the surveyors
 12 and placed in the paper file.
 13 On top of that, one of the means of escape team had
 14 their own means of escape database because -- the reason
 15 for that was the file size was so large that the person
 16 was dealing with, was that the -- and Acolaid had
 17 a limit on the document size that you could upload.
 18 The other thing as well is obviously the Acolaid
 19 database had obviously inspection records in, which is
 20 part of the records. It may have emails you could
 21 upload into the record. And that's what you would
 22 happen, you know, you could upload plans into it. So it
 23 become a comprehensive electronic record as well as
 24 a paper record.
 25 Q. Now, neither the Inquiry nor RBKC has been able to

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1 locate a record of the conditions that were issued for
 2 Grenfell Tower. Can you explain why that might be?
 3 A. The first point is you're talking about conditions, so
 4 there wasn't a conditional approval as far as I know,
 5 but there should have been an amendment schedule, like
 6 an amendment letter, first amendment letter or schedule,
 7 that kind of thing, setting out what the requirements
 8 are, if there were any omissions.
 9 Q. We can come to the document, we can dig it out, but
 10 Mr Hoban emailed the applicant, Studio E, to say that he
 11 was going to issue a conditional approval.
 12 A. Okay.
 13 Q. So in those circumstances, we can dig out the document
 14 later, would you have expected --
 15 A. Yes, so --
 16 Q. -- a record of the conditions to be kept at RBKC's end?
 17 A. And that is -- well, not only their end, but be sent out
 18 as well. So a conditional approval is an approval
 19 notice, and then it has a schedule attached with
 20 whatever the conditions are, and typically it would say,
 21 "Please submit the structural calculation" and then also
 22 highlight the part of the regulations that related to.
 23 Q. Can you explain why we have been unable to locate
 24 a record of those conditions?
 25 A. Not why you haven't been able to find them. If it

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1 wasn't produced, then -- well, no, it should have been
 2 produced, there is no question about it. If the
 3 surveyor has asked for it to be produced and has asked
 4 the team to produce it, then it would be produced.
 5 Q. The guidance also states that records of the plan
 6 assessment process should be kept, so that's not just
 7 a record of the formal decision but a record of the
 8 Building Control officer's view of the plans. Was that
 9 standard practice within RBKC at the time?
 10 A. I don't think it was standard practice, and probably
 11 isn't standard practice across the industry now.
 12 Q. So you would not expect a surveyor to note down
 13 somewhere what their views were about an application?
 14 A. No. Sometimes -- it's important with the letters to get
 15 a history through the chronology, which is why when
 16 there was a paper file, you would keep the paper
 17 information under a treasury tag, and it would be a way
 18 where let's say there was an agreement, you would
 19 mention it in the letters such that it becomes evident
 20 what the decision-making process was.
 21 Could you just repeat the question again, because
 22 there was another thought that I had?
 23 Q. So I was asking was there -- I will read it back to you.
 24 A. Yeah.
 25 Q. You would not expect a surveyor to note down somewhere

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1 what their views were about an application?
 2 A. No, not all the way through, but there was a Building
 3 Control tracker, and I know that term has been
 4 mentioned, so there was an evolution happening, mainly
 5 brought about by customers asking for a tracker. So one
 6 thing is a schedule, the tracker obviously signifies
 7 a time component. So there was a voluntary tracker that
 8 could be used, mainly if the client wanted it, that
 9 could be used on projects where -- it was something
 10 I created basically to list all the documents and the
 11 regulations, and there would be opportunity then to --
 12 for example, in part A to do with structure, you would
 13 say, you know, "Please send me your structural
 14 calculations", and that could be then sent to them and
 15 obviously it was dated and stored in Acolaid.
 16 Q. Are you aware of a tracker being in use in Grenfell?
 17 A. It wasn't -- I don't -- I wasn't involved hands-on with
 18 the project at the time. Obviously since that time it
 19 seems with all your evidence -- remember, I'm not core
 20 to everything, I've only got the snippets in the
 21 hearings that have been made available, by I haven't
 22 seen that there was a tracker there.
 23 Q. Can you recall if the tracker was something that was in
 24 place from 2013 and therefore was something that was
 25 available but not used, or just something that wasn't --

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1 A. It was around that time, but it wasn't compulsory. It
 2 was mainly due to customer need. Clearly it would be
 3 great to have that on all projects. I don't believe
 4 that's the case in all Building Control departments at
 5 the moment, but I'm not in a position to comment on
 6 that.
 7 Q. Moving on to a slightly different topic, at the time of
 8 working on the Grenfell project, were you aware of
 9 previous fires involving external cladding façades on
 10 high-rise residential buildings, including
 11 Knowsley Heights in 1991?
 12 A. Again, it's 1991. I obviously wasn't the head of
 13 Building Control then. But I would have been aware,
 14 because I said I've -- you know, I keep on top of what's
 15 happening, and I've mentioned the sources previously, so
 16 I probably would have done but I can't say explicitly.
 17 Q. Garnock Court, we saw a picture of that when looking at
 18 BR 135, were you aware of that when it happened?
 19 A. When was that?
 20 Q. 1999.
 21 A. Again, I wasn't the Building Control manager, but
 22 I would have been aware of it.
 23 Q. A fire in Mermoz Tower in France in 2012?
 24 A. Doesn't ring a bell, but the thing is because I've
 25 obviously heard about these since, so it's -- I can't

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1 say to you categorically what I knew then and what
 2 I know now.
 3 Q. What about the spate of fires in high-rise buildings in
 4 the UAE in 2012/2013?
 5 A. I think I would have seen them on the TV like most
 6 people would have done.
 7 Q. And the fires at The Address Downtown Hotel and
 8 The Torch residential building in Dubai in 2015?
 9 A. Probably.
 10 Q. Can you recall what the state of your knowledge was, or
 11 was it just something you see on the news?
 12 A. No, my state of knowledge would be the same as it is.
 13 You would apply the Building Regulations in England and
 14 Wales as they apply to whatever project you have.
 15 Q. I'm not sure if you quite understood my question.
 16 How much did you know about those fires at the time?
 17 A. Whatever would have been reported in the Building
 18 Magazine, the RICS, and, you know, as a consequence, if
 19 the Government felt -- I know there was some commentary
 20 on some of the fires -- if the Government felt there was
 21 a need to change the -- address the Building
 22 Regulations, then they would have done so and had
 23 a consultation.
 24 Q. Did the UAE fires alert you to the dangers of ACM on
 25 high-rise buildings?

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1 A. I can't recall at the time.
 2 Q. Were you aware of the fire at Lakanal House?
 3 A. I was.
 4 Q. From that fire, did you gain any understanding of how
 5 fire can spread up the exterior of a building?
 6 A. I would have done, as obviously I've read the findings
 7 of the Inquest, I believe I may have had some training
 8 at the time, and also there was a -- I think it's in the
 9 record, I've certainly seen it somewhere, with the fire
 10 authority writing to chief executives pointing out,
 11 I believe there's a letter.
 12 Q. If we go to {RBK00002607}, this is an email from you to
 13 Paul Hanson of 18 March 2014, if we just zoom in there
 14 so you can see that top half, it says, "Please find
 15 notes below".
 16 A. Yeah.
 17 Q. Those notes -- and we will look at them -- are from
 18 a Lakanal House presentation on or around
 19 20 February 2014.
 20 A. Yeah.
 21 Q. Sent to you by Mr John Humphries at Brent.
 22 A. So the group of people there, that would have been the
 23 people that would have attended that particular seminar,
 24 but they're all members -- other members of -- heads of
 25 Building Control in London, obviously apart from

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1 Marie Buckley that worked at LABC.
 2 Q. Did you attend that presentation yourself?
 3 A. I believe so.
 4 Q. How did you come to receive those notes? Did you ask
 5 for them from Mr Humphries or did he just send them?
 6 A. I can't recall, you would have look at the whole trail
 7 of it, I can't recall.
 8 Q. Did you read the notes at the time? If we scroll up, we
 9 can see them there, if that jogs your memory.
 10 A. I'm sure I would have done, yeah.
 11 Q. Why were you sending them to Paul Hanson?
 12 A. I can't recall now.
 13 Q. At the bottom of the page, we will see there are
 14 obviously different sessions delivered by different
 15 people. So the bottom of that -- actually, it is on the
 16 screen there, we've got, "Deputy Commissioner LFB".
 17 A. Yeah.
 18 Q. It's that top chunk of text.
 19 If you look down about six lines in all caps it
 20 says:
 21 "THERE COULD BE ANOTHER LAKANAL HOUSE ELSEWHERE."
 22 Do you remember that message being delivered at the
 23 conference or jumping out at you when you read those
 24 notes?
 25 A. I don't. I can't actually remember the training event

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1 at all. When -- so this -- did it have a date when this
 2 was sent?
 3 Q. It's sent to you on 18 March 2014, but the presentation
 4 appears to have been on or around 20 February 2014.
 5 A. I can't remember it.
 6 Q. If we go on to page 2 {RBK00002607/2} of the email, and
 7 again zooming in at the top, it's the second chunk of
 8 text mentions:
 9 "Composite panels tested as class 3 instead of
 10 Class 0. No fire resistance.
 11 "Panels burnt through externally but also ignited
 12 within flat above before failure of glazing."
 13 Is that something you remember knowing about at the
 14 time with regard to Lakanal House?
 15 A. I believe so.
 16 Q. If we go just down to the bottom of page 2, under the
 17 "Questions/debate" section, fourth line down, "Spread of
 18 flame - external façades".
 19 Can you recall what that debate was about?
 20 A. Sorry, which bit are you looking at, sorry? Fourth line
 21 down?
 22 Q. Fourth line down, so under "Questions/debate", "Spread
 23 of flame - external façades".
 24 A. 17.36 or -- what's the fourth line down? Which
 25 paragraph, sorry?

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1 Q. Sorry, it's a bit further down, under the heading
2 "Questions/debate".
3 A. Okay.
4 SIR MARTIN MOORE-BICK: Bottom paragraph.
5 A. Sorry, yeah.
6 MS GROGAN: It says there, fourth line, "Spread of flame -
7 external façades".
8 A. Yeah.
9 Q. Do you recall what that discussion may have been about?
10 A. I don't. I'm sorry, I can't actually recall the
11 meeting. I'm trying to get any kind of recollection,
12 but I can't actually remember it.
13 Q. At the time of Lakanal House, was the discussion of
14 spread of flame on external façades something that was
15 happening in the industry that you were aware of?
16 A. At the time, I was, and I'm not sure if I read then or
17 read since, but obviously the Government were aware of
18 it and the sort of DCLG or whatever it was called at the
19 time were aware of it, and the need -- if there was any
20 need for further regulation.
21 Q. Did it prompt in you any feeling that you needed to
22 exercise particular scrutiny over the cladding proposals
23 at Grenfell Tower?
24 A. If Building Regulations are followed, and the buildings
25 are built to the guidance in the Building Regulations,

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1 then there's no change, is the issue. If this involves
2 a -- I know obviously I was aware and I am aware now of
3 the various issues that were presented by Lakanal. If
4 it was built to the Building Regulations, they wouldn't
5 have happened.
6 Q. Is that information that you would have circulated
7 through your team, so Lakanal House and the conclusions
8 that you learned about?
9 A. I generally do. There's evidence of various documents.
10 I mean, I generally do -- I'm one to share information,
11 so that would be the normal course of events.
12 Q. Can you recall forwarding these notes around your team
13 at the time?
14 A. I don't. It's strange that particular one was only sent
15 to one colleague, so the evidence there -- I would have
16 normally done so and I would do, and I sort of stand by
17 that, that I would, you know.
18 Q. If we go to {RBK00010779}, on 3 June 2013 you circulated
19 a flyer for a seminar which was to take place on
20 4 July 2013.
21 A. Yeah.
22 Q. You see there it's "Fire Risk in High Rise
23 Accommodation, Urgent Updates for Local Authorities &
24 Housing Associations".
25 A. Yeah.

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1 Q. This arose out of the fires at Lakanal House and
2 Shirley Towers.
3 Did you attend this event?
4 A. I'd have to check my CPD log. I'm sure I -- I believe
5 I did, I can't recall.
6 Q. This doesn't trigger a --
7 A. I have been to a lot of training, that's the thing
8 I would say, so I can't recall.
9 Q. This doesn't trigger a specific recollection, then?
10 A. It's not far from where I worked. I'd probably say
11 I did go. I've not got flashbacks about it. But I can
12 check my CPD record.
13 Q. Were events like these and the event we looked at before
14 something that only managers would attend or would you
15 expect surveyors to go to these as well?
16 A. No, there was a great deal of training at RBKC, and if
17 it could be opened up to as many as possible, that's
18 what we would do. However, there's also -- I'm not sure
19 if this one was a charged-for one, but there's also cost
20 implications, so -- and also managing the office. So
21 you couldn't send the whole team in a small team. You
22 couldn't say, "Right, everybody, let's go out for
23 a day's training", even if it was fairly close. But we
24 would get -- if someone did go, we would expect them
25 then to feed back any learning to the other team

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1 members, and that certainly did happen at various times
2 at RBKC, and I think that's a normal thing to do.
3 MS GROGAN: Mr Chairman, I'm about to move on to a new
4 topic. I can try and get that done by about 11.30, or
5 we could break now.
6 SIR MARTIN MOORE-BICK: That sounds a bit doubtful, so
7 perhaps we'd be wiser to take a break at this point.
8 MS GROGAN: Yes.
9 SIR MARTIN MOORE-BICK: Mr Allen, we have a break during the
10 morning as you probably know.
11 THE WITNESS: Thank you.
12 SIR MARTIN MOORE-BICK: I think in view of what counsel has
13 said, we will take it now so we don't go on too long.
14 THE WITNESS: Okay.
15 SIR MARTIN MOORE-BICK: We will stop now and come back at
16 11.35, please, and I have to ask you, while you're out
17 of the room, not to talk to anyone about your evidence
18 or anything to do with it.
19 THE WITNESS: Understood.
20 SIR MARTIN MOORE-BICK: Thank you very much, would you like
21 to go with the usher, please.
22 THE WITNESS: Okay, will do.
23 (Pause)
24 SIR MARTIN MOORE-BICK: 11.35, then, please. Thank you.
25 (11.20 am)

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1 (A short break)

2 (11.35 am)

3 SIR MARTIN MOORE-BICK: Right, Mr Allen, ready to carry on?

4 THE WITNESS: Yes, thank you.

5 SIR MARTIN MOORE-BICK: Good, thank you very much.

6 Yes, Ms Grogan.

7 MS GROGAN: Thank you.

8 Just one document just to note for the transcript
9 before I continue with my questions. We discussed the
10 meaningful response earlier, and the note on Acolaid is
11 {RBK00044876/69}. We don't need to go to it, but that's
12 the record which shows a meaningful response.

13 Just before the break, we were talking about the
14 seminar on 4 July 2013 on fire risk updates in high-rise
15 accommodation. If I could just take you
16 to {RBK00050869}, that's a certificate showing that you
17 attended that conference.

18 A. Yeah.

19 Q. So you did attend.

20 At this point -- July 2013 -- Grenfell Tower was on
21 your desk as your project. Did attending that seminar
22 not alert you to the need to be particularly careful
23 over your assessment of Grenfell Tower?

24 A. Absolutely.

25 Q. It did? In what respects?

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1 A. In relation to -- at this time I was -- I believe my
2 position was I was appointed as Building Control
3 manager. You may -- I need to check my records. Is
4 that June 2013?

5 Q. This took place in July.

6 A. I know it's July -- I know it's June, I was appointed in
7 June, but I wasn't heading the section up then, so
8 I was -- I headed it up from 1 September, so that's the
9 first point I was the special projects manager.

10 So if there would have been issues about -- so I was
11 dealing pre-application with Grenfell at that stage. So
12 the Building Regulation application was deposited --
13 I can't recall, was it -- have you got a record of --

14 Q. August 2014.

15 A. Yeah, so that was August 2014 and I wasn't dealing with
16 the project at that stage. So if you're asking me at
17 this time if I was sent information about Grenfell,
18 would it have been useful, of course it would have been
19 useful. So at that time I believe we were -- we was
20 asked to look at something to do with the smoke
21 ventilation, I think, or I can't recall.

22 Q. That wasn't quite my question.

23 A. Okay.

24 Q. My question was: having attended this seminar --

25 A. Yes.

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1 Q. -- which arose out of the fire in Lakeland House, did
2 that alert you or cause you to take particular care over
3 the work that you were doing on Grenfell at that time,
4 it also being a high-rise?

5 A. It would have done if information was sent to me. So if
6 I would have received information on Grenfell, I would
7 have checked it for compliance with the
8 Building Regulations and, clearly, if there was --
9 I can't recall the content of this course at the moment
10 or who the speakers were, but if there was something
11 relevant, of course, as a professional, I would use any
12 knowledge that I had to help me.

13 There was a few ifs in that answer because I can't
14 recall having the information sent to me in relation to
15 cladding and things, but you may have some evidence to
16 say otherwise, I don't know.

17 Q. Moving on to the topic of CPD and training.

18 A. Yeah.

19 Q. In the years 2012 to 2016, were you generally up to date
20 with your CPD for RICS?

21 A. Of course.

22 Q. If we go to {ALL00000001}, and we zoom in there at the
23 top to start with, this is your RICS CPD for the years
24 2013 to 2017.

25 A. Yeah.

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1 Q. If we go to page 2 {ALL00000001/2}, please, at the very
2 top, for the year 2014, it says, "Your CPD recording
3 requirements have not been met". Why was that?

4 A. Well, it's not the case, what you're seeing. So
5 I provided this information to the Inquiry, and when,
6 after the event, you -- so for this current year, 2020,
7 my training isn't complete. So as a member of the RICS,
8 you're required to complete 20 hours, I believe it is,
9 each year, and if you don't complete it, you would be
10 expunged, or at least there would be disciplinary action
11 taken against you. So it wouldn't be possible for me
12 not to have done my training.

13 For the current year, 2020, although I've done more
14 than 20 hours, I haven't yet completed the formal hours
15 that you're required to do. I believe you're required
16 to do 10 formal hours. So when I produced this for the
17 Inquiry off obviously my PC at home, the information
18 about "Your CPD requirements have not been met", that's
19 really for the current year, but there's an error in the
20 way the screen appears and it appears in each year.

21 So if you actually looked into the records for each
22 of those, they're far in excess of 20 hours. I have
23 probably recorded at least 40 hours a year, and I could
24 have put down probably 200 hours a year. Because of the
25 amount of training that I do personally and all the

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1 reading I do, I could add a lot more information if
 2 I needed to.
 3 Q. So for 2014 at the top, then, we can see 21 hours total
 4 for 2014. So that's --
 5 A. Exactly.
 6 Q. -- in excess of 20 hours, but it's not the 40 that
 7 you've just stated there.
 8 A. No, well, some of them, I could do 40 or -- so I've
 9 satisfied the requirement, if you're asking me that, and
 10 from memory, you need to have 10 formal hours, and you
 11 can see there's 14 formal hours for the particular year
 12 you're talking about. So I've satisfied the RICS, but
 13 I could have added a lot more hours there if I needed
 14 to.
 15 Q. Did any of the CPD that you undertook between 2012 and
 16 2016 cover B4 and Approved Document B?
 17 A. It may have done.
 18 Q. But you don't have a specific recollection?
 19 A. No, we could look through. Sometimes within the notes
 20 you can add some more detail about it or attach
 21 documents. Prior to there being an electronic record,
 22 I used to keep the things like the document you just saw
 23 earlier, the -- you know, a copy of the record, I would
 24 keep paper records as well, you know, but I think after
 25 a while I just used the RICS electronic form.

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1 Q. Do you recall any CPD dealing specifically with external
 2 fire spread?
 3 A. Well, I think we've just mentioned there was a -- if
 4 you -- that previous course had something to do with
 5 high-rise buildings, didn't it? So, as I said, I -- do
 6 you want me to repeat?
 7 Q. Other than that course that we have looked at, do you
 8 recall --
 9 A. I may have done. I've -- the training, and I can't
 10 recall the time, I haven't got my log here, but the
 11 training for the fire risk assessor was fairly in-depth,
 12 including looking at, you know, explosions at oil
 13 refineries and things, it was very wide-ranging. So you
 14 would have to go back and look at what was in there, but
 15 I would imagine it would have included B4 as well.
 16 Q. Did you ever attend or undertake any CPD relating to
 17 cladding products and systems in that period?
 18 A. There would be training -- I think I was looking at the
 19 recordings of John Hoban's evidence. There is -- and it
 20 may be in my record, so if I had my record put up, there
 21 may be Celotex and Rockwool and things like that. So
 22 there may be like insulants that ... but I would need to
 23 look in the record, I don't have it.
 24 Q. The reference -- I don't think we need to go to it --
 25 for your training record is {RBK00050382}, and that does

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1 show some training from Kingspan in 2005.
 2 A. Yeah.
 3 Q. Can you recall anything more recent than that?
 4 A. If I -- we could go to the RICS website now if you
 5 wanted and we could look at it, but other than that,
 6 I can't recall it at this moment in time.
 7 Q. I'm interested in your specific recollections, Mr Allen.
 8 A. Okay.
 9 Q. So if you don't remember, you don't remember.
 10 A. No, I don't recall then.
 11 Q. If we go to {RBK00010781}, this is an email, you will
 12 see at the top, that you appear to have sent to yourself
 13 on 19 January 2015, relating to an LABC technical
 14 briefing.
 15 Did you actually attend that technical briefing?
 16 A. I would have to look at my record. I can't recall.
 17 Q. So that doesn't trigger any recollection of having ...
 18 A. No. Obviously I wouldn't have seen this for a long
 19 time.
 20 Q. You will see there there is a time slot, 12.30 to 13.00.
 21 A. Yeah.
 22 Q. It says:
 23 "Combustible insulation in façades, conflicts
 24 between complying with Parts L and B ..."
 25 By somebody from Arup. Does that trigger any

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1 recollection in you having attended a --
 2 A. I can't --
 3 Q. -- seminar?
 4 A. I can't recall it. Again, I'm sure there is
 5 information, I know it's a long time ago, but maybe the
 6 papers are available somewhere if you wanted to see what
 7 the particular lecture was on.
 8 Q. In your role as Building Control manager, were you
 9 responsible for training other building surveyors within
 10 the department?
 11 A. I would say yes because I felt that responsibility, so
 12 RBKC had a requirement, I'm not sure it was all the way
 13 through, to provide at least two days' training per
 14 year. That was a general RBKC requirement, not just
 15 a Building Control or planning one, but training was ...
 16 there was a -- RBKC provided amazing training, actually,
 17 both at personal development as well as technical, so
 18 there was a vast array of training provided.
 19 Q. In terms of the technical training, were you responsible
 20 for the technical training of your surveyors on matters
 21 to do with the Building Regulations?
 22 A. I would happily say yes, because although it wouldn't
 23 necessarily be -- you would have to look in my job
 24 description whether it actually says that in my job
 25 description I'm responsible for training, but I would

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1 take it on myself if there was a change in the
 2 regulations or change in the -- yeah, either the
 3 Building Regulations or approved documents, because
 4 I had to learn it and wanted to find out, then I would
 5 do my own study, including, at times, talking to the
 6 Building Regulations division at the DCLG or whatever,
 7 MHCLG or CLG, whatever it happened to be called at the
 8 time, to clarify my understanding, so then I would then
 9 look to then pass that information on to both my team
 10 and also to the -- our external clients as well.
 11 Q. But focused, as you say, on changes and updates to the
 12 regulations and the approved documents, rather than
 13 wider issues arising in the industry?
 14 A. Predominantly, unless there was -- because the wider
 15 issues, if it was something that come across my desk,
 16 I would then forward that information on to them. And
 17 also new staff as well, by the way. So if we had new
 18 staff -- so I was very keen at -- I say "we"; Kensington
 19 and Chelsea Building Control were very keen on taking on
 20 trainees, both for the good of the department and for
 21 the wider Building Control industry, particularly when
 22 the department was slightly larger than it was towards
 23 the end, and with those trainees, obviously, we'd give
 24 them extensive training, which I was usually involved
 25 with.

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1 Q. We heard from Mr Hoban that there were lunchtime
 2 seminars --
 3 A. Yeah.
 4 Q. -- put on by managers.
 5 A. Yeah.
 6 Q. Was that you?
 7 A. That was something I organised for most of the time,
 8 apart from -- once I become the Building Control
 9 manager, obviously my time was being taken with other
 10 things and I asked for someone to step forward and
 11 arrange them, basically.
 12 Q. In the period 2013 to 2016, how regularly were the
 13 lunchtime seminars held?
 14 A. There wasn't a requirement to actually hold them at
 15 a particular time. I would -- if you was asking me now,
 16 and I could check, and I can do afterwards, I would say
 17 between four and six a year, that kind of amount.
 18 Q. Every year?
 19 A. Between that. I mean, I'm saying I would need to check,
 20 I can produce the records. I think you have got some of
 21 the records because you have got a lot of the -- I saw
 22 it yesterday, you had details of room bookings from the
 23 RBKC log of training, so I think you might have that
 24 already.
 25 Q. If we could go to {RBK00051200}, this is an email from

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1 you to Paul Hanson dated 23 January 2017. You will see
 2 in the first email Mr Hanson asked:
 3 "Hi John,
 4 "Did we have any RBKC in house building control
 5 seminars last year? If so do you have a list ..."
 6 You respond there and say:
 7 "We did not have any lunchtime seminars."
 8 So that would be in 2016. Do you recall that?
 9 A. I mean, you're -- for that particular year, I can't
 10 recall. As I say, I took over -- you would need to look
 11 in all the years. So in this particular one, I can't
 12 recall it. If that's the case, that's the case for that
 13 year.
 14 Q. Was there any particular reason why seminars would not
 15 have been held in 2016?
 16 A. There -- I don't know. I would be just guessing to say
 17 why not. There wasn't a -- you know, lunchtime seminars
 18 are one aspect of training. You would need to look at
 19 the training logs of all the surveyors.
 20 Q. Was it perhaps a particularly busy year, 2016?
 21 A. No, I wouldn't say so. I mean, I mentioned earlier on,
 22 I can't recall when -- I mentioned about -- I said
 23 before you mentioned that about asking one of the
 24 surveyors if they would take over the responsibility to
 25 arrange the seminars.

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1 Q. Can you recall which surveyor that was?
 2 A. I can, but I can't recall if it was this time.
 3 Q. Did your training in the years before 2016 cover part B
 4 of the Building Regulations?
 5 A. There would be, yeah.
 6 Q. And would that be just updates or would it be the
 7 substance in its entirety?
 8 A. Sometimes the substance. So prior to 2016 ... yeah,
 9 our -- so our fire team in particular, or means of
 10 escape and the like, we would often produce -- or
 11 Kensington and Chelsea would often produce guidance
 12 documents of their own accord. We had a colleague that
 13 was particularly knowledgeable on means of escape and
 14 other things and would help for other -- do work for
 15 other associations, so when there was a note out he may
 16 do a talk about it or send it round, which was all
 17 training.
 18 Q. Was that Paul Hanson?
 19 A. It was, yeah.
 20 Q. Do you recall any notes or training about B4 in
 21 particular?
 22 A. Not about B4.
 23 Q. ADB?
 24 A. Sorry, there would be about Approved Document B, yeah.
 25 Q. Did you ever provide specific training on part B4 and

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1 the guidance supporting it in Approved Document B?

2 A. I can't recall any. I would need to study the log, but

3 I can't recall any.

4 Q. Did you ever provide specific training on how to

5 interpret technical documents, such as BBA certificates?

6 A. I probably didn't, but it is regarded as a core

7 function, and as I mentioned, most of the team had been

8 in Building Control for a long time and it's something

9 that would be very familiar to the team.

10 Q. So you would expect a surveyor to be able to read a BBA

11 document and note any limitations or exclusions?

12 A. Yes.

13 Q. What about training on how to interrogate manufacturers'

14 product information, particularly when it comes to

15 claims about fire performance?

16 A. Yes, same.

17 Q. So you did provide specific training on that?

18 A. No, I would expect -- sorry, I would expect them to know

19 how to interrogate it. I didn't provide them training

20 on how to do it. Sorry, I thought you said would you

21 expect them to ...

22 Q. Sorry, perhaps I wasn't clear.

23 A. It kind of followed on.

24 Q. So you would expect them to be able to do it.

25 A. Yes.

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1 Q. Absent any training within your department, how could

2 you be sure that they did in fact know how to do it?

3 A. How would I be sure? Well, I would have, as I say,

4 regular meetings with the team as far as their general

5 competence. They may ask me from time to time about

6 a particular thing where I can assess their level of

7 competence generally, but there wasn't a kind of

8 tick-box to say, "Do you know how to interrogate

9 a particular document?" They're all experienced

10 surveyors that have been there a long time, and it's

11 kind of just a core part of the role, I would say.

12 Q. Did RBKC have a policy of requiring their

13 Building Control surveyors to undertake their own CPD?

14 A. Not a policy. I mean, there's -- I did see some

15 previous notes, so as you probably know, RBKC had

16 a quality management system from approximately 1997 to

17 2012, and as a requirement of the quality management

18 system there was a need to have a training log within

19 that, so I then would make sure that the surveyors had

20 a training log. That quality management system stopped

21 in roughly 2012, so it was then for the surveyors to

22 update their own CPD log, and that was very much the

23 ethos of the department, not necessarily mine but the

24 wider planning department, about people taking

25 responsibility and determining their training needs.

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1 Apart from some specific corporate things,

2 for example if, for example, Acolaid might change or

3 there was a particular -- you know, something to do with

4 equality and diversity or something like that that was

5 more widespread, you may put that in as a core function

6 for every member of staff at Kensington and Chelsea, but

7 it was generally self-directed, the CPD.

8 Q. Aside from the updates that you have mentioned at the

9 lunchtime seminars, what systems did you have in place

10 to ensure that Building Control surveyors were up to

11 date on changes to the Building Regulations and

12 associated guidance?

13 A. Well, it's many. There would also be monthly team

14 meetings with the whole team. There was sometimes

15 technical meetings. You would have informal chats

16 about -- because you're in a close office together.

17 There would be cascading of documents, so if there was

18 a document come in I mentioned like the Building

19 Magazine or RICS, even though it was sent to my home, if

20 there was an interesting article, you would send it

21 round and say, you know, "Look at page 40" on the

22 circulation slip and those kind of things.

23 So wide and varied, I would say, so far as training

24 opportunities.

25 Q. So during any of these wide and varied training

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1 opportunities, did you ever reinforce with surveyors the

2 need to read BBA certificates in their entirety?

3 A. They -- it's a core function, and it was not something

4 that was felt the need to do so. So as I mentioned at

5 the start, it's a case of first of all checking what the

6 requirements of the Building Regulations are, and the

7 specific part or clause or test that it was required to

8 be, because it's very often that manufacturers may claim

9 something but they weren't testing to the right part of

10 the regulation. So the certificate in itself may look

11 fine, but if they're not testing it to what you actually

12 need in performance, then obviously it's not acceptable.

13 That's a core function.

14 So the question you asked, did I remind people,

15 there wasn't a need to remind them.

16 Q. So a core function that didn't require any training or

17 update or reinforcement from you at any point?

18 A. It's just inherent, I would say, in the Building Control

19 function, apart from, as I say, just talking when

20 trainees would first come in, then you would obviously

21 go back to basics. For example, what is -- in

22 a through-lounge in someone's house, how do you look at

23 a steel beam or something, and then you just build up

24 from there.

25 Q. So if John Hoban did not read the whole of the

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1 BBA certificate on Grenfell --
 2 A. Yes.
 3 Q. -- is it your evidence that that would be him failing to
 4 exercise a core function?
 5 A. He would have need -- reading the whole certificate --
 6 he needs to read through and look for the parts that are
 7 relevant to showing compliance with the
 8 Building Regulations.
 9 Q. But if he just read the first page --
 10 A. Well, of course not, that's a different question. If
 11 page 2 was where the information was he needed --
 12 I don't know if you can produce a BBA certificate, but
 13 there might be some paragraphs within that -- I don't
 14 know if there is an example -- that wouldn't necessarily
 15 be relevant to the Building Regulation process.
 16 For example, on the BBA certificate it mentions
 17 compliance in Scotland. So in England, you would just
 18 look at the bit that's relevant to England and Wales and
 19 you wouldn't need to read the part that's in Scotland
 20 because we don't deal with the regulations in Scotland.
 21 Q. You say you were listening or you have watched some of
 22 Mr Hoban's evidence from the previous days of the
 23 Inquiry. Were you surprised that he said he didn't know
 24 what an 8414 test was?
 25 A. At that moment he could have -- it doesn't surprise me

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1 that -- and you could ask me now a number of
 2 British Standards, I haven't got an encyclopaedic
 3 knowledge of every British Standard that's mentioned in
 4 the back of Approved Document B, but if I could look it
 5 up fairly easily and get the document as well, because
 6 it's on the IHS system -- and if someone didn't know it,
 7 they could ask, and the same I would do. I don't know
 8 everything, but I've got a good team around me, both
 9 within RBKC and elsewhere, that if I didn't know,
 10 I could ask.
 11 Q. An 8414 test is mentioned specifically in Approved
 12 Document B.
 13 A. Yeah.
 14 Q. An 8414 test applying BR 135 criteria is specifically
 15 one of the ways that you can achieve compliance with the
 16 functional requirements.
 17 A. Yeah.
 18 Q. But you're not surprised that Mr Hoban was unfamiliar
 19 with both what an 8414 test was and hadn't read BR 135?
 20 A. Well, we mentioned he had looked at the linear route and
 21 he is not looking at BR 135, but as far as the BS 8414
 22 test, I would say if you asked most Building Control
 23 staff, they wouldn't be aware which either of the parts
 24 are to BS 8414, part 1 and part 2.
 25 Q. So --

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1 A. But you could look it up if you need to.
 2 Q. So your answer to my question is you're not surprised?
 3 A. No, I didn't say that. I could repeat it.
 4 Q. Well, if you could answer my question: were you
 5 surprised to hear that Mr Hoban did not know what
 6 an 8414 test was and hadn't read BR 135?
 7 A. I wasn't surprised that he hadn't read BR 135 because --
 8 the reasons I mentioned before -- he is following the
 9 linear route, and in relation to 8414, if he didn't know
 10 at a particular time, he could have looked it up because
 11 there was resource to do so.
 12 Q. Was there a system or practice within RBKC where if
 13 someone else went to a seminar or conference, they would
 14 share what they had learned with the rest of the team?
 15 A. I mentioned that earlier, it wasn't required but it was
 16 generally a good thing to do, because they've learnt
 17 some experience from that and it's obviously as much as
 18 you can to share that information. So if I,
 19 for example, went to an LDSA meeting, and sometimes
 20 there was technical information at the start of that,
 21 there might be someone invited to present to the whole
 22 of London, which they may have been keen to do, I would
 23 endeavour to, you know, disseminate those minutes or the
 24 information.
 25 Q. If we could go, then, to {RBK00001221}. These are the

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1 minutes from a London District Surveyors' general
 2 meeting, so that's the LDSA, is it?
 3 A. Mm-hm.
 4 Q. 15 October 2015, and we can see on the list there from
 5 Kensington and Chelsea it's José Anon attending. So he
 6 was your deputy, wasn't he, at that time?
 7 A. He was, yeah, so he would attend if I couldn't, or
 8 sometimes we -- I shared it with him just for experience
 9 and exposure as well for him.
 10 Q. If we go to page 4 {RBK00001221/4} there, and if we look
 11 about two-thirds of the way down the first box, and it
 12 starts with "PC has a large office building", can you
 13 see that text there?
 14 A. Yeah, I just need a bit of a delay while they just
 15 enlarge it. That's it, okay.
 16 Sorry, where are we looking?
 17 Q. It's now at the bottom, the last paragraph, it says:
 18 "PC has a large office building ..."
 19 Do you see that?
 20 A. Where's "PC", sorry, I can't see? Oh, there, the last
 21 bit, "PC", yeah.
 22 Q. So if we look at the front -- we don't need to go
 23 there -- that's someone from Southwark, I think.
 24 A. Peter Card, I think, "PC attended a recent LFB seminar",
 25 is that what I'm looking at?

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1 Q. No, it's a bit further:
 2 "PC had a large office building (nine storeys) ..."
 3 A. Yeah.
 4 Q. So it says:
 5 "PC has a large office building (nine storeys) that
 6 has PIR cladding as opposed to rockwool insulation over
 7 18 metres high (BCA Technical Guide 18). At the LABC
 8 conference last year there was a presentation on this
 9 subject and the cladding has to be of limited
 10 combustibility, but Kingspan confirmed that their PIR
 11 insulation does burn."
 12 Did Mr Anon share that information back within the
 13 team?
 14 A. I don't know, but there's nothing in there that's
 15 changed to what we've spoken about, so any product needs
 16 to be materials of limited combustibility, so ...
 17 Q. Were you aware at the time that products such as
 18 Kingspan and Celotex did not meet the requirements of
 19 12.7 of ADB? Was that something you knew with respect
 20 to those brands?
 21 A. I wouldn't know every single product that's been
 22 manufactured, but any product that was going to be used
 23 on a building that I was responsible for, I would
 24 obviously look to make sure it complied with the
 25 performance requirements in the Building Regulations.

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1 Q. Can you just answer my specific question which is: did
 2 you know about Celotex and Kingspan at that time
 3 specifically?
 4 A. I may have done, I can't recall.
 5 Q. Did anyone at RBKC attend that LABC conference in 2014
 6 that you know of?
 7 A. At this moment, I don't know. We can look in my
 8 training record. I may have attended.
 9 Q. If we could go to {RBK00002400} now, that's an email
 10 dated 22 January 2015, and it comes from you.
 11 A. Yeah.
 12 Q. And you are sending it to colleagues with a letter from
 13 the LFB regarding compartmentation and firestopping.
 14 You say there:
 15 "Just for information. (You can also add to your
 16 CPD log)."
 17 A. Sorry, could we have that a little bit larger, if that's
 18 possible, just the name and the text.
 19 Okay, thank you.
 20 Q. It says:
 21 "Just for information. (You can also add to your
 22 CPD log).
 23 "Attached is a letter, sent to the Leader of the
 24 Council from the London Fire Brigade.
 25 "It is not clear who the letter is aimed at and I am

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1 awaiting a call from the Borough Commander. I think
 2 it's audience is anyone in the Council who is
 3 responsible for refurbishment work.
 4 "There are case studies in the appendix, some
 5 involving fatalities, in which fire protection measures
 6 have been compromised.
 7 "These are the type of faults that would be picked
 8 up in RBKC as part of our plan checking and site
 9 inspection regimes."
 10 Were you intending that email to be a reminder to
 11 your team to exercise particular care and scrutiny when
 12 dealing with fire protection measures?
 13 A. As I said at the top, it's just for information.
 14 I wasn't sending it to them as a criticism of anything
 15 they were doing, it was: these are faults that have been
 16 flagged up very helpfully by the London Fire Brigade
 17 that were sent to the leader of the council, and I was
 18 obviously then sharing that information. We spoke about
 19 CPD and sharing training and those kind of things; this
 20 would obviously be an example to add to that previous
 21 question that you mentioned about sharing knowledge and
 22 information. I think it's just as it is: it's
 23 information. I wouldn't have had any particular issues
 24 with any of the staff about it, but it's just -- it's
 25 awareness, and just prompted, really, is what I would

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1 say.
 2 Q. Moving on --
 3 A. I think it's self-explanatory, really. I don't know
 4 what more I can say about it.
 5 Q. Moving on to a new topic, which is the role of
 6 Building Control, I'm going to put a number of
 7 propositions to you and you can just tell me whether or
 8 not you agree with them.
 9 Do you agree that the role of a Building Control
 10 body is only to check for compliance with the
 11 requirements of the Building Act and
 12 Building Regulations?
 13 A. Not entirely, depending where you're going. So, first
 14 of all, the function of Building Control, there's many
 15 different duties that Building Control look after, and
 16 that does vary from place to place, so it's not just the
 17 Building Regulations. So typically at -- not typically;
 18 specifically at RBKC, the percentage of time spent doing
 19 Building Regulation work was round about -- it was
 20 somewhere between sort of 70 and 74%, it varied with
 21 time recording, and the rest of the time then was spent
 22 on other functions that the Building Control at RBKC
 23 required me to do, which is in the council's
 24 constitution. It does vary council to council. So,
 25 for example, looking at dangerous structures,

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1 for example, administering initial notices, looking at
 2 demolitions, those kind of things, so there's a whole
 3 load of stuff.
 4 Q. In the context of a building projects that's
 5 controllable by the Building Regulations --
 6 A. Yeah.
 7 Q. -- it's the role of Building Control to check for
 8 compliance with the requirements of the Building Act and
 9 the Building Regulations.
 10 A. Well, where are you reading that from?
 11 Q. That's the opinion of our expert witness, Ms Menzies.
 12 A. Yeah. Could we see her report?
 13 Q. Do you agree with it?
 14 A. Because the --
 15 SIR MARTIN MOORE-BICK: Counsel is just putting
 16 a proposition to you --
 17 A. Yeah, okay.
 18 SIR MARTIN MOORE-BICK: -- and if you do agree with it, you
 19 can say so, and if you don't, you can explain why you
 20 don't.
 21 A. Well, partly. The guidance in the approved documents --
 22 the approved documents are for everybody, and the
 23 guidance is the responsibility for compliance with the
 24 Building Regulations lies with those people that are
 25 carrying out the work. It also says it in the

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1 Building Control performance standard that you referred
 2 to earlier, and it also says it in the manual to the
 3 Building Regulations and in the recently revised manual
 4 to the Building Regulations. So the responsibility for
 5 it is that.
 6 It does talk about enforcement and the regulations,
 7 as you well know, in the Building Act in section 91, and
 8 also talks in passing in regulation 4 of the
 9 Building Regulations and also in -- partly in
 10 regulation 16, but it specifically says on the -- and
 11 you're required to put this on the completion
 12 certificate, that the works -- I can't remember the
 13 exact words now, but the works are proof but not
 14 conclusive proof that the works comply with the
 15 Building Regulations.
 16 So that's the kind of full answer, so I'm not sure
 17 if that's a yes or a no to your question.
 18 MS GROGAN: I think we will get there a different way as we
 19 go through my other questions.
 20 Do you agree that a Building Control body has no
 21 role in design?
 22 A. Not necessarily, because there was a very ... not
 23 design, because it's for the people to obviously design
 24 the project, but many years ago it was very much about:
 25 that doesn't comply, reject it, it's not good enough,

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1 and just ... but very much now it's more about being
 2 part of -- it is about being part of the team as well,
 3 and it may be looking at options and suggestions. So,
 4 typically, plans might be marked up with suggestions for
 5 them to take forward. You're not designing it, because
 6 you definitely can't design, but you would try and be
 7 slightly more helpful than that. Rather than just say
 8 it doesn't comply, just give perhaps some guidance to
 9 them to help them comply. It's not a rejection culture,
 10 you know, you're trying to help people build, in
 11 accordance with the Building Regulations, I hasten to
 12 add, yeah.
 13 Q. Part of the role of a BCB is to check --
 14 A. Building Control body?
 15 Q. Building Control body, yes -- is to check submitted
 16 proposals for compliance with the Building Regulations,
 17 part of the role?
 18 A. Yeah.
 19 Q. And to inspect works on site to ascertain compliance?
 20 A. Well, yes, but there's not a requirement to inspect
 21 on site, as you -- because that's in the regulations.
 22 So there's a requirement that's changed over time for
 23 people carrying out work to give notice of those
 24 inspections. There is nowhere that says that the
 25 Building Control has to inspect. But they generally do

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1 inspect, I'm just explaining what the regulations say.
 2 Q. And when they do, they're looking for compliance or
 3 non-compliance?
 4 A. Yes, with whatever it is at that moment they have been
 5 asked to go and have a look at.
 6 Q. Do you also agree that it's ultimately for those
 7 designing and carrying out building works to ensure that
 8 the Building Regulations are complied with?
 9 A. Agreed, and that is stated in the approved documents and
 10 the manual to the Building Regulations.
 11 Q. And, as you have already said, you would agree that
 12 Building Control approval is not conclusive evidence
 13 that the Building Regulations have been complied with?
 14 A. Not Building Control approval, the Building Control --
 15 the completion certificate, you know, the final
 16 certificate.
 17 Q. Yes. So that's not conclusive evidence of compliance,
 18 is it?
 19 A. No.
 20 Q. Do you agree that a local authority Building Control
 21 surveyor is required to take such steps as are
 22 reasonable to enable him to be satisfied within the
 23 limits of professional skill and care that the
 24 applicable aspects of the Building Regulations are
 25 complied with?

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1 A. I think -- is that quoting from the ... they are the
2 kind of words that are in regulation 16, I think. I'm
3 not sure where you have got that from, but I would say
4 yes.

5 Q. Do you agree that a Building Control body's ability to
6 do its job properly depends in part on the quality of
7 information submitted to it?

8 A. Of course, yeah.

9 Q. Do you agree that where there are gaps or contradictions
10 in the information submitted, a Building Control body
11 should follow up on this with the applicant?

12 A. Yep.

13 Q. Do you agree that exercising reasonable skill and care
14 would include seeking missing or incomplete information
15 from the applicant?

16 A. Yeah.

17 Q. Both the TMO and a range of others on site, such as
18 Studio E, Rydon, Harley and the clerk of works
19 witnesses, have told the Inquiry that they relied on
20 Building Control to ensure that the refurbishment
21 complied with the Building Regulations.

22 A. Yeah.

23 Q. Did you appreciate that at the time of the Grenfell
24 application?

25 A. I didn't, but they would obviously be mistaken in their

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1 expectations and understanding and also what the
2 legislation is.

3 Q. Is that a misconception that you were generally aware of
4 in the industry at the time?

5 A. I can't answer for others, I'm afraid.

6 Q. Was it your experience that people expected too much of
7 Building Control when it came to compliance issues?

8 A. There may be an understanding for most people. I mean,
9 you'll be aware of case law in relation to negligence
10 for Building Control claims, they're not usually
11 successful. I don't think there are any that are
12 successful. The liability remains with the, you know --
13 the liability remains with those people carrying out the
14 work, but I think there would be a perception that if
15 you had a completion certificate -- from a layperson,
16 I'm talking about a layperson, member of the public, you
17 may be thinking, "Oh, it's brilliant, everything is fine
18 then", but if they had a problem, say, with their
19 extension, it wouldn't be Building Control that would be
20 then -- they would be seeking recourse from, it would be
21 the people carrying out the work, the builder or the
22 architect.

23 Q. What about construction professionals and other
24 professionals such as architects?

25 A. Well, I would say they should know. They're in the

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1 profession and it's a requirement that those undertaking
2 building work should do so with reasonable care, as it
3 says in regulation 7, you know, with materials that are
4 fit for the purpose.

5 Q. Moving on now, I'm going to ask you some questions about
6 RBKC's Building Control department, and specifically
7 I want to ask you about the structure of it.

8 A. Yeah.

9 Q. We know that, prior to 2013, special projects were dealt
10 with separately from the general run of Building Control
11 applications. KALC, which ultimately included
12 Grenfell Tower, was a special project, wasn't it?

13 A. Yeah.

14 Q. Was Grenfell Tower considered itself to be
15 a particularly complicated project?

16 A. No.

17 Q. Would it have been a special project had it not been
18 next door to KALC?

19 A. I was the special projects manager and marketing
20 manager, and obviously I do what I'm asked to do by my
21 line manager, so I was asked in the early days to make
22 contact with someone to talk about the smoke ventilation
23 system. So, generally speaking, if someone asks me to
24 do something, I do it. So what the definition is
25 doesn't really matter; it was one that was going to be

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1 dealt with by me, but it was a -- in the size of schemes
2 that are dealt with at Kensington and Chelsea for
3 complexity and value, it would be a fairly small scheme.

4 Q. From 2013 onwards, we have heard that work was allocated
5 on a patch system.

6 A. Yes.

7 Q. Did the allocation of work within the patch take into
8 account current workload, skill and experience?

9 A. Not initially, but yes. So you would look at --
10 something may be allocated, and at different times --
11 I can't recall in 2013 because there were times -- one
12 I wasn't the head of the service, obviously, at the
13 early part of -- did you say 2013?

14 Q. Yes, and I'm specifically asking about after you became
15 head of the service.

16 A. So September 2013?

17 Q. Yes, from then onwards?

18 A. There would be times when either myself or my colleague,
19 my deputy if I wasn't in, obviously, would generally
20 allocate the work, which would be to the patch, but then
21 you'd also take into account what the complexity of that
22 was. Most larger projects we knew about in advance
23 because RBKC were very happy to offer pre-application
24 advice, so there wouldn't be many large projects you
25 didn't know about a long, long way in advance, you know,

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1 years, often you would be talking for years to people
 2 about very large projects.
 3 Q. Mr Anon in his witness statement to the Inquiry, which
 4 is {RBK00029897/3}, at paragraph 10, he says there:
 5 "Before the fire at Grenfell Tower, the way that
 6 work would be allocated is that a surveyor would be
 7 allocated a geographic area in the borough, a 'patch',
 8 and they would generally be responsible for any work
 9 that came in within that area. There were certain
 10 exceptions to this. Because a lot of the team members
 11 have been in the industry for so long, some of us would
 12 always do work for 'partner' clients, regardless of the
 13 patch system. For instance, I deal with a lot of the
 14 Corporate Services work such as schools, flats and
 15 Council buildings, which are scattered around the
 16 borough. I would tend to pick these jobs up when they
 17 came up, even if they were not in my assigned patch."
 18 Do you agree with that?
 19 A. Broadly, yes. At different points in time. But
 20 broadly, yes.
 21 Q. You will just see there, paragraph 11 at the bottom, he
 22 now explains that:
 23 "Since the fire, the process of work allocation has
 24 changed, such that work is allocated dependent on the
 25 complexity of the job."

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1 A. I mean, the first paragraph takes that into account as
 2 well, because they're talking about -- it's working with
 3 clients, and obviously if there was clearly something
 4 very complex that would arrive in a very junior member
 5 of staff's team, there's no way they could check it.
 6 You may -- depending on it, you may partner with them,
 7 you know, shepherd them, those kind of things. You
 8 wouldn't -- it was never a case where if a £500 million
 9 project turned up in a very junior surveyor, (1) you
 10 wouldn't do that, and (2) they're not going to be able
 11 to give the service required for that particular
 12 project, so that just wouldn't happen.
 13 Q. So your evidence is it was always the case that if
 14 something was particularly complicated or outside of the
 15 skillset of a particular surveyor, you would reallocate
 16 it?
 17 A. Absolutely, and if something -- sometimes the
 18 description is wrong, we mentioned there's not always
 19 plans available, so the description could be wrong that
 20 was on the application form, and if something then
 21 transpired it was above the level of someone's pay
 22 grade, basically, then the expectation is they would
 23 need to come and ask for help, and that's always the
 24 case.
 25 Q. So would you keep the allocation of work constantly

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1 under review?
 2 A. Yeah, and I would talk monthly to my team, individually,
 3 you know, so there would be monthly one-to-ones, at the
 4 start it was two-weekly team meetings, so you're
 5 continually -- and part of that, the first bit of that
 6 meeting is, "How are you, how's things?" for them to
 7 have an opportunity to tell me. I would have items
 8 I want to talk to them about, but I would ask them first
 9 up, "How are you doing? How's work?" all those things.
 10 Q. And if someone was struggling with their resources
 11 within the department between late 2013 and 2016, to
 12 reallocate work?
 13 A. Absolutely.
 14 Q. It's correct that in 2013 the number of surveyors
 15 working in the Building Control department substantially
 16 reduced, isn't it?
 17 A. Well, it did. There was a reorganisation. I mean,
 18 there was one in 2009 as well, but in 2013 -- and this
 19 is very much, as you're aware, there is a requirement to
 20 break even on the Building Regulation account, and you
 21 will be aware of the bigger picture that private
 22 Building Control would take some of the market share.
 23 So clearly there was a downward trend in the amount of
 24 work and therefore income coming to Building Control,
 25 and obviously from September 2013 onwards, it's my job

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1 to manage that account and I can't spend money that
 2 isn't mine. So you would manage the resources to
 3 match -- or, yeah, manage resources to match the work
 4 that's coming into the department.
 5 Q. How many surveyors were in the department prior to the
 6 restructuring in 2013?
 7 A. I'd need to look. When I started at RBKC in 1996,
 8 including the support team, admin, there were 37, to
 9 give you an idea. So I used to manage 15 surveyors
 10 through three team leaders as the assistant district
 11 surveyor, and obviously you will see there at the end --
 12 the reason for those changes in 2013 was because the --
 13 I think the year before the Building Control department
 14 on the Building Regulation account made a £500,000 loss,
 15 which clearly isn't sustainable. There is a Government
 16 requirement, and I -- sorry, when I was Building Control
 17 manager, I had to do a report each year to say, over
 18 a three-year rolling period, that you'll break even. So
 19 clearly if you have lost 500,000, you need to address
 20 the balance. And the work wasn't there either, you
 21 know, because the work was reducing because of market
 22 forces.
 23 Q. Mr Hoban's evidence was that, as part of the
 24 restructuring, five surveyors retired; is that right?
 25 A. Well, I don't know if they retired; they took voluntary

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1 redundancy.
 2 Q. But it's right that five ...
 3 A. I don't know the numbers, I would have to -- there were
 4 huge reports done. I can't recall the number. It
 5 wasn't my ... you know, I was obviously carrying on,
 6 so -- I did read the details at the time. It might be
 7 more than five.
 8 Q. Was it the case that the restructuring happened and then
 9 you took on the department, or were you yourself
 10 involved in this restructuring exercise?
 11 A. Well, I was still -- I was still part of the management
 12 team, I have been part of the management team since
 13 1996, but clearly there's a need to change it. So
 14 I can't recall what my role was specifically in changing
 15 it, but I was part of the management team of three, and
 16 I was an inherent part of that.
 17 Q. Perhaps we can get to it another way. Do you recall
 18 a substantial reduction in the number of people working
 19 in the department after the --
 20 A. Oh, definitely. I mean, I would have to think of the
 21 names, but you said -- is there five? I can't remember
 22 if it was five. I just can't remember the ...
 23 Q. One surveyor also, Mr Winn, passed away at around the
 24 same time; do you recall that?
 25 A. Yeah, a friend of mine, yeah. I can't recall when he

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1 passed away, actually.
 2 Q. Was his position filled?
 3 A. I can't recall. I would need to know the dates.
 4 I mean, I did see his partner afterwards and things, so
 5 I do know Mick very well, but I cannot recall -- I just
 6 can't recall the timeframes at the moment.
 7 Q. The Inquiry has also heard reference to Mr Dave Gammon.
 8 He was part of the fire regulations group, the means of
 9 escape group; is that right?
 10 A. Yes.
 11 Q. Prior to the restructuring, how many people roughly --
 12 you don't have to give a specific number -- worked in
 13 that group?
 14 A. It's two or three. So it would be Paul Hanson, there
 15 may have been -- Celia Burt was being trained up,
 16 I believe it was Celia being trained up to help in that
 17 section, as far as continuity. There is another word
 18 for it rather than "continuity", but ...
 19 Q. After the restructuring, we heard that the Building
 20 Control department comprised of you as head of
 21 department and José Anon as your deputy; is that right?
 22 A. Yes, I was Building Control manager. It wasn't -- it
 23 was head previously, but it was changed because of the
 24 redundancy, you can't call it the same post, so I was
 25 Building Control manager.

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1 Q. Then three senior surveyors: John Hoban,
 2 Parvinder Virdee and Amir Fardouee.
 3 A. That sound right.
 4 Q. Just the three. And then three surveyors: Hilary Wyatt,
 5 Colin Ryan and Celia Burt; is that right?
 6 A. Yeah, that sounds about right, yes.
 7 Q. Okay, so that's --
 8 A. I could check that, I would have to -- I've got some
 9 records about that, so I could check it.
 10 Q. Our understanding is that Mr Anon, the three senior
 11 surveyors and the three surveyors, they were all
 12 carrying out case work; is that right?
 13 A. Yeah.
 14 Q. And then you managing them on top?
 15 A. Well, not at the start, because at the very start
 16 I still had my own caseload, and Kensington and Chelsea
 17 were very good with reports and things for Acolaid, so
 18 you could look up fairly easily, and all the surveyors
 19 could, what the workload was by job numbers or number of
 20 plans they had received or full plans they had received,
 21 regularisation certificates, building notices, in any
 22 period.
 23 Q. We also heard that later, so in 2014, Hilary Wyatt
 24 transferred to the planning department; is that right?
 25 A. I believe so. It's -- the dates and times -- I don't

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1 have a record of it, but it will be -- RBKC will have
 2 record of their -- personnel records of what happened.
 3 Q. Celia Burt then left at the end of March 2015, does that
 4 sound about right?
 5 A. It does, yeah.
 6 Q. Colin Ryan passed away in October 2015.
 7 A. If you say so, I can't remember the date.
 8 Q. Then Waqaas Rashid arrived as a graduate in 2016.
 9 A. Well, he arrived as a Building Control surveyor. We
 10 don't have a graduate post, he was a Building Control
 11 surveyor. I think he was a graduate, but he is
 12 a Building Control surveyor.
 13 Q. Did you hire anyone new to the department between 2014
 14 and 2016 apart from Waqaas Rashid?
 15 A. I don't believe so, you would need to check the record.
 16 Q. So that is over the course of around two and a half
 17 years, you went down from having six surveyors and
 18 senior surveyors combined to three plus Waqaas Rashid.
 19 A. I would need to check. I could double check, but if
 20 that's what you're saying, I'm sure you would have
 21 checked it thoroughly with the personnel records, so I'm
 22 sure you're correct.
 23 Q. So that was three senior surveyors, one principal
 24 surveyor, and one new graduate covering the work for the
 25 whole borough from October 2015.

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1 A. If that's what you're telling me, yeah.
 2 Q. What was the reason for the staff leaving?
 3 A. There would be various reasons. You would have to ask
 4 them. I mean, I could ... obviously Hilary went to
 5 planning, I think she was moving somewhere else. I'm
 6 not sure about Celia. Obviously other staff passed
 7 away, that's a pretty good reason.
 8 Q. Was the Building Control department overstretched from
 9 that period, October 2015 to 2016?
 10 A. I don't believe so.
 11 Q. Now, you have mentioned the national requirement for
 12 local authority Building Control services to be cost
 13 neutral, and I think you have explained that that means
 14 you depended on fee income to fund your department; is
 15 that right?
 16 A. Yeah, so it's over a three-year rolling period, and
 17 the council's financial officer had to kind of sign off
 18 that account each year.
 19 Q. Going into September 2013, you mentioned as well that
 20 the Building Control department had already made a loss.
 21 A. It had, yeah.
 22 Q. So was the requirement to be cost neutral linked to the
 23 restructuring of the department in 2013 or were they
 24 just separate?
 25 A. No, of course. It gave those staff the opportunity to

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1 have voluntary redundancy if they wished. You had to
 2 reduced your cost because the -- one, the income wasn't
 3 there, but the work wasn't there.
 4 Q. Did RBKC experience a reduction in work, then,
 5 commensurate with its reduction in staff --
 6 A. Yes.
 7 Q. -- from 2013 onwards?
 8 A. Yes.
 9 Q. What about from 2015?
 10 A. There has been a reduction over time from obviously 100%
 11 in 1985 to -- and it's difficult, it depends how you're
 12 going to measure it, because you can measure it by
 13 numbers of applications, you actually don't know by
 14 income because you don't know what the approved
 15 inspectors are charging, so there's estimates about
 16 that, but I would say probably down to 30%. But across
 17 the country, it's very different in different
 18 authorities, so it would be probably more than -- and
 19 now it would be a lot more than that, but much more over
 20 50% for local authority Building Control. Which is
 21 a good thing. I mean, it's good to have competition.
 22 Q. Did you feel then that the RBKC Building Control
 23 department between 2013 and 2016 was particularly quiet,
 24 given your previous experience?
 25 A. No, because the people that are there are still going to

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1 be fulfilling their job function. So, as individuals,
 2 you have still got the same kind of amount of work to
 3 do, and obviously for me personally, I'm obviously going
 4 to be very busy because whereas in previous structures
 5 you have got deputies and -- you know, proper deputies
 6 and the like, this one, everybody was reporting to me,
 7 so I had direct reports.
 8 Q. Prior to the restructuring in around sort of mid/late
 9 2013 --
 10 A. Yeah.
 11 Q. -- did anyone working within the Building Control
 12 department have experience of a residential high-rise
 13 overcladding project?
 14 A. There's not too many in Kensington and Chelsea, to be
 15 fair. As I mentioned at the start, there's a number of
 16 high-rise buildings, new-build, and as we have looked
 17 at, and unless you tell me otherwise, there's not too
 18 much difference in the regulation between existing
 19 buildings overcladding and new buildings. The core
 20 skills and the regulation are very much the same, you
 21 know, it's in B4. There's not a separate one for
 22 existing buildings.
 23 Q. So just going back to my question, did anyone have that
 24 specific experience?
 25 A. Of overcladding --

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1 Q. Overcladding a residential high-rise.
 2 A. I would have to check. Probably not, as I said, because
 3 Kensington and Chelsea as a borough, there's not that
 4 many towers in it. I mean, there's more, I guess,
 5 proportionately, but there is not that many -- because
 6 of planning restrictions, there's not too much of
 7 a change, I would say. So the answer is no.
 8 Q. What about ACM on a building over 18 metres?
 9 A. I would have to check. I don't know at this time.
 10 Q. PIR or phenolic insulation on a building over 18 metres?
 11 A. Don't know.
 12 Q. After the restructuring, did any of the surveyors who
 13 were retained have previous experience of any of those
 14 things?
 15 A. You would have to ask them, they may have done. They
 16 was all experienced surveyors that, apart from
 17 Waqaas Rashid, were employed not by me, you know, they
 18 was already in post for a number of years before
 19 I arrived, you know, so well over 20 years at least.
 20 Q. In his statement to the Inquiry -- which, for the
 21 transcript, is {RBK00033910}, we don't need to go to it,
 22 paragraph 7 -- Graham Stallwood has explained that in
 23 January 2014, a dedicated administrative team was
 24 created to support the whole planning and borough
 25 development directorate; is that correct?

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1 A. Yes, it changed -- the responsibility for the admin
2 business support ebbed and flowed between me or between
3 the Building Control manager or head of Building Control
4 and planning at different times, so it went away, it
5 come back, it went away.
6 Q. Was it the case that, after this administrative support
7 department was formed, surveyors were required to do
8 more administrative tasks for themselves than before?
9 A. Probably not. It was -- the basis of it I think was the
10 different functions in planning and Building Control had
11 their own business support, so it was seen as a way to
12 kind of centralise that business support rather than
13 have it decentralised. So it was like centralise it,
14 but you still had administrative support. I mean, the
15 role changes because of computerisation and things,
16 you know, we're always changing, but I wouldn't say
17 there was any more particularly.
18 Q. I'm now going to ask you some questions about Mr Hoban
19 specifically.
20 A. Okay.
21 Q. It's correct that José Anon was your first choice for
22 KALC and Grenfell, wasn't he?
23 A. I don't know. I don't know.
24 Q. We can go to Mr Anon's statement, which is
25 {RBK00029897}, I think it's around paragraph 10 -- I'll

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1 dig out the paragraph reference, but Mr Anon in his
2 statement -- you can take it from me -- says that you
3 approached him first but he turned you down due to
4 workload and also knowing people who lived in the tower.
5 Do you recall that?
6 A. I don't. I needed -- so the conversation here would be
7 around -- I was asked to -- by Graham Stallwood to
8 reallocate the projects I had. I may have actually had
9 about 20-odd projects first of all, I think I've seen
10 that on a report, and he didn't want me doing any
11 caseload, he wanted me to obviously concentrate on
12 managing the Building Control service and obviously
13 getting new products in, getting the income in,
14 basically. So I had to allocate a number of projects to
15 different people. So there was some fairly large
16 projects: there was the Exhibition Road building at
17 the Victoria & Albert Museum, which Parvinder Virdee
18 looked at; there was a huge new school, Marlborough
19 Primary School, down in Chelsea, which Amir Fardouee
20 looked at; José Anon took on a the Science Museum from
21 me, took on all of Cluttons' work, a large property
22 owner, or they worked for a large property owner in
23 Chelsea. So there were some huge projects, and
24 obviously then it may have been that in that
25 negotiation, he may have said that. So, I wouldn't --

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1 I trust José, from what he said, so if that's his
2 recollection, I'm happy to go with that.
3 Q. For the transcript, it's paragraph 37, which is on
4 page 8 {RBK00029897/8}.
5 A. Could I have a look at that?
6 Q. Yes.
7 A. Just to see what ...
8 Q. He says, and we can zoom in for you:
9 "I was aware of the Grenfell Tower refurbishment
10 project when the job came into our department. I was
11 initially asked to undertake the surveying work on the
12 project and the associated work at the Leisure Centre
13 and Academy. However, at the time I was dealing with
14 a number of large housing and refurbishment projects
15 across the borough, as well as large projects at Harrods
16 and the Science museum. I did not think I had the
17 capacity to take on this additional workload and advised
18 my supervisor, John Allen, accordingly."
19 Do you recall that?
20 A. I don't recall it, but I trust what José says.
21 Q. Can you explain why José Anon was your first pick for
22 Grenfell and KALC?
23 A. I don't know. It was a case -- there is a team and I've
24 got to share the work out to the team, and, you know,
25 there is only so many permutations and combinations you

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1 can have, so you have got to ask somebody to start with.
2 Q. Did he have specific experience that might have --
3 A. No, no, not at all, I was just sharing the projects out
4 amongst them, and José ended up -- he has mentioned
5 those, he ended up with a lot more than that. He also
6 looked at the -- he says it, all the council's own
7 projects as well mainly.
8 Q. At the time you handed the project to John Hoban, were
9 you aware that he had never done a high-rise
10 residential --
11 A. Sorry, can I just go back? It says there he was dealing
12 with a large number of housing and refurbishment
13 projects. He also dealt with mainly most of the
14 council's projects, if they come separately. So because
15 this was still a council project, that would have
16 included that, but presumably he's excluded it because
17 he said he knows some people there, so he's just saying,
18 "Look, I'm excluding it because of that". So it was
19 more by exception, he would still deal with all
20 the council projects, for the reasons he says.
21 Q. The first reason he gives is that he did not think he
22 had the capacity to take on the additional workload, so
23 Mr Anon, certainly at that period, was particularly
24 busy; would you agree?
25 A. Sorry, I thought you said he knew someone in the --

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1 Q. He gives two reasons.
 2 A. Okay, where's the other reason? Sorry.
 3 Q. At the end of paragraph 37 --
 4 A. Okay.
 5 Q. -- he says:
 6 "I did not think I had the capacity to take on this
 7 additional workload and advised my supervisor,
 8 John Allen, accordingly."
 9 A. Yeah, where does it say about he felt he knew somebody?
 10 Q. Paragraph 38.
 11 A. Well, there you go. So you would have to ask him which
 12 was the most important, but that seems like a reasonable
 13 thing to say.
 14 Q. But you don't recall him saying, "I'm too busy for this,
 15 give it to someone else"?
 16 A. No, José had an incredible ability to deal with work,
 17 you know, a very, very competent man.
 18 Q. At the time you handed the project to John Hoban, were
 19 you aware that he had never done a residential
 20 overcladding project before?
 21 A. I wasn't at that time, but it wouldn't have made -- as
 22 far as the core skills, it's just looking at what the
 23 Building Regulations are and applying the
 24 Building Regulations, and also needing help if you need
 25 help.

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1 Q. Were you aware that he hadn't done a design and build
 2 project before?
 3 A. That surprises me, I would say. Most projects are
 4 design and build.
 5 Q. But you weren't aware at the time that he had that gap
 6 in his experience?
 7 A. I would say that's unlikely.
 8 Q. Did you not know or want to assure yourself in those
 9 circumstances that Mr Hoban was up to speed on all the
 10 relevant parts of the Building Regulations and ADB?
 11 A. No, not particularly. The regulations are -- the linear
 12 route is a fairly straightforward route.
 13 Q. As a special projects manager, you must have known that
 14 he had never done a special project before when you gave
 15 him KALC and Grenfell.
 16 A. Well, it's a strange question because it depends then
 17 what a special project is, so what's the definition of
 18 that, before -- because there wasn't a special projects
 19 role before that, it was created from a previous
 20 reorganisation.
 21 Q. On what basis did you think he was able to take on
 22 a project of the size and complexity of Grenfell Tower?
 23 A. I had every confidence in the senior Building Control
 24 surveyor, he has been there a number of years and would
 25 know how to comply with the Building Regulations and, if

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1 not, to ask.
 2 Q. Did you think about offering him any extra support or
 3 training?
 4 A. Training was offered widely at Kensington and Chelsea,
 5 so we had large access to training. At this point,
 6 training was largely -- their CPD was largely
 7 self-directed, which was in line with what
 8 Graham Stallwood, eventually the executive director,
 9 that was his view about training as well, was that it
 10 was very much for the people to set their agenda for the
 11 training, unless there was something over and above that
 12 that was required to be done.
 13 Q. So you wouldn't have known if there were any gaps in
 14 Mr Hoban's knowledge because he was doing self-directed
 15 CPD; is that your evidence?
 16 A. Yeah, I would say that there isn't a way of checking
 17 every single project, every single regulation, but it's
 18 going back to the core skills, it's look at the
 19 requirements of the Building Regulations and apply them,
 20 and as we have gone through, the linear route is
 21 a fairly straightforward process.
 22 Q. In the context of what you had recently learned about
 23 the Lakanal House fire, and given that this was
 24 a residential high-rise refurbishment, did you not think
 25 it was appropriate to double check that Mr Hoban was

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1 appropriately skilled and up to date?
 2 A. As you have seen, from Lakanal House, if the building
 3 would have been built at the time in accordance with the
 4 Building Regulations or, depending when it was built,
 5 the London Building Acts, then if they had followed that
 6 linear route, then the Building Regulations would have
 7 been fine. I have since read some of the -- at the
 8 Inquest, I've read some of the findings of -- I forget
 9 the lady's name now, but they were saying that it was
 10 an issue about class 0 on the outside, and then she
 11 mentioned about it not needing to be fire resistant, it
 12 says in the transcript of the -- when the -- one of the
 13 reports that was done from the Inquest. So that
 14 actually wouldn't have helped, because the important
 15 thing is: make sure the outer surface is class 0, that
 16 the insulation inside is materials of limited
 17 combustibility, and you follow the cavity barriers.
 18 Q. You have mentioned that it would have been reasonably
 19 straightforward for Mr Hoban just to follow the linear
 20 route through.
 21 A. Yeah.
 22 Q. Why at this stage, given that you didn't know and had
 23 never asked, would you have assumed that Grenfell Tower
 24 was following the linear route to compliance?
 25 A. I wouldn't have known.

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1 Q. So if you didn't know, why didn't you check that he was
 2 familiar with the other ways of achieving compliance?
 3 A. The responsibility for the -- dealing with the project
 4 lies with the particular surveyor, and then my
 5 supervision of that would be linked to asking for -- at
 6 monthly meetings with him, as far as is he coping
 7 workload wise and those kind of things, but technically
 8 it's assumed that the surveyor, a senior
 9 Building Control surveyor, has got the core skills to
 10 deal with a range of products, and that's what his job
 11 description says. There's not a limit on: you can't
 12 deal with these projects. It's within his job
 13 description.
 14 Q. Were you aware at the time about the increasing use of
 15 BS 8414 tests for combustible insulation on high-rise
 16 buildings?
 17 A. There wasn't so many, so I didn't deal with that many
 18 through the BR 135 route that you were talking about.
 19 Q. So that wasn't an issue you were really live to at the
 20 time, is that what you are saying?
 21 A. Live is your choice of words. I'm live to knowing what
 22 the Building Regulations are and applying them to any
 23 project that I was responsible for.
 24 Q. But isn't that why industry guidance such as BR 135 is
 25 so important, Mr Allen, in that it raises specific

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1 issues that are happening at the time that
 2 Building Control surveyors might need to be aware of?
 3 A. BR 135 largely re-emphasises what's in the
 4 Building Regulations. So if you follow the
 5 Building Regulations, then you wouldn't be going too far
 6 wrong.
 7 Q. BR 135, as we looked, specifically referred to PIR
 8 insulation as being something that wouldn't meet 12.7.
 9 A. Did they say "unlikely to meet"? Was that the words?
 10 Q. Sorry, I misspoke, that's the BCA guidance.
 11 A. Yeah, sorry.
 12 Q. But the question still applies. The BCA guidance
 13 specifically referred to PIR insulation as not meeting
 14 12.7.
 15 A. No, they didn't. I think it said "unlikely to meet".
 16 Q. Was that a fine distinction that you were aware of at
 17 the time?
 18 A. Probably not, but the distinction is any product that's
 19 going to be used, and there's new products all the time,
 20 you would check to make sure the particular product that
 21 they're using first of all has a certificate that's
 22 within date and all the things that they would know
 23 about, it's tested in the UK or if it is a European
 24 Standard, the test is relevant, and also the test
 25 actually is tested for the particular requirement you're

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1 looking for in the Building Regulations and it's not
 2 something different. That often happens with
 3 manufacturers, you know, the test, it's not testing
 4 what's required.
 5 Q. Again, that issue that you have just rehearsed just now,
 6 is that something you were aware of at the time in 2013
 7 or is that something you have learned since Grenfell?
 8 A. No, the core knowledge about looking at any test data is
 9 a core function for a Building Control officer, it just
 10 goes -- taken as read, that's the same.
 11 Q. Looking at Mr Hoban's workload, you have said in your
 12 statement that you would meet each surveyor monthly and
 13 check through their job sheets and confirm their
 14 workload was manageable.
 15 A. Yeah.
 16 Q. Do you have a specific recollection of doing this with
 17 John Hoban during his time on the Grenfell project?
 18 A. Yes.
 19 Q. Did you meet him every month?
 20 A. More or less every month. Sometimes not. I do have
 21 a record in a planner of each individual surveyor and
 22 meetings I have had with them. It's more of
 23 an aide memoire for me, but it was using a planner that
 24 I trialled for RBKC, I trialled a -- I went on a course
 25 trialling a particular planner, which I then got the

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1 planner as part of going on the course. So I do have
 2 a personal record of each surveyor, and some of which is
 3 personal stuff, but I did offer to disclose it, or my
 4 legal team offered to disclose it to the
 5 Metropolitan Police previously.
 6 Q. Mr Hoban said in his evidence that you did not ask him
 7 about whether his workload was manageable at these
 8 meetings. Can you comment on that?
 9 A. That would surprise me, because my typical approach
 10 would be to ask each surveyor how they're doing, how's
 11 their work, but, you know, if he said that, that's what
 12 he said.
 13 Q. Did he ever raise any issues with having a heavy
 14 workload with you at these meetings?
 15 A. He would have done, and I would have to check the notes
 16 I have, but he would have done and I would have then
 17 offered to help in any way I could.
 18 Q. How would you resolve those issues?
 19 A. Well, you can share the work around the team.
 20 Q. Do you recall any example of when you did that in
 21 respect of Mr Hoban?
 22 A. Yes.
 23 Q. What was that?
 24 A. I've got record of offering to help Mr Hoban, and I can
 25 give the date after this, there was a particular --

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1 I said, did he need any help with the full plans
2 applications that he had, there was a few that had come
3 in, and at the time he said no, but then two days later
4 he asked me -- he gave me a full plan which I passed to
5 one of my colleagues, Parvinder Virdee.

6 Q. Can you remember what year that was?

7 A. No, I can give you the exact date, but not now. So it's
8 in -- between -- I haven't got the date here, but it's
9 in my planner and I can supply the date.

10 Q. So at some point between --

11 A. Between 2013 and 2018. 2017, because he left in 2017,
12 didn't he?

13 Q. Mr Hoban has said that there was an increase in his
14 workload from 2013 as a result of the restructuring that
15 we've discussed. Do you recall that happening?

16 A. Yes and no. I did listen to what Mr Hoban said, or
17 John Hoban said, but it depends what you're looking at
18 in relation to numbers. So there was a number that I'd
19 seen in the press and I heard about 130 jobs. Having
20 130 jobs -- first of all, each month I would meet, and
21 one of the things I would do is make sure that the
22 records are up to date, because jobs may not have been
23 closed down, and of those 130 -- because I had that
24 data, it was a sheet that I would produce, you know,
25 it's from Acolaid or one of the other software -- types

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1 of software we had. Of those 130, there would be
2 a number of those that hadn't even started, so that
3 wasn't like an inspection workload, and there was
4 a number that hadn't been inspected for 90 days, and on
5 one of the ones I looked at on a particular time, the
6 highest number I could see may have been 121, and
7 I think there was only something like 30 current jobs,
8 that kind of order.

9 But the other thing, the number of jobs isn't the
10 only indicator. I also had details of how many plans
11 each surveyor had received, how many full plans they
12 received, how many building notices they received in
13 each year, and it would actually be quite low. They may
14 have one or two plans a week, maybe less.

15 Q. So is your answer to my question that you don't recall
16 an increase in Mr Hoban's workload from 2013?

17 A. Not -- there's ebbs and flows, as I mentioned at the
18 start, work across the department and in an individual
19 patch. So clearly, as I said at the start, I can't
20 refuse work; it's a requirement of the local authority
21 to take any applications there are. So in a particular
22 patch there would be ebbs and flows; there would be very
23 quiet times and there would be very high times.

24 So for Mr Hoban, I had the records of how many case
25 numbers he had compared with other surveyors, and he

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1 wasn't the highest. But his numbers weren't necessarily
2 reflective, and some of the other surveyors as well, to
3 be fair. But the same thing: if you need help, ask,
4 which we did.

5 Q. So you told the Inquiry earlier that there was
6 a substantial reduction in the number of staff following
7 the restructuring.

8 A. Yes.

9 Q. Is it your evidence that that wasn't accompanied by
10 an increase in workload for everyone else in the
11 department as a result?

12 A. No, I certainly had more work, I know that much, but
13 some of the surveyors did, but it ebbs and flows, you
14 know, that's the thing, so they had quieter times and
15 then more busy times. But I always required and -- the
16 idea is to do the job while you're here, so 36 hours was
17 required. Nobody stayed in the office 10 hours,
18 12 hours a day; it was a 36-hour job, and it was then my
19 job to make sure that that was the case, because I cared
20 about the welfare of the staff.

21 Q. Before September 2013, how many projects did one
22 building surveyor normally manage at one time?

23 A. Well, that's what I'm saying, the number of projects --
24 it's a very -- over time, that's a very difficult thing
25 to say, because one project could be a single-storey

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1 extension that may cause a lot of work, another one
2 could be a huge project that doesn't cause -- there's
3 different complexity, and it's always a thing between
4 surveyors about, "I've got this many jobs, you have got
5 that many jobs and he's got this amount", so I did also
6 have meetings with all of the senior Building Control
7 surveyors together, because they were saying, "You
8 haven't asked him to do this, you haven't asked him to
9 update his records", or whatever it was. So I had
10 a meeting with them all together, which I've got the
11 date of that as well.

12 Q. When was that meeting?

13 A. I can provide the date, it's in the planner. I'm happy
14 to release that information.

15 Q. We know from Mr Hoban's evidence that he was allocated
16 more work or another patch in March 2015. Do you recall
17 that?

18 A. It would be parts of patches when people leave. So --
19 but then there is an adjustment, but always it would be
20 managing the work on a -- well, weekly and monthly
21 basis. What actually happened towards the end in
22 2016/17, I was actually having weekly planning meetings
23 with each of the surveyors.

24 Q. Is that because their workload had increased as a result
25 of the loss of staff?

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1 A. No, because they were talking to me about it. I've had
 2 it in the past where -- it was a long, long time ago,
 3 I'm not sure -- it may have been -- I wasn't the head of
 4 Building Control then, but one of the team was saying
 5 they had a lot of work, so I said, "Okay, I'll spend the
 6 week with you". So I sat down first of all and said,
 7 "Okay, what plans have you got to check, let's check
 8 your plans", so we done that. Then I said, "Let's catch
 9 up on all your inspections", we done that, and by about
 10 day 3, I said, "At this moment in time, what have you
 11 got to do?" and they said, "Nothing", and I said, "Okay,
 12 let's carry on then". But before then it's like, "I've
 13 got too much work" and, you know, "I've got these
 14 visits", but it's not necessarily the case.
 15 Q. So were you aware at the time that, through 2015 and
 16 into 2016, Mr Hoban was experiencing difficulties with
 17 his own health and in his personal life?
 18 A. Not personal life. John was a private person and
 19 there's always that balance as a manager between prying
 20 too much, but obviously regarding health, I would be
 21 attuned to that, and I would always encourage my staff
 22 to seek medical help, you know, go to the doctor and
 23 such things. In my planner I noted he had an operation
 24 on his nose, and obviously then talking when he come
 25 back about -- and this is not forcing anybody to come

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1 back, once they're signed off, they come back to work,
 2 there was a question about him then not going to sites
 3 that were too dusty, for example, and offering for him
 4 to work from home and those kind of things, so it's
 5 about making reasonable adjustments.
 6 But people also have got to be fit to work.
 7 You know, working at a council, they have their own
 8 procedures around, eventually, if someone isn't fit to
 9 work, they may no longer be suitable for doing the job,
 10 so obviously they are keen to work and you want to make
 11 reasonable adjustments so they can work.
 12 I did know one other thing about his personal things
 13 as well, by the way. We did do a care plan and offer
 14 additional -- leaving early or offering extra leave or
 15 something in relation to his mother. So I have got in
 16 my planner the care plan that we agreed and wrote up,
 17 which is in line with RBKC's procedures.
 18 Q. And that's when he was caring for his mother?
 19 A. For his mother. That's the only sort of personal thing
 20 I really know, and rightly so, he's a private person.
 21 Q. Mr Hoban has said in evidence that he asked for help in
 22 2015, and we can go to it in the transcript,
 23 {Day46/157:15}. If we zoom in there on line 15 a little
 24 bit, he's asked the question:
 25 "Question: Did you not say to John Allen, 'Look,

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1 I'm overstretched, I can't do all these jobs
 2 properly' --
 3 "Answer: I did."
 4 Then at line 20:
 5 "Answer: I did ask for help in I think it was
 6 April 2015, because when he gave me the new area I felt
 7 that I was being -- or that I was struggling with my
 8 workload. I made a number of suggestions about what we
 9 should do with Celia's area and the work in there, and
 10 none of those suggestions were taken up. I felt I was
 11 in a position that I couldn't refuse. I was instructed
 12 to deal with that additional area, and I had to take it
 13 on.
 14 "Question: Are you sure in your own mind that those
 15 managing you knew clearly what the difficulties were
 16 that you were going through?
 17 "Answer: Yes. You know, as I say, I was -- I had
 18 health issues going on, which sometimes I had to go home
 19 early from work or -- because I was unwell. I was going
 20 to various hospital appointments. I was going -- which
 21 obviously I let my manager know. I was -- I mentioned
 22 to him about my high blood pressure on a couple of
 23 occasions. As I say, you know, I told him about this,
 24 but I felt I was in a position -- I felt I was unable to
 25 say no to him.

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1 "Question: Really?
 2 "Answer: Mm.
 3 "Question: Were there no facilities or resources
 4 offered to you or provided to you to support you, to
 5 make sure that you could do your Building Control job on
 6 Grenfell to the best of your ability?
 7 "Answer: As I said, I pointed this out to -- I felt
 8 I couldn't escalate it any further."
 9 Do you recall him asking you for help and making
 10 suggestions?
 11 A. Asking for help -- he mentioned about this particular
 12 plan. As I say, these meetings were recorded as well,
 13 so -- not by video or audio, but there was a written
 14 record of the event, some of which Mr Hoban signed, and
 15 they were recorded on -- the council had a system called
 16 SharePoint, so we -- there would be different areas,
 17 there would be team areas, there would be another area
 18 just for myself and John Hoban that only we could look
 19 at, and then I'd post his annual performance review, his
 20 monthly meetings and other things in SharePoint so he
 21 had a record of those things as well, and they are as
 22 a matter of fact and they're available.
 23 Q. Do you recall him asking you for help?
 24 A. He asked for help -- the one I've got a note in the
 25 planner was when he asked for help taking that full plan

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1 application off him, and I took it off him and gave it
 2 to Parvinder Virdee.
 3 In relation to the other things, and I mentioned
 4 about his health before, I was keen to look after the
 5 staff and support wherever I could, you know, within the
 6 confines of people are still required to work and you
 7 still want to get the best out of that person.
 8 Q. Do you recall him making suggestions for how he could be
 9 helped and not taking those up?
 10 A. I can't recall that. I'm open to listen to any
 11 suggestions from anybody, you know, and I would welcome
 12 that.
 13 Q. You said earlier that this role is a 36-hour job and
 14 it's a case of you do your work in the time, you are not
 15 expected to do overtime.
 16 A. Yeah.
 17 Q. Were you aware he was coming in at the weekends to
 18 finish his work?
 19 A. You would -- the Kensington -- you would need to check
 20 that. He may have come in once and I said to him,
 21 "Look, there is no requirement to do that". Sometimes
 22 another officer may take some stuff home because they
 23 wanted to and I'd say, "Please don't do that, you leave
 24 the building and that's your work".
 25 Now, you could ask RBKC. To get in the building,

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1 you need to swipe in, so you could get a record of how
 2 many times he come in, and also record all their times
 3 in and out.
 4 I did actually -- the converse, here -- I did
 5 actually want to have a -- and ask my managers at the
 6 time if I could have a sign in and out sheet, only
 7 because, you know, they don't seem to be around that
 8 much necessarily.
 9 The other thing I would say is I've worked in other
 10 places, and it would be typical for surveyors to do
 11 around ten inspections a day, do site inspections,
 12 that's the kind of number, you know, for more smaller
 13 domestic. At Kensington and Chelsea the average was
 14 nearer between two and three across the office, so it
 15 was a very different job, and not always looking at
 16 complex jobs. The workload wasn't high at all times,
 17 but there would be some limited periods, as I've
 18 mentioned, in a smaller team where there is ebbs and
 19 flows, but we would manage that as best we can.
 20 Q. So if we just take this in stages: were you aware at the
 21 time that he was coming in at the weekends?
 22 A. I may have known he come in once afterwards, and if you
 23 could check the record, if they've still got them, you
 24 would know how often he come in, but I can only recall
 25 once and I told him not to do it again.

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1 Q. Are you suggesting that Mr Hoban is mistaken when he
 2 says he was coming in at the weekend?
 3 A. I've got no assertions to make about Mr Hoban.
 4 Q. Mr Hoban gave evidence that he was going to bed holding
 5 a notebook and wasn't sleeping because his workload was
 6 so heavy. Did you not notice at the time that he was
 7 struggling?
 8 A. Not at all. I had monthly and weekly meetings with him,
 9 and it's a case of a two-way thing about one asking
 10 him -- you can only open yourself up and offer.
 11 I encouraged him -- he had a cough for a long time,
 12 because he was coughing in the office, and I was getting
 13 some comments from other staff, you know, because we
 14 were working in very close confine, and obviously I was
 15 encouraging him to go to the doctor.
 16 I think -- I mean, if we're talking about personal
 17 things, as you're pushing me, I think he found out he
 18 had a vitamin D deficiency, I can just remember that, so
 19 that was one reason why at some point he had this cough,
 20 I think, but you would need to check.
 21 Q. Mr Hoban said a little later in his evidence that he
 22 felt he could not escalate his concerns any further, and
 23 again we can go to that: it's {Day46/158:12}. I will
 24 just read it and then I'll ask you a question.
 25 A. Okay.

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1 Q. He says:
 2 "Answer: As I say, you know, I told him about this,
 3 but I felt I was in a position -- I felt I was unable to
 4 say no to him.
 5 "Question: Really?
 6 "Answer: Mm.
 7 "Question: Were there no facilities or resources
 8 offered to you or provided to you to support you, to
 9 make sure that you could do your Building Control job on
 10 Grenfell to the best of your ability?
 11 "Answer: As I said, I pointed this out to -- I felt
 12 I couldn't escalate it any further. I just felt that
 13 I had to do that. I did say on a number of occasions in
 14 the office that we needed more staff. I felt that we
 15 were under-resourced. As I say, we were -- we lost six
 16 people in -- well, sorry, September 2013 ..."
 17 And then he goes on to explain who left.
 18 Then if we go down the page to line 20, Mr Millett
 19 asks:
 20 "Question: So was there a means of escalating it to
 21 somebody higher up the management chain?
 22 "Answer: I felt I couldn't do that.
 23 "Question: I just want to understand why you felt
 24 that. Was it a culture in the department --
 25 "Answer: Yes."

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1 Then just to complete the passage, over the page,
 2 Mr Millett is still asking:
 3 "Question: -- or just a natural diffidence on your
 4 part?
 5 "Answer: No, no, I felt, you know, it was a culture
 6 within the department."
 7 Were you aware that Mr Hoban felt uncomfortable
 8 raising concerns?
 9 A. I would say Kensington and Chelsea is a -- well, when
 10 I was there, was an excellent employer, and as you might
 11 expect of a good employer, their personnel policies,
 12 grievance, whistle-blowing, was in a very small
 13 department -- I know, for example, John Hoban went above
 14 me, which is good, to agree some leave with the person
 15 above me, Graham Stallwood. So he was free to go and
 16 talk, as other people were, at any time.
 17 The borough was a good borough to work with. There
 18 is lots of opportunities to talk about it. I would have
 19 monthly meetings with him, weekly meetings with him. It
 20 was never the case. And I'm not a bully and never have
 21 been a bully with any staff. It's about encouraging
 22 them for their own development and also to get the best
 23 out of them, which is a reasonable thing for a manager
 24 to do.
 25 Q. So I think the answer to my question about whether you

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1 were aware is no.
 2 A. Well, no, but then, as I said, before that we spoke
 3 about some health issues that I tried to help him with,
 4 but it's not a requirement that people employ staff
 5 long term that are unwell. There's policies and
 6 procedures about that. So you're encouraging the people
 7 to -- obviously you want them to be healthy, return to
 8 work, as they do, and then have reasonable measures,
 9 part-time work and all those things to help them,
 10 offering working from home.
 11 So I was as supportive as I could possibly be, and
 12 I'm happy with that, you know, as far as my involvement.
 13 Q. Do you recall whether there would be any reason why
 14 Mr Hoban would not feel able to raise his concerns?
 15 A. Well, I'm probably too close to say, but I would say
 16 not.
 17 Q. Were you aware of a culture within the department that
 18 made it difficult?
 19 A. Certainly not, and the wider department, it was probably
 20 one of the greatest groups of people I know. They just
 21 organise so many things, socially, football, walking,
 22 you know, walked up Snowdon, Macmillan cake sales --
 23 it's a very, very good department, very social, across
 24 planning and, you know, then Building Control as well.
 25 You know, we would have Christmas, we would bring stuff

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1 in, all sit round, eat together, and all those kind of
 2 things, so it wasn't a culture you would say would be
 3 bullying at all.
 4 Q. Had anyone else ever raised concerns over the culture
 5 within the department?
 6 A. Not while I was the manager, not culture necessarily.
 7 There's going to be people who have odd grievances and
 8 issues, you know, as people do and they're fully
 9 entitled to voice those if they need to, you know.
 10 Q. What about before you were the manager?
 11 A. There would be. I can't say, I can't recall.
 12 Q. You say odd grievances and issues; in the time that you
 13 were the manager, were you made aware of any grievances
 14 by others?
 15 A. There was one that was followed through, and it was --
 16 there was nothing found, and the nature of the grievance
 17 procedure, which is right, I guess, but it feels that
 18 when then nothing happens, because it's followed through
 19 by senior colleagues and personnel, and I'm obviously
 20 the person -- there was a grievance, it wasn't with
 21 John Hoban, but you feel a little bit -- when then
 22 there's just nothing found or the person says,
 23 "Actually, I want to stop", you feel a bit -- because
 24 you would like to get more to the bottom of it,
 25 you know, and find out what it is. I can't recall what

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1 the issue was now, actually, but ...
 2 MS GROGAN: Mr Chairman, that's an appropriate moment for us
 3 to pause for lunch.
 4 SIR MARTIN MOORE-BICK: Right. Yes. How are we getting on?
 5 MS GROGAN: We have made decent headway. I will look over
 6 lunch as to how we're getting on, but I will need
 7 Mr Allen after lunch, and I will consult with Ms Grange
 8 and Mr Millett about how we're doing for the rest of the
 9 afternoon.
 10 SIR MARTIN MOORE-BICK: All right, thank you very much.
 11 Well, Mr Allen, as you heard, we're going to have
 12 a break now so we can all get some lunch.
 13 THE WITNESS: Of course.
 14 SIR MARTIN MOORE-BICK: We will come back at 2.05, please,
 15 and please don't talk to anyone about your evidence or
 16 anything to do with it while you're out of the room.
 17 All right?
 18 THE WITNESS: Okay, thank you.
 19 SIR MARTIN MOORE-BICK: Would you like to go with the usher
 20 now.
 21 THE WITNESS: Yes, of course.
 22 (Pause)
 23 SIR MARTIN MOORE-BICK: Good, thank you. 2.05, please.
 24 (1.05 pm)
 25 (The short adjournment)

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1 (2.05 pm)
 2 SIR MARTIN MOORE-BICK: Right, Mr Allen, ready to carry on?
 3 THE WITNESS: Yes, thank you.
 4 SIR MARTIN MOORE-BICK: Good, thank you.
 5 Yes, Ms Grogan.
 6 MS GROGAN: Thank you.
 7 Mr Allen, we were discussing Mr Hoban just before
 8 the lunch adjournment.
 9 Mr Hoban has said in his witness statement that he
 10 decided that he would endeavour to conduct site visits
 11 about once a month, and we've checked the records, and
 12 between his first visit on 29 August 2014 and his last
 13 visit on 7 July 2016 he did on average visit site once
 14 a month, albeit there was a gap in summer 2015 and we
 15 think another gap in 2016, as the job was nearing
 16 completion. We have established that from the records.
 17 I'm interested in your recollection of events.
 18 Did Mr Hoban ever say to you that he wished to visit
 19 site more frequently but was not able to do so at
 20 Grenfell?
 21 A. No.
 22 Q. Did you ever form the view that Mr Hoban needed to visit
 23 site more frequently?
 24 A. No.
 25 Q. Did you ever check how often he was visiting site?

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1 A. No.
 2 Q. Did you ever refer to Acolaid to look?
 3 A. I can't recall doing so.
 4 Q. Did Mr Hoban ever say to you that did he not have the
 5 time to undertake comprehensive site visits at
 6 Grenfell Tower?
 7 A. No.
 8 Q. Were you aware that he did not visit site between
 9 15 May 2015 and 17 August 2015 because he was
 10 prioritising other projects that had recently been
 11 allocated to him?
 12 A. I wasn't aware he didn't attend that time, and I wasn't
 13 aware that he was doing that because he was prioritising
 14 other projects.
 15 Q. So that didn't come up at any of your weekly or monthly
 16 chats with him at the time?
 17 A. No.
 18 Q. Did you ever consider reassigning the Grenfell project
 19 to another surveyor after you had assigned it to
 20 Mr Hoban?
 21 A. I don't believe so.
 22 Q. Did he ever say to you that he did not have enough time
 23 to check the compliance of the documentation he was sent
 24 relating to the refurbishment?
 25 A. No.

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1 Q. Mr Hoban said that he resigned from RBKC because he had
 2 had enough and he was finding it impossible to do the
 3 job that he was trained to do. Were you aware at the
 4 time that Mr Hoban felt this way?
 5 A. Not that, but I could add for a while John had said that
 6 he wanted to retire, and so I was -- I didn't want him
 7 to retire because there was a shortage of
 8 Building Control officers, it's very difficult to get
 9 new people in of sort of the level of competence that
 10 you need. But if that was his wish, I was talking to
 11 him for -- over a couple of years because he did want to
 12 retire before that time. So I did, for example, send --
 13 there is a preparation for retirement course, so he can
 14 get the best out of his retirement.
 15 Q. You say you knew he wanted to retire; did you know that
 16 that was one of the reasons why, that he was fed up?
 17 A. No, he never explained -- John was a very private
 18 person, so if he wanted to retire, obviously I knew
 19 about his mother, but other than that, I wouldn't --
 20 some people wish to speak about more personal things,
 21 but that's their personal life and, as a manager, you go
 22 as far as the person wants you to go into their personal
 23 life.
 24 Q. I'm now going to ask you about the means of escape group
 25 within RBKC Building Control.

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1 We know that there was a means of escape group that
 2 could be consulted by Building Control officers, and we
 3 heard from John Hoban that historically there was a fire
 4 regulations group that would deal with all part B
 5 matters, but that this changed at some point prior to
 6 the restructuring in 2013. Is that correct?
 7 A. I think it's a long way before that, actually, and
 8 I wouldn't say the other group -- it was a group of --
 9 they called themselves -- what did they call themselves?
 10 It was a group called BREG, which is
 11 Building Regulations Engineering Group, so I wouldn't
 12 say it was necessarily all part B matters, but there was
 13 a group in existence that dealt with, like, mechanical
 14 type stuff. Now --
 15 Q. Did it deal with fire safety in the context of
 16 Building Control?
 17 A. It was a Building Control group, and they dealt with the
 18 mechanical engineering, emergency lighting, ventilation,
 19 you know, that kind of stuff.
 20 Q. Do you know when the change took place, when it
 21 changed --
 22 A. I don't. So I joined in 1996 and we was in another
 23 building away from the town hall at the time, so I can
 24 picture where they were and I can remember some of the
 25 people in the team. I think it was -- there would be

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1 a matter of record on this, but I know some of the
 2 people that was in the group -- I say know them, I knew
 3 them through work. But I think it was at the time that
 4 Terry Ward was the district surveyor, so that was the
 5 leader of Building Control before John Jackson.
 6 Q. So some time before --
 7 A. That would be my estimation, yeah.
 8 Q. Sorry, some time well before 2013?
 9 A. Yeah, I would probably say around the millennium,
 10 I would say, but I haven't got it clear in my head at
 11 the moment.
 12 Q. In 2012, the means of escape group comprised Paul Hanson
 13 and Dave Gammon; is that right?
 14 A. Yeah, there was, as I mentioned, a time when Celia Burt
 15 was being trained to help with that group, with
 16 a view -- I think that was for succession reasons, that
 17 was the word I was looking for earlier.
 18 Q. Was she a trained fire engineer?
 19 A. No.
 20 Q. After the restructuring, is it correct that the means of
 21 escape group was only Paul Hanson?
 22 A. I believe so, yeah.
 23 Q. He was a qualified fire engineer, wasn't he?
 24 A. I'm not actually sure, to be honest with you. I know he
 25 did do some of the parts of his qualification before

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1 I believe I was the Building Control manager, so you
 2 might need to check that, but he was dealing with fire
 3 engineering matters.
 4 Q. Was he full-time?
 5 A. Yes.
 6 Q. Is it correct that he also worked on projects for other
 7 boroughs, so it wasn't exclusively RBKC work?
 8 A. Yeah, but he's full-time for RBKC. What I would say is,
 9 just to expand a little, it's quite unusual to have
 10 a specialist group in Building Control. Most local
 11 authorities in the country wouldn't have a specialist to
 12 consult. Some London boroughs do, including that BREG
 13 group that I was talking about earlier. So clearly with
 14 a smaller team, that role still needs to justify, both
 15 by workload and income, its position.
 16 So with the ebbs and flows of work that was coming
 17 in and larger projects, we would offer the facility to
 18 other Building Control departments to check their
 19 projects to fill those gaps and justify the role.
 20 Q. So the work for other Building Control bodies was a bit
 21 of a moneymaker?
 22 A. Not necessarily moneymaker; it might be more just
 23 occupying that role and utilising it. We wouldn't want
 24 to make a loss on it, but we weren't probably that
 25 detailed about it. But it was about generating income

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1 for the service, but not -- to justify the role as well
 2 so we had the benefit of someone like Paul.
 3 Q. And he was expected to do that work outside of his
 4 contractual hours, was he?
 5 A. No, no, no, no --
 6 Q. Within his contractual hours?
 7 A. Contractual, fully, and over the years, the surveyors
 8 didn't have to use Paul. If they did, obviously he
 9 would help give advice on B1 and B5 matters. As you
 10 know, B1 is means of escape and B5 is access for
 11 firefighting and the like. And there were times, and
 12 it's minuted in team meetings, where I asked that minor
 13 enquiries come to me or José because Paul had a lot at
 14 that time, a lot of larger projects in, and sometimes
 15 with the workflow on those larger projects, it might be
 16 that he's made a lot of -- put a lot of points out, but
 17 then suddenly all the amendments come in at one time to
 18 review. So it's a case of, like, managing that
 19 workflow.
 20 Q. Were you his line manager?
 21 A. Yes. They all direct -- after the -- when I took over,
 22 I had all direct reports. There was no line, it was me
 23 and all the others, so it was very flat.
 24 Q. Is there a reason why the resource for a qualified fire
 25 engineer was not used more widely, for example for B4

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1 issues as well?
 2 A. Well, it was fully used on B1 and B5. There is some
 3 history. It was mainly around the consultation with the
 4 fire authority. You're probably aware there is
 5 a standard form that's used between the LDSA and the
 6 London fire authority, and that only relates to B1 and
 7 B5. There may be some history why there was
 8 a separation further back than that, but I'm not aware
 9 of it, but to my knowledge it was always B1 and B5,
 10 although it's like complicated things, there are
 11 sometimes other aspects that cross over. So,
 12 for example, if you're dealing with means of escape,
 13 there may be issues to do with ventilation or fire
 14 dampers across the means of escape route, and that could
 15 arguably cross into, say, B3 or B2.
 16 Q. So the answer there is that you don't know why he
 17 wouldn't be used for B2, 3 and 4?
 18 A. No, I do know why, because he was fully used -- utilised
 19 for B1 and B5 and that was his role, and that was his
 20 area of expertise, and he didn't necessarily have
 21 expertise in those other areas.
 22 Q. So he was at capacity just doing B1 and B5?
 23 A. Capacity, and that was his area of expertise, not in B2,
 24 B3 and B4, he didn't have experience in that.
 25 Q. If we can go to {RBK00036051}, this is a job description

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1 for a "Senior Building Control Surveyor (Fire
2 Regulations)". Sorry, I've given you the wrong
3 reference there. Can we start with {RBK00036050}, first
4 of all. So this is the email accompanying it. If we
5 zoom in, it's from you to Paul Hanson, dated
6 19 May 2015:
7 "Paul, first draft attached of revised job
8 description for your post.
9 "I have incorporated the information that you sent
10 to me ..."
11 Then you say you will forward it for evaluation.
12 If we could go to {RBK00036051}, that was the
13 attachment.
14 It says that the purpose of the job is:
15 "To provide expert technical advice to clients and
16 Building Control Staff on fire related regulations.
17 "To provide advice to clients on major projects
18 utilising fire engineering techniques."
19 If we go on to page 2 {RBK00036051/2}, so this is
20 under the "Main Responsibilities" section, we see there
21 top bullet:
22 "To generally advise and assist Building Control
23 Surveyors in respect of fire safety matters."
24 And one below:
25 "To keep aware of and investigate new products,

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1 systems and methods and formulate policies for them."
2 Was the idea that Mr Hanson's role would be expanded
3 to cover all aspects of part B at this time?
4 A. No.
5 Q. Why were you revising Mr Hanson's job description in
6 May 2015?
7 A. It's not necessarily Mr Hanson's job description, it's
8 the job description that is for the post, clearly, and
9 the purpose of it was to seek to get a pay rise for
10 Paul Hanson. He was doing work of a level and
11 complexity that was above the remuneration that he was
12 receiving, and I wanted to reward him for what he was
13 doing and also then retain him. In the industry, he
14 could earn a lot more than he was doing working for us
15 and he was underpaid.
16 Q. If we could go back to the first page, and I'll just let
17 you look at that to yourself, and if you just let me
18 know when you have finished reading that --
19 A. I would have to --
20 Q. Zoom in a bit.
21 A. Your colleague over here will zoom it in, but I can't
22 read it at the moment.
23 (Pause)
24 Yeah.
25 Q. And just on to the next page, so you can finish reading.

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1 (Pause)
2 A. Yeah.
3 Q. So it doesn't say there that the role is limited to
4 giving advice on B1 and B5.
5 A. Correct.
6 Q. Was it the intention that he was to be giving advice on
7 more than B1 and B5 after this --
8 A. Not other than I said previously in relation to -- it
9 mentioned here smoke vents and matters to do with, like,
10 smoke dampers, insofar as they relate to B1 and B5.
11 Q. Why in particular did the role involve keeping aware of
12 new products and systems?
13 A. Partly to make sure that the role fitted the pay grade
14 that I was seeking to pay him at, and also because it
15 did reflect some of the work that he was doing in
16 relation to -- more probably smoke venting and things
17 like that, but some of the work that he was doing. It
18 doesn't mean from that that he was giving advice on
19 every single fire-related product to Building Control
20 and he was the source for that, and I can't think of
21 many situations at all where he would have actually done
22 that.
23 Q. So it wasn't the intention that Paul Hanson would be
24 used as a resource if a product was being proposed on
25 any project that he would check it?

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1 A. No. No.
2 Q. Was his role ultimately amended to reflect this job
3 description?
4 A. I believe so. We did manage to secure the pay rise,
5 which was good.
6 Q. Do you agree that it was a failure on the part of RBKC
7 not to have used the resource of a qualified fire
8 engineer for the benefit of the Building Control
9 department as a whole?
10 A. The way you phrase the question, I agree that we had
11 an expert in the department, and we used him
12 appropriately on the projects that he worked on.
13 Q. Do you agree that the working relationship between the
14 means of escape group and the other parts of the
15 Building Control department were undefined and unclear
16 to those involved?
17 A. No.
18 Q. Do you agree that this way of working did not
19 necessarily support project surveyors reaching the most
20 appropriate decisions in relation to part B, schedule 1
21 of the Building Regulations?
22 A. Well, I don't agree with the question. I agree that
23 part of the question in relation to B1 and B5 and those
24 other aspects that I mentioned, they did help surveyors
25 do that, but clearly his role -- well, to me the role

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1 wasn't for B2, B3 and B4, so he wasn't there to support
 2 them for that.

3 Q. Was it the case that B2, B3 and B4 were less complicated
 4 or difficult to understand so that you felt you could
 5 entrust them to surveyors to implement on their own?

6 A. No, I think it's more to do with the history of that
 7 group to start with, and it could have been -- you know,
 8 with time, it may have evolved differently. And as
 9 I mentioned at the start, having a -- I've worked in
 10 three different authorities, and two of those had
 11 a means of escape group on the same basis as this.
 12 I joined another one that didn't have one, and then
 13 I was then the expert for means of escape, and then when
 14 I went back to the authority I worked at before, they
 15 had then lost the means of escape group, so it was back
 16 for the surveyors to do it.

17 So it's not -- it would be a very small percentage
 18 of Building Control offices in the country that would
 19 have a specialist means of escape in-house. I would
 20 say, what, probably, 5% max, I would say.

21 Q. If we could now go to {RBK00059350}. So this is
 22 an email from Paul Hanson to you dated 31 December 2013,
 23 and it says:
 24 "Hi John,
 25 "Re fire doors claims, I have attached an old BSI

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1 doc which goes [through] some of the misleading claims
 2 manufacturers sometimes make. Although it is pre EN
 3 standards it is still relevant.

4 "Please circulate if [you] feel it is useful to
 5 surveyors."

6 Can you recall why he sent that to you at the time?

7 A. Just it was a culture in the department to share
 8 information with colleagues.

9 Q. Did you circulate it on to other surveyors?

10 A. You would need to check. I may have done. I have
 11 since, and I may have -- obviously I would have seen the
 12 document at the time. I believe as part of the evidence
 13 I've -- I think you may have shown it previously. It's
 14 actually -- it's more for laypeople, this document, than
 15 Building Control staff. We're used to people that
 16 aren't specialists using incorrect terms. They use
 17 words like "fireproof" and things like this, which
 18 doesn't mean anything, and that's what the purpose of it
 19 was, but it's more to kind of general public awareness,
 20 and sometimes manufacturers may use the wrong terms
 21 because they just -- through ignorance, but -- so it
 22 wasn't really aimed at Building Control, but I would --
 23 knowing how I work, I would say I would have circulated
 24 it, but I'm sure you could find an email trail for it
 25 if ...

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1 Q. If we go to the guide, it's {RBK00059351}, and we see it
 2 there. Did you read that document in December 2013 when
 3 it was sent to you?

4 A. Probably, and I have read it since, I did see it in some
 5 of the evidence that appeared.

6 Q. So when you say you read it since, it must have been you
 7 read it over the weekend after seeing Mr Hoban's
 8 evidence?

9 A. Yeah, I think it was produced, I can't recall, it's all
 10 getting a bit of a blur, but I did read it at some
 11 point.

12 Q. If we go to page 2 {RBK00059351/2}, please, the column
 13 on the right, if we zoom in on the "Interlocking
 14 cladding" paragraph. Under the heading "Interlocking
 15 cladding", it states the claim "It's fireproof
 16 (grade 'O')", and then goes on to explain what national
 17 class 0 means.

18 Were you aware of confusion in the industry around
 19 what national class 0 actually meant at the time?

20 A. As an example, not wishing to be patronising, in the
 21 industry it's known as "class O", as an example, and
 22 I know in the Inquiry we refer to it as "class 0". That
 23 would be an example why this document is important, it's
 24 exactly because of that, because people use terms
 25 incorrectly.

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1 Q. So you were aware at the time of the confusion --

2 A. Within laypeople. It's not really for --

3 Building Control would know. This is the whole point of
 4 people trying -- industry and people trying to justify
 5 something, as I used the example of "fireproof".

6 Q. So are you saying there was no confusion within the
 7 Building Control --

8 A. Correct.

9 Q. -- professionals about what --

10 A. Correct, which is why things like firestop and
 11 cavity barriers is clear for Building Control people,
 12 it's in the -- and fire resistance and external,
 13 you know, spread of flame and these kind of things are
 14 clear terms, whereas the term here is something that
 15 manufacturers or laypeople use.

16 Q. What about in the construction industry, so construction
 17 professionals, were they confused, did you experience
 18 that?

19 A. It's a -- that's a big question, and we're talking of
 20 thousands of people that I would have dealt with. So
 21 there's some really good people in construction, top
 22 builders, some really good people, but there's really
 23 some bad people even with top builders, so there is
 24 a whole cross-section.

25 Q. So some confusion sometimes depending on ...

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1 A. Well, there would be, yeah, clearly, yeah.

2 Q. Can we now go to {INQ00014085}. I expect you will have
3 seen this before if you were paying close attention to
4 Mr Hoban's evidence.

5 This is a blog post from the LABC website dated
6 15 March 2017, titled, "What's the difference between
7 fire proof and fire resistant?" Did you see that blog
8 post at the time?

9 A. Not probably at the time.

10 Q. The first paragraph there, if we zoom in on the text,
11 refers to the flaming liability document that we have
12 just discussed, and then the second paragraph:

13 "Terminology plays an important role in our
14 industry; however the misuse of common phrases can lead
15 to a complete misunderstanding regarding the suitability
16 of products for a particular application and could
17 result in fatal consequences."

18 If we go over the page {INQ00014085/2}, we then see
19 that it goes on to explain the difference between
20 fireproof, fire retardant and FR. Under the heading
21 "FR" it says:

22 "This is sometimes used particularly by architects
23 and building control surveyors as shorthand to mean
24 'fire resisting'. This is acceptable, provided all
25 parties understand that 'FR' means 'fire resisting' to

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1 [the relevant test] ...

2 "Although the manufacturer, specifier and installer
3 each have a responsibility to ensure the correct product
4 is used for the correct application, it commonly falls
5 to the building control surveyor to spot that the wrong
6 product is being used for the wrong application."

7 Do you agree with that?

8 A. It's what I was saying earlier about the function. One
9 of the things is to check to make sure -- you look at
10 the Building Regulations, work out what particular
11 properties or function the material's got to be used,
12 and make sure it's exactly that test that the product
13 data or -- you know, the product and the test
14 certificate. But that's all outlined in regulation 7
15 about fitness of materials. It gives a whole sequence
16 of acceptability of products and then also of
17 workmanship.

18 Q. Yes, it's also --

19 A. In regulation 7 it just runs through all of that. It
20 says you could use past experience in there, if you know
21 the products as well, but that's laid out in the
22 regulation.

23 Q. And you would agree it's also referred to in ADB, that
24 you need to interrogate products and materials?

25 A. As I said, yeah, I agree.

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1 Q. So this blog post didn't tell you anything you didn't
2 already know at that time; is that right?

3 A. No, but you'd have to see where it was circulated. The
4 blog post probably went -- it was probably meant for --
5 LABC, who I've worked for the last two years, that would
6 be for the industry and for, you know, residents and
7 clients, householders and those kind of people.

8 Q. I'm going to ask my question again. Your evidence is
9 that this blog post didn't -- not that you saw it at the
10 time, but it's not saying anything that you didn't know
11 at the time, is it?

12 A. Correct.

13 Q. If we just go over the next page {INQ00014085/3} to the
14 last three paragraphs, it says right at the top:

15 "If the test standard is for something different to
16 that claimed, then the product is not suitable for the
17 intended application.

18 "If a term is used such as FR, fire retardant or
19 fire proof that are not defined by a test, be very
20 suspicious.

21 "So almost 30 years on, the sentiment of the BSI
22 leaflet remains just as relevant; 'Don't be a flaming
23 liability'. It frequently falls to the last link in the
24 chain - the building control surveyor - to spot the
25 problem; however, this just confirms the valuable

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1 contribution that a diligent surveyor can bring to the
2 design and construction team."

3 So we can take it, then, based on your evidence,
4 that you knew that, as at December 2013, BCOs should not
5 take manufacturers' claims about fire performance at
6 face value.

7 A. Correct.

8 Q. Mr Hoban had never done a residential high-rise before,
9 we know that, he had never done a high-rise rainscreen
10 project before; how did you feel comfortable with him
11 making assessments about product information and
12 compliance of products with the Building Regulations at
13 the time?

14 A. Could I -- it's a long question. The start of it, you
15 said he has never done a high-rise residential before.

16 Q. A residential high-rise project before.

17 A. Yeah, well, he has done high-rise residential. What do
18 you regard as high-rise? What's the definition?

19 Q. I may have mis-summarised his evidence. He had never
20 done a high-rise rainscreen project before.

21 A. Thank you, yeah.

22 Q. That's not controversial.

23 Thinking about Mr Hoban specifically, so not
24 Building Control surveyors generally --

25 A. Yes.

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1 Q. -- what gave you confidence that he was able to
 2 interrogate manufacturers' information to the requisite
 3 level of skill and care?
 4 A. Because he's the senior Building Control surveyor, I had
 5 every faith and confidence in his ability. It's a core
 6 function to first of all look in the
 7 Building Regulations and work out what is the
 8 requirement that applies in the particular circumstance,
 9 and then looking up the data and making sure that
 10 element of it is as the Building Regulations, in
 11 whatever certificate you're looking at. And it's
 12 outlined as well in regulation 7, you know, it's
 13 a standard part of Building Control life.
 14 Q. Can you explain then how it is that Celotex ended up on
 15 this building?
 16 A. I don't know at all what the reference -- and it's quite
 17 a wide question that you're saying. So how -- and
 18 that's a very complicated question that you've asked.
 19 Simple as I -- I wouldn't know how the Celotex has come
 20 to be on the building. I mean, going through it, so
 21 presumably a builder's put it there, that's responsible
 22 for -- so the people carrying out the work, the builder
 23 and architect, the responsibility for compliance, the
 24 first stage is they need to make sure that it complies
 25 with the Building Regulations.

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1 Q. Perhaps I can put my question a different way.
 2 A. It's quite vague.
 3 Q. Well, how is it that Mr Hoban did not, as you said at
 4 the beginning of your evidence, go back and say to the
 5 design team and Rydon, "This insulation doesn't comply
 6 with 12.7 of ADB"? Can you account for how that
 7 happened?
 8 A. Well, I can't, other than what we've already said. It's
 9 for the Building Control officer to look at the -- work
 10 out the requirements of the Building Regulations and
 11 then, if he has been given the information, and I've --
 12 I don't -- I have been trying to follow the previous
 13 hearing, so if he has been given information about what
 14 product is going to be used and then he has had the test
 15 data, then he should be checking that. So I don't know
 16 when -- when was he given the information?
 17 Q. Mr Hoban's evidence was that he looked up information
 18 about Celotex online, and I can go to the two documents
 19 we think he may have seen, although he was unable to
 20 help us with whether he did in fact see them. The first
 21 one is {CEL00000010}. This is the LABC registered
 22 system detail for RS5000 PIR insulation board. You will
 23 see at the top there it says, "PIR Insulation Board
 24 (Rainscreen Application)" and then there is an asterisk
 25 that leads to the words "With Limitation" at the bottom.

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1 If you had been the Building Control surveyor
 2 looking at this, would you have gone on to investigate
 3 what those limitations were?
 4 A. Well, this is a registered system, first of all.
 5 I would have probably seen as well if there is an actual
 6 test certificate for the product as well.
 7 Q. Had you seen a test certificate, would you have looked
 8 to make sure that the context in which the insulation
 9 was being constructed matched what had been tested?
 10 A. As we said before, absolutely, yeah.
 11 Q. Can you account for why Mr Hoban did not do that?
 12 A. I can't. I know you've asked him.
 13 Q. Do you accept that that's a failure of supervision on
 14 your part?
 15 A. I -- the supervision I carried out, and I could talk
 16 about the -- my experience both when I was a special
 17 projects manager or at any time, it's very much about
 18 the -- it's just a single Building Control surveyor
 19 would be inspecting the works on site and checking the
 20 plans. It's not usual in any place I've worked to have
 21 a second check or somebody, like, going out in twos or
 22 checking the plans, that's not usual. Some -- and
 23 that's the case still today as far as I understand it,
 24 but I know you have experts that could ask that of
 25 Building Control. There are some that now do a second

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1 check, but it wasn't the place when I was being managed
 2 and when I was managing.
 3 Q. Mr Allen, the evidence you have given is that you think
 4 this is all very clear and it's something that you were
 5 certainly aware of --
 6 A. Yes.
 7 Q. -- and knowledgeable about at the time. Can you explain
 8 why Mr Hoban, whose training you were in part
 9 responsible for, was not aware of any of these things?
 10 A. You say I was in part responsible for his training;
 11 I didn't have that in my job description about training
 12 the staff, as far as I remember, but we've spoken about
 13 training at length. The surveyors were responsible for
 14 their project. If they -- and I had every confidence in
 15 their ability. If they had any doubts, they was doing
 16 something new, hadn't done it, were unsure, then they
 17 could ask me.
 18 I may not have known the answer to all the questions
 19 they come with, but if I didn't know, I knew a lot of
 20 people that I could ask that may know, including around
 21 London and nationally, or, as I did, I would contact the
 22 CLG, the Building Regulations division, which I had the
 23 names of all the people there for the different parts of
 24 the regulations, to ask them for their interpretation,
 25 and that's how -- because not -- you know, people can't

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1 know every single thing.

2 Q. Could we go to the next Celotex document, which is

3 {CEL000000412}. So this is the product datasheet for

4 Celotex RS5000.

5 Just out of interest, had you ever had cause to look

6 at this datasheet in your work between 2013 and 2016?

7 A. I may have done. I can't recall what I saw then and

8 what I know now, you know, it all blurs in, so probably.

9 Q. If we zoom in on the first paragraph, it says:

10 "Celotex RS5000 is our premium performance PIR

11 solution for use in rainscreen cladding systems.

12 Developed specifically to enhance the thermal

13 performance ..."

14 It goes on there to say that it:

15 "... is the first PIR insulation board to meet the

16 performance criteria in BR 135 for insulated rainscreen

17 cladding systems and therefore is acceptable for use in

18 buildings above 18 metres in height."

19 Had you read that at the time, would you have gone

20 on to ask yourself, "I wonder what system has been

21 tested, I should check that it matches"?

22 A. Of course.

23 Q. Mr Hoban's evidence is that he did not do that, and

24 again, is that not a failure on your part to make sure

25 that he was competent to be able to scrutinise documents

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1 like this?

2 A. Well, the answer is the level of supervision there -- in

3 my experience, we've never had accompanied visits.

4 I was there as a resource. I would have monthly

5 meetings, at times weekly meetings, and I would be there

6 to help them, and the system in place, both in our

7 procedures for dealing with full plans applications,

8 which I think you mentioned in previous evidence, the

9 procedure we have wasn't for a second check or sign-off,

10 and that was the procedure that I was following, and

11 also followed when I was being managed before I was the

12 Building Control manager.

13 Q. Mr Hoban also didn't interrogate the claims on the

14 BBA certificate in respect of the ACM panels. You were

15 his line manager. Do you accept that you failed to

16 ensure that he was sufficiently aware of the need to

17 check the test evidence in respect of all materials used

18 on Grenfell Tower's cladding system?

19 A. Well, as I said, the first thing is for the

20 Building Control officer to check the requirements of

21 the Building Regulations, in part B in this case, and

22 then to check whatever the product is against their test

23 certificate and make sure that's the case.

24 Q. Did you even know what materials were being used in the

25 cladding on Grenfell at the time?

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1 A. At the time, I didn't know the detail of the project

2 because I wasn't responsible in dealing with that

3 project, apart from the period when I was looking at the

4 pre-application meeting, and, as I said, there wasn't

5 a process at the time of second checking.

6 Q. So you didn't know it was ACM?

7 A. I wouldn't have known.

8 Q. You didn't know it was Celotex?

9 A. I wouldn't have known.

10 Q. You wouldn't or you didn't?

11 A. I don't think I knew. I don't have a recollection of

12 knowing, because I wouldn't check the detail.

13 I wouldn't have checked the plans on the Grenfell

14 project because it wasn't a project that I was looking

15 after at that time.

16 Q. But you would obviously have expected Mr Hoban to check

17 and know what materials were being used?

18 A. Yes, I don't know if -- are we going to talk about

19 inspections?

20 Q. We will get on to site visits later.

21 A. Okay.

22 Q. So moving on to the full plans application.

23 A. Yeah.

24 Q. Do you agree that a BCB, so Building Control body, would

25 not generally accept a full plans application as being

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1 valid without the fee and/or information being attached?

2 A. The term you've used, in this case it isn't

3 a Building Control body, it was only local authority --

4 it's only local authorities that full plans applications

5 go to, it's not approved inspectors. But for a local

6 authority, which obviously RBKC is, I would expect

7 them -- the question said would you expect a validation

8 and an acknowledgement, did you, from when the

9 application comes in?

10 Q. But would you expect it to be valid when it comes in

11 in paper if the drawings are not attached? So if it comes

12 in in paper with no drawings, would you validate that?

13 A. You need to look at what the requirement is of a -- to

14 put in a -- there is guidance about full plans

15 applications in the Building Regulations, and it's not

16 like a planning application where all the information

17 necessarily needs to be there right at the start. So

18 predominantly you need an application -- I think the

19 only minimum legal requirement, and you would need to

20 check, is to have an application form, obviously the

21 correct payment, and site plan. There's usually some

22 information to start with. Often on design and builds

23 you may have structural calculations, for example.

24 Q. So if there is just a form and no information at all, is

25 that, in your view, a valid application?

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1 A. Providing they had the correct fee, yes, because the
 2 environment is such that you want to receive the
 3 application, it may have been an application,
 4 particularly if it's a sizeable project, that you have
 5 probably been speaking to them pre-application for
 6 a couple of years, so you may have that pre-application,
 7 some pre-application information, which is -- if we're
 8 going back to this one, for Grenfell, there was some
 9 pre-application information in advance of that.

10 Q. You say "the environment is such that you want to
 11 receive the application", is that a reference to the
 12 competition between approved inspectors and --

13 A. Of course, yeah. You may have been seeking -- we're
 14 talking generally, you may have been seeking that
 15 application for a number of years, so getting the cheque
 16 and the application is the kind of -- it means you have
 17 then won that project, and then obviously you can
 18 request the information through time as it becomes
 19 available.

20 Q. So on the Grenfell project, if we go to {RYD00014378} --

21 SIR MARTIN MOORE-BICK: Sorry, can you just help me,
 22 Mr Allen, I was under the impression that a full plans
 23 application required, as the name suggests, full plans
 24 and that the regulations had some reference to this. Am
 25 I wrong about that?

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1 A. I would need to see the regulation, but I believe that's
 2 not the case. There is a terminology, "full plans",
 3 there is a different process to building notice or
 4 regularisation certificate. So it just talks more about
 5 the different process. Full plans is more around -- by
 6 the time it's approved, there is a full body of
 7 information, and then there is a requirement to check
 8 that within a statutory time period and issue a formal
 9 decision. That's not the case on the building notice.

10 It's unlike planning. In planning you need to have
 11 all the information. If it's not there, it's rejected,
 12 it doesn't go any further. That's not the case. We try
 13 and work with the applicants to get the application in
 14 and then get the information, all the way through to
 15 when it's finally built.

16 SIR MARTIN MOORE-BICK: All, thank you.

17 Sorry, Ms Grogan, to interrupt you.

18 MS GROGAN: If we go now to {RYD00014378}, that's an email
 19 from Bruce Soules to you:

20 "Dear John,
 21 "Further to your email last Tuesday please see
 22 attached the completed Full Plans application form for
 23 Grenfell Tower. Hard copy and drawings to follow."

24 Was that receipt of the form sufficient to start the
 25 statutory time period running?

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1 A. You need the fee, you need the application fee as well.

2 Q. So once the fee is paid, that's what starts the clock
 3 ticking?

4 A. The fee and the application form, yeah.

5 Q. If we can now go to paragraph 14 of your statement, it's
 6 {RBK00033930/3}, and zoom in there, you say, starting
 7 with the second sentence:

8 "In recent years with 'design and build', project
 9 information often arrived in stages throughout the
 10 build. Statutory time limits regarding approval or
 11 conditional approval or rejection were not usually
 12 adhered to in practice. In theory if no decision was
 13 made the application would be 'deemed' approved but in
 14 reality no applicant ever took this point."

15 Were you aware that, on Grenfell, the drawings
 16 accompanying the full plans application were not sent to
 17 Building Control at all during the five-week period?

18 A. I wasn't aware that it was in the five-week period, but
 19 I do believe drawings were sent at some point.

20 Q. Was it common on projects at this time that you would
 21 receive the application form and the fee and then
 22 drawings would be delayed by weeks beyond the statutory
 23 time limit?

24 A. It could be.

25 Q. Why not reject the full plans application at that stage?

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1 A. You could have done. There's a -- the process while
 2 I was Building Control manager and before my time as
 3 Building Control manager, there was a system in place
 4 for ensuring that applications received a decision
 5 within the statutory time period which, as you know, is
 6 five weeks, or two months if the applicant agrees. This
 7 was before my time as well. But for larger projects,
 8 that time process just doesn't fit with the way that
 9 their information comes through. So there is no benefit
 10 in rejecting. I'll explain a little bit more about why
 11 there is no benefit in rejecting the application. There
 12 is no benefit in sending a rejection because it doesn't
 13 really achieve too much. And the reason why there is
 14 not too much benefit in doing that is because, unlike
 15 planning, you are probably aware that you can build on
 16 a rejected plan. So the upshot of saying you're going
 17 to reject it is that they can still build on a rejected
 18 plan and you can still issue a completion certificate on
 19 a rejected plan, whereas, you know, in the planning
 20 process, as far as I'm aware, because I'm not a planner,
 21 you can't start work until you have a planning
 22 permission.

23 Q. Is the need to secure work in competition with approved
 24 inspectors related to this practice of not rejecting?

25 A. No, not at all. It's more about just trying to work

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1 with people and get to the best solution as quickly as
 2 you can and try and help people through the process.
 3 Q. Throwing the book at them --
 4 SIR MARTIN MOORE-BICK: Sorry, would it be uncharitable,
 5 then, to conclude that no one is really following the
 6 regulation so far as the administration is concerned?
 7 A. For larger projects, the time just doesn't fit. The
 8 information just isn't available. So, for example, on
 9 other projects, you may just have -- for example,
 10 piling -- if it was a new-build, you may just have the
 11 piling calculations, say, first up, but it's very
 12 much -- it's not a process of -- I mean, they don't need
 13 to. People don't generally wait until they have all the
 14 information -- some years ago, it may have been like
 15 that, but they don't wait until they have all the
 16 information absolutely nailed down before they then make
 17 the decision.
 18 Clearly, if I was building myself, building in my
 19 own house, I would want the thing approved and done
 20 before I started, but they take a view on risk and just
 21 get on with it.
 22 SIR MARTIN MOORE-BICK: So I think what you are telling us
 23 is that the regulations haven't kept up with building
 24 practice and so they are not complied with?
 25 A. Well, there isn't a -- we could reject, and some

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1 Building Controls do reject, and what I would say --
 2 many years ago, there was the process, when I first
 3 started, I wasn't the head, where they were rejected.
 4 So the process you had, a plan would come in and be
 5 rejected, they would send some more information and it
 6 would be rejected, or you end up doing a part
 7 application and say, "Okay, we're just going to change
 8 the description, we're going to put the application in
 9 just for the piling". Sometimes you had a situation
 10 where the client wanted to withdraw the application
 11 before the rejection because they didn't want the
 12 rejection. So you had this re-submission of full plans
 13 applications, resubmission, resubmission, resubmission,
 14 and the process just becomes all around for everybody
 15 laborious. So it's just a practical way.
 16 SIR MARTIN MOORE-BICK: That's helpful, I just wanted to
 17 understand, though, what the position is, and I think
 18 you have made that clear. Thank you.
 19 A. Okay, thank you.
 20 SIR MARTIN MOORE-BICK: Sorry.
 21 MS GROGAN: You have referred to the application being
 22 deemed approved if there is no response within
 23 five weeks. What do you mean by "deemed approved"?
 24 A. These first two pages, as you know, for the Inquiry,
 25 there were a number of questions that were asked, and

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1 this two pages was a kind of supplement just to kind of
 2 try and explain it and help you, that was the purpose of
 3 it. The "deemed approved", why it's in speech marks, is
 4 first of all it's under section 36 of the Building Act,
 5 if you either have approved -- if Building Control have
 6 either approved an application or failed to give
 7 a decision in time, the applicant is allowed to build in
 8 accordance with those plans, and if you then decide --
 9 basically you can't take action under 36, although you
 10 could take an injunction against them.

11 Now, on all those counts, if anyone in my experience
 12 has ever -- if the period has gone over five weeks or
 13 two months, no one's ever actually claimed that. But
 14 you could still take an injunction, but with the
 15 injunction, if it was found that the work was then okay,
 16 it's the local authority then would have to pay the cost
 17 of doing that, as far as I understand it.

18 So the "deemed approved" was just a term which I had
 19 heard in the past as well when I was training, just
 20 to -- I was just trying to explain it to you and help.

21 Q. If we could go to {RBK00048693}, and I'm just looking at
 22 the dates here of these documents. So if you zoom in on
 23 the email at the top, that's an email from Mr Hoban to
 24 Mr Hanson dated 29 September 2014, and he is asking
 25 there, in the context of the full plans application, for

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1 Mr Hanson's observations under part B.

2 We can then see Paul Hanson's reply at
 3 {RBK00033895}, the date is on the front,
 4 10 November 2014.

5 Can you explain why it took Paul Hanson over a month
 6 to respond to John Hoban? So that's his response.

7 A. Well, allied to what you're asking me, and I give the
 8 example with Grenfell and the time limits,
 9 Building Control have got an excellent relationship with
 10 the fire authority and the fire service and we hold them
 11 in high regard. There are statutory time limits for the
 12 fire authority to deal with Building Control
 13 applications which, from memory, is either two weeks or
 14 three weeks. For most large projects it is several
 15 months, three months, six months, that kind of time. So
 16 it's just not possible to do a satisfactory consultation
 17 and get it back within five weeks and two months, it's
 18 not possible.

19 Ideally, if all the information was in, you sent it
 20 off to the Brigade, they got back in two weeks,
 21 you know, there was a lead -- possible, but their lead
 22 times are something like, or they were when I was
 23 involved on larger projects, that order, three to
 24 six months, which is why on Grenfell there was, from
 25 memory -- I think I've seen it, either in the evidence

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1 or in ... we arranged to do a consultation on the smoke
 2 vent, but that was all kind of to try and help them.
 3 That was all pre-application. Technically you shouldn't
 4 do it pre-application, but that was just trying to move
 5 something forward to help everybody, you know.
 6 Q. That doesn't quite answer my question, which is: can you
 7 explain why Paul Hanson took over a month to reply? Do
 8 you know or do you not know?
 9 A. Well, it would be in his workflow, as far as the
 10 complexity of the information he had and the projects he
 11 had at the time, but that wouldn't seem like
 12 an unreasonable length of time for the complexity of the
 13 response that he has given. I'm sure you've seen the
 14 level of response that he gives.
 15 Q. Moving on now to your involvement with Grenfell Tower.
 16 A. Yeah.
 17 Q. You have said in your statement that you had some very
 18 limited involvement in a pre-application enquiry
 19 concerning the smoke control system, and for the
 20 transcript that's paragraph 20 of your statement
 21 {RBK00033930/4}, and that you think John Jackson asked
 22 you to contact Terry Ashton from Exova Warrington.
 23 Did you contact Terry Ashton at that stage?
 24 A. I think that was my recollection. I believe that
 25 Terry Ashton may have worked in a district surveyors

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1 office that John was working in, so may have known him
 2 and he may have made contact, but that could be totally
 3 wrong as well. But I think that was the starting point,
 4 somebody contacted me or I contacted them because they
 5 wanted a pre-application -- some pre-application advice.
 6 Q. Can you recall what you discussed with Terry Ashton?
 7 A. Well, I would have put him in contact with my
 8 colleagues, which was either Dave Gammon or Paul Hanson.
 9 There was a question, I believe, about the smoke
 10 ventilation system.
 11 Q. At that time -- so this is 2012 -- were you aware that
 12 the Grenfell project was going to involve re-cladding?
 13 A. No.
 14 Q. When did you become aware?
 15 A. I believe when the full plan application come in.
 16 Q. So up to that point, you didn't know --
 17 A. I don't believe so.
 18 Q. -- that cladding was involved?
 19 A. Because I think you may have -- there was some ... when
 20 I said pre-application, there was a number of
 21 pre-application meetings, I think there might have been
 22 a demolition, and all of that was recorded in Acolaid.
 23 We wanted, you know, a hard record of all this stuff.
 24 So there would be a description on the Acolaid database
 25 of whatever the project was, and I don't believe that

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1 cladding was mentioned on the application form, or we
 2 mentioned it anyhow, until, you know, we repeated it for
 3 the full plan application.
 4 Q. We know there was a meeting between you, Studio E and
 5 Exova on 7 November 2012. We do have minutes of that
 6 meeting but we don't need to pull them up. I'm just
 7 interested in your recollection.
 8 At that meeting, when you were meeting to discuss
 9 the project, was cladding ever referred to?
 10 A. I don't believe so. There are minutes of the meeting.
 11 I can't actually recall the meeting at all.
 12 Q. You then received two versions of the Exova outline fire
 13 safety strategy. I'm only going to ask you about
 14 version 2, but for the transcript, you received the
 15 first version on 31 October 2012 and the reference for
 16 that is {EXO00001368}.
 17 In 2013, so we have moved forward in time, you
 18 received version 2, and that's {SEA00009805/2}, and this
 19 says:
 20 "Dear John and Paul,
 21 "Further to our meeting at RBKC on 17 August we are
 22 now in a position to forward [you] our proposed fire
 23 strategy for Grenfell Tower for comment. Please see
 24 attached fire strategy ..."
 25 A. Sorry, can you start again, it wasn't large enough.

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1 It's fine now, but it wasn't ...
 2 Q. Sorry, it's the first paragraph there, just saying they
 3 have attached the fire strategy for comment, and you
 4 will see the attachments there include the
 5 Grenfell Tower OFSS.
 6 A. Yeah.
 7 Q. If we now go to the OFSS, which is {EXO00000430}, do you
 8 recall reading this document at the time?
 9 A. I can't recall, at all.
 10 Q. If we look at page 4 {EXO00000430/4} of that document.
 11 Now, in fairness to you, cladding proposals are not
 12 mentioned there, in the list of what the refurbishment
 13 comprises, and at this point in time, can you help us on
 14 whether you knew, even in broad terms, whether cladding
 15 was involved?
 16 A. I don't believe I did.
 17 Q. If we could go on to page 8 {EXO00000430/8}, under
 18 3.1.4, "Compliance with B4", it says:
 19 "It is considered that the proposed changes will
 20 have no adverse effect on the building in relation to
 21 external fire spread but this will be confirmed by
 22 an analysis in a future issue of this report."
 23 Did you read that at the time?
 24 A. I may have done, I can't recall.
 25 Q. Did you note that a future analysis was to be

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1 forthcoming?

2 A. I can't say I did. I just can't recall, I'm afraid.

3 Q. Looking at that document now, assuming that you read

4 this passage at the time, would you have noted to check

5 with Exova at a later date that they had provided this

6 updated analysis?

7 A. Of course, but not necessarily on this vehicle. You'd

8 be doing a check of the Building Regulation application

9 and having a schedule and an amendment letter and then

10 working through that. So if then cladding was added to

11 the application, then clearly that would be -- if you

12 didn't have the information for it that complied in all

13 the ways that we have spoken about earlier, then you'd

14 obviously ask them for the information.

15 It's not necessarily the fire engineer, it would be

16 whoever the applicant is you would be writing to,

17 because it's their application. That's one of their

18 consultants, and maybe the information would come from

19 somebody else.

20 Q. Now, moving forward in time again, we have heard that

21 John Hoban took over from you in December 2013. He said

22 to the Inquiry in his oral evidence that you sent him

23 some emails but there was no handover meeting. Do you

24 have a specific recollection of a handover meeting

25 taking place?

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1 A. I can't. It was pre-application at this stage so the

2 Building Regulation application hadn't then deposited,

3 so if I would have forwarded emails, they would be the

4 correspondence that chiefly was from the means of escape

5 group and the correspondence such as this.

6 Q. Do you think it's right, then, that there was no

7 handover meeting?

8 A. There probably wasn't anything to hand over because

9 there wasn't an application to hand over.

10 Q. Once John Hoban took over and before the site visit that

11 you carried out on 24 March, what involvement did you

12 have with Grenfell Tower?

13 A. I can't recall any. Oh, saying that, there were some

14 email exchanges with Janice Wray, I think, but I can't

15 recall at the time. It had to do with some gas risers

16 or something.

17 Q. That was after --

18 A. Was it after? Yeah, I can't recall the time.

19 Q. Juts check my notes ...

20 A. And there could be people asking me things, but

21 I haven't got any recollection of it.

22 Q. Did John Hoban ever discuss the specifics of

23 Grenfell Tower with you?

24 A. No. In our meetings, we just spoke about progress, so

25 there is an odd note saying, "How's Grenfell?" or

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1 something in my planner, in relation to checking it and

2 those kind of things.

3 Q. Were you aware of how often he was visiting site?

4 A. No.

5 Q. Did he ever tell you that he had been informed that the

6 cladding had been used on other buildings of a similar

7 construction?

8 A. No.

9 Q. As a Building Control surveyor yourself, would you have

10 taken comfort if someone had told you that?

11 A. No, it does mention in regulation 7 you can use past

12 experience if that's the case, but generally speaking

13 you wouldn't trust what anybody's saying to you. Even

14 if they've said they've used it, and I could give you

15 other examples if you wish, but you would pursue those

16 other examples, and often people actually lie and that's

17 not the case. You know, they -- it's normally

18 a different scenario and, as I say, I can think of at

19 least two examples where things I've asked for, someone

20 says, "Oh, it's unfair, we've done it somewhere else",

21 and then you look at that case and it's just a different

22 case or they've lied about it.

23 Q. You went to site, then, on 24 March 2016.

24 A. Yeah.

25 Q. What steps did you take to re-familiarise yourself with

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1 the project before this site visit?

2 A. I can't say. I can't -- I can barely remember the

3 inspection and I can't recall the context of why I was

4 going there. It come out in some evidence in the last

5 couple of days or sometime that I was requested to look

6 at the nursery. I think there was some evidence saying

7 they wanted me to -- so it was a request from the

8 builder to look at the nursery, but I can't recall the

9 timeframe or how long I had and why I went there and

10 John Hoban hadn't gone there, but I presume he was on

11 leave or in the meeting or on a course or something.

12 Q. We'll go to your notes of the site visit in a moment.

13 A. Yes, but just to say about the timeframe, it depends.

14 So if somebody -- and it does happen, there may be a

15 book of calls that somebody's got, and they phone in the

16 morning and say, "I'm sick", so it's 9.30 and the first

17 visit's 10.00, so you just go out and look at it as you

18 do. So I don't know in this particular situation

19 whether I had time to look at any of the information,

20 but generally speaking, if I did, I probably would have

21 looked at the site inspections I would say in advance,

22 if I could.

23 Q. By this stage -- this is well after the full plans

24 application -- you knew that the project involved

25 cladding.

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1 A. Well, I would have done. It was on the application
 2 form, and if I checked it, it would have been booked in,
 3 you know, so it would have said cladding, yeah.
 4 Q. But you didn't at that stage ask Mr Hoban or look for
 5 any records to see what the cladding actually comprised
 6 of?
 7 A. No.
 8 Q. When you went on site, how long did you spend there?
 9 A. I don't know. Most sites you have to sign in and out.
 10 I don't know if you have been able to get a record of
 11 how long I was there.
 12 Q. I'm interested in your recollection. Can you recall how
 13 long you spent there?
 14 A. I would recollect probably a couple of hours, certainly
 15 between one and two hours, I would say.
 16 Q. Do you think you looked at the hard copy file back at
 17 RBKC before you went?
 18 A. Well, we know now there wasn't too much of a hard copy
 19 file, and you wouldn't necessarily take the drawings
 20 on site. We wouldn't want people to do so, because the
 21 files are too large, and moving around London, apart
 22 from things like climbing ladders, it's just not
 23 practical to walk around with drawings.
 24 Q. Mr Allen, we don't know what state the hard copy file
 25 was in because it's gone.

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1 A. Oh, sorry. That's what I'm saying, yeah, so I -- yeah.
 2 Q. What's your recollection? Did you look?
 3 A. I may have looked at Paul Hanson's means of escape file.
 4 I can't recall looking at -- if you're asking me,
 5 I can't recall looking at a hard copy file.
 6 Q. Did you speak with anyone on site when you went?
 7 A. I can't recall. I would have done. You can't make
 8 visits on your own on building sites because of the
 9 safety restrictions, you're always accompanied by and
 10 large.
 11 Q. Can we look at your notes, then, {RBK00052478/3}. So
 12 this is a print-out or summary of what the notes on
 13 Acolaid are all in one place, and you will see that's
 14 your visit there in the second box. It says:
 15 "Notes: Cladding nearly complete."
 16 Did you go up the mast climbers to look at the
 17 cladding?
 18 A. I don't believe so. This is March 2016. Looking at the
 19 other correspondence, I think it was finished, was it,
 20 in June or July sometime, if we went up, it's probably
 21 June or July. Presumably people have photographs to
 22 show whether there was mast climbers in position at this
 23 point. I can't -- I wouldn't have gone up the
 24 mast climber. I can't recall doing it, and I don't know
 25 if the mast climbers were in position or not. But you

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1 could probably look at some photographic evidence and do
 2 a timeline.
 3 Q. When you observed the cladding, which you obviously did
 4 because you have noted it's nearly complete, did you say
 5 to yourself: that looks like ACM?
 6 A. I wouldn't be aware how to externally differentiate the
 7 difference. I'm not sure many people could, so --
 8 Q. Did you ask anyone on site what the cladding was made up
 9 of?
 10 A. I did, and it was -- it may be that the -- this is
 11 an area where maybe the mast climbers had been taken
 12 down and there was just some isolated, you know, gaps
 13 that just, you know, clearly need to be filled.
 14 Q. You say you did ask --
 15 A. No.
 16 Q. -- in the transcript, or did you mean to say you didn't?
 17 A. No, no, well, I've asked here, by saying "Ensure thermal
 18 insulation completely fills voids".
 19 Q. That's not an answer to my question --
 20 A. Sorry.
 21 Q. -- which is did you ask what the cladding was made of?
 22 A. No, I didn't.
 23 Q. Did you ask what the insulation was made of?
 24 A. No.
 25 Q. You observed the insulation; did you form any view about

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1 what it might be made of?
 2 A. I can't recall what it was at all.
 3 Q. When you say there "Ensure thermal insulation completely
 4 fills voids", what was that in reference to?
 5 A. It was from the ground, I could see there was some gaps
 6 in the cladding or the insulation, and I was making sure
 7 that the thermal envelope is complete.
 8 Q. So you yourself weren't interested at all in whether the
 9 façade itself was compliant with the Building
 10 Regulations?
 11 A. I didn't say that.
 12 Q. Well, you didn't ask what it was, so you weren't going
 13 to be able to form a view, were you?
 14 A. No, but that's not the -- the question you asked, was
 15 I interested in whether the façade is -- could you
 16 repeat the question you said, sorry?
 17 Q. I asked you: you yourself weren't interested at all in
 18 whether the façade itself was compliant with the
 19 Building Regulations.
 20 A. Well, as a whole, of course you're interested. In
 21 relation to that particular visit, I was asked to come
 22 and look, as it turns out, at the nursery, and as I was
 23 passing, there was -- it was obvious that the cladding,
 24 because there was some gaps in it from the ground level
 25 looking up, there were some gaps which clearly need to

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1 be filled . Then you're asking me whether I was
 2 interested ; well , of course you're interested because
 3 the building's there . It doesn't mean then you go and
 4 check every single element on each inspection you do .
 5 Q. Did you take --
 6 A. For example, the structure , the floors , the new floors
 7 that were put in , I wouldn't suddenly start unearthing
 8 those , or ...
 9 Q. Did you take any steps at all to satisfy yourself in any
 10 way whether the façade was compliant?
 11 A. Well , that wasn't , I don't believe , the purpose of that
 12 inspection , and as I was trying to say , there's other
 13 elements that are life safety in relation to the
 14 building , such as the concrete floors , fire , you know ,
 15 dry risers , fire alarms , smoke ventilation , emergency
 16 lighting , all of these things , and it doesn't mean each
 17 time you do a visit , you go over and check all those
 18 elements again .
 19 Q. Why didn't you check the compliance of the insulation
 20 for yourself?
 21 A. Well , it's not the time to do it there . As I said , you
 22 wouldn't go and each time a visit is requested , you do
 23 an audit of each element that's been looked at
 24 previously .
 25 Q. You don't think you checked the file , you don't think

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1 you had a conversation with Mr Hoban about what was
 2 being installed on the tower , and so you come to site
 3 and you don't ask anyone or ask yourself whether or not
 4 the façade complies with part B4 of the regulations ; why
 5 is that?
 6 A. Each time you do an inspection , it is an audit of the
 7 whole building , and just to repeat what I said ,
 8 for example , there was new concrete floors put in , so
 9 obviously the structure would be important as well . It
 10 doesn't mean then you unearth the reinforcement and
 11 start going through the structure . There wasn't too
 12 many notes about the structural floors in the notes , or
 13 any other element . You see it as it is at the time .
 14 SIR MARTIN MOORE-BICK: Yes , Mr Allen , I was going to ask
 15 you this : you obviously noted that the cladding was
 16 nearly complete , because you included that in your note .
 17 A. Yeah .
 18 SIR MARTIN MOORE-BICK: So something struck you worth
 19 noting .
 20 A. Well , there would be a hole , you know .
 21 SIR MARTIN MOORE-BICK: Well , that's my question . Can you
 22 remember what you did notice about the cladding?
 23 A. Not at all .
 24 SIR MARTIN MOORE-BICK: I mean , were there panels missing?
 25 Was there insulation exposed? Do you recall?

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1 A. This is looking from the ground , and I can't even
 2 recall -- you know , I haven't got a picture in my head
 3 now of where I was . I can't even picture how I got into
 4 the building , you know , I just can't -- I've got no
 5 recollection . So I would be guessing to fill in the
 6 gaps as far as what those notes say .
 7 SIR MARTIN MOORE-BICK: All right .
 8 Yes , Ms Grogan .
 9 MS GROGAN: Thank you .
 10 Go to {RBK00018811} , please . That's a copy of the
 11 completion certificate with your signature on it .
 12 Were you involved at all in the decision to issue
 13 a completion certificate ?
 14 A. No , the process is laid out in the full plan procedure
 15 that now I think you have referred to previously .
 16 Q. Were you involved in the --
 17 A. Not so much , just in the background .
 18 Q. -- issue of this certificate ?
 19 A. No , because , as I say , it wasn't in our full plan
 20 procedure , there wasn't a process for me to be involved
 21 in the signing off of the completion certificate , so as
 22 in all cases and this case , that's an electronic
 23 signature that's generated once the surveyor is happy
 24 that the works comply with the Building Regulations .
 25 Q. So it's in your name , but you didn't have anything to do

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1 with it?
 2 A. That's correct .
 3 Q. Mr Hoban described a process whereby a surveyor would
 4 check with those on site whether regulation 38 of the
 5 Building Regulations had been complied with , and he
 6 described a practice in your department whereby
 7 surveyors would seek an oral assurance from the
 8 contractor that regulation 38 had been complied with but
 9 they didn't check independently . Is that an accurate
 10 description of the practice within RBKC?
 11 A. Yeah , you'll be aware that regulation 38 to do with
 12 fire safety information , it was regulation 16B prior to
 13 that which is referred to in the approved document that
 14 was valid at the time , 16B , and there is an appendix at
 15 the back of the approved document , I don't know if we've
 16 got time to go it , but appendix G , I think it is , and it
 17 outlines the fire safety information . But
 18 regulation 38 , because , you know , it's quite a short
 19 regulation , but -- and I haven't got the words here .
 20 Have you got regulation 38 on screen? I could summarise
 21 anyway .
 22 Q. It's a short question , Mr Allen : was there a practice in
 23 your department of just asking --
 24 A. No , but it's important that I explain the context .
 25 Regulation 38 is about the person that has carried out

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1 the work has got to hand fire safety information to the
 2 kind of owner or occupier. That's what it basically
 3 says. It doesn't say Building Control are kind of in
 4 the loop on that. What would typically happen -- and
 5 I do agree with John Hoban -- typically on site you
 6 would make sure -- there is like usually -- I think they
 7 call them O&M manual, with all the operational and
 8 maintenance manuals, you want to make sure --
 9 particularly if the client was there, bearing in mind
 10 this was the TMO, you would usually have some
 11 conversation with the site office, "Have you had the
 12 information?" It wouldn't be a forensic examination to
 13 make sure, for example -- as you know, Building Control
 14 don't get as-built drawings at the end of a job, but
 15 as-built drawings are one of the things in the
 16 fire safety information. So you wouldn't kind of have
 17 the drawings and forensically look at it to make sure
 18 it's exactly as was built, necessarily, but it's making
 19 sure that one has passed it to the other, and if he has
 20 done that, I'd say that was adequate.
 21 Q. Compliance with regulation 38 is a prerequisite for
 22 a completion certificate pursuant to regulation 17 being
 23 issued?
 24 A. Yes.
 25 Q. Why not ask for a statement in writing from the

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1 contractor that they had done it?
 2 A. You could. There isn't a requirement to do that, but
 3 asking for a statement, as we know, with what
 4 information you're provided, it doesn't mean that's been
 5 done. You know, I would say, and I don't know the
 6 context, I would usually check with the clients, if they
 7 were on site, which they often are towards the end of
 8 a job, "Have you received the information?", and
 9 clearly -- I mean, did they on this particular project?
 10 Do you know if the TMO did receive the fire safety
 11 information? Is it theoretical? Is this a -- did it
 12 happen, is the question? Did the TMO get the
 13 fire safety information or are we just -- is it
 14 a theoretical question?
 15 Q. Following the Grenfell Tower fire, was any internal
 16 investigation ever carried out by the Building Control
 17 department into how and why Building Control approval
 18 had been granted for the refurbishment works?
 19 A. I don't believe so. There would be a legal review by
 20 the legal team, but you would have to speak to RBKC's
 21 legal team about that.
 22 Q. Can you account for how a completion certificate was
 23 issued in circumstances where it is now accepted that
 24 the cladding did not comply with B4 of the Building
 25 Regulations?

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1 A. Well, because the Building Control officer at the time
 2 believed the work, as far as he could ascertain,
 3 complied with the Building Regulations and, as I've
 4 mentioned previously, the responsibility for compliance
 5 with the Building Regulations remains with the people
 6 carrying out the work, which is usually the builder, the
 7 architect and in some cases can be the owner.
 8 Q. Can you account for how Mr Hoban made some fundamental
 9 errors whilst on your watch?
 10 A. I saw Mr Hoban's evidence yesterday. He carried out his
 11 work to the best of his ability and he believed the work
 12 complied with the Building Regulations.
 13 Q. I just have one final topic to cover with you, Mr Allen,
 14 and then we will take a pause to see if there are any
 15 further questions that need to be asked.
 16 A. Okay.
 17 Q. We talked before about the culture within RBKC
 18 Building Control department. Are you aware of any
 19 occasion when a building surveyor raised issues with
 20 an unmanageable workload in the department prior to the
 21 Grenfell fire?
 22 A. Back before my time as Building Control manager, it was
 23 often a thing between surveyors around, as you have
 24 mentioned before, job numbers, or he's got these
 25 projects and he's got those, and he completes his

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1 records, he doesn't, and that was well before my time as
 2 the manager, or it wasn't even in the section I was in.
 3 So it's something that's happened, you know, now and
 4 again over the years, but the main point would be that
 5 the workload was manageable, definitely.
 6 As an example, which I was thinking about during the
 7 break, there was times where I had to establish a late
 8 cover because people used to go home so early. So it
 9 was more about trying, you know, to have at least
 10 somebody there to answer phones and things. That was
 11 more the issue. People didn't do more hours than was
 12 needed to.
 13 Q. What about safety concerns, are you aware of anyone
 14 having raised safety concerns?
 15 A. No, I was at various times the health and safety manager
 16 for the whole of planning and borough development, it
 17 was something I was very, very keen on, so we had health
 18 and safety briefings, Toolbox Talks, I made sure all the
 19 PPE was up to date, I've mentioned some health and
 20 safety things today, I think, in the giving of the
 21 evidence.
 22 Q. Were you aware that it had been said that there was
 23 a culture of bullying and surveyors' concerns were not
 24 taken seriously when raised?
 25 A. No.

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1 Q. I'm now going to show you a document. It's
 2 {RBK00014152}. If we zoom in on the top half, please.
 3 This is an email from Robert Albrow dated 16 June 2017.
 4 I'm not suggesting that you saw this particular email at
 5 the time, it's to Graham Stallwood, and he says:
 6 "Dear Graham (Private and Confidential),
 7 "Following the tragic events at Grenfell Tower,
 8 I wish to offer my unconditional support to the Building
 9 Control officer concerned. I worked for RBKC as
 10 a Senior Building Control Surveyor for many years and
 11 mostly had a positive time.
 12 "It is however with regret that I feel the need to
 13 repeat the concerns I had with the Management Team at
 14 the time all of which are well documented."
 15 He goes on:
 16 "I sincerely believe Surveyors concerns were never
 17 taken seriously. On one occasion, I utilised the
 18 Councils Whistle Blowing Policy. Even then the
 19 Management Team failed to follow the panels
 20 'recommendations' and acted contrary to published
 21 guidance. I even recall being told if a Corporate
 22 Manslaughter Charge was to be brought it would be the
 23 Head of Building Control who would be liable not
 24 myself."
 25 Then we move on to the next paragraph, which is now

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1 at the top:
 2 "I am also in possession of documentation whereby
 3 I specifically asked a builder to 'open up' an element
 4 of work to later find John Allen undermined my decision
 5 and approved the work without speaking to me about this
 6 issues. At the time, I asked John to make a site note
 7 to this effect which he failed to do. To cover my back,
 8 I sent him an email, the response I got was that it was
 9 inappropriate to enter an email dialogue when he's sat
 10 in the next room. I read this to mean no paper trail.
 11 Needless to say, the note never got recorded.
 12 "You will also observe I questioned 'workloads'
 13 across the department."
 14 A little further down, at the bottom of the page,
 15 the last paragraph that we can see on screen, it says:
 16 "Be under no illusions, I believe the department is
 17 afflicted by a culture of bullying and surveyor's
 18 concerns are not taken seriously when raised."
 19 Were you aware of those issues being raised at the
 20 time?
 21 A. Well, I disagree with the whole essence of it. I was
 22 aware of this correspondence or something like it.
 23 I could talk personally about Rob Albrow, if you wish me
 24 to, and quite a long -- there were various
 25 disciplinarys and grievance and things went over with

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1 personnel for quite a long time. I could give you some
 2 background. I did employ him to start with as part of
 3 the management team and I was helping him at one stage
 4 when he come from another team to the team that
 5 I managed, so I could talk at length about that if you
 6 wish, but safe to say that the context I refute
 7 absolutely.
 8 Q. I would just like you to answer my questions.
 9 Were you aware prior to the restructuring of
 10 concerns about safety not being taken seriously?
 11 A. Absolutely not.
 12 Q. Were you aware of concerns with workload before the
 13 restructuring?
 14 A. Other than what I've said, it's an office and there is
 15 swings -- you know, there is times -- work ebbs and
 16 flows, the patch system has got the nature of that. The
 17 reason it worked, the patch system, is because clients
 18 wanted the one point of contact all the time, but then
 19 there's pros and cons about that. But we tried to
 20 manage the work when it did ebb and flow.
 21 Q. Prior to your appointment as manager of Building
 22 Control, was there a culture of bullying in the
 23 department?
 24 A. I don't believe so.
 25 MS GROGAN: Thank you, Mr Allen, those are all the questions

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1 I have for you, but we have to take a pause now as there
 2 may be some more from others.
 3 SIR MARTIN MOORE-BICK: Right, Mr Allen, as you have heard,
 4 counsel has reached the end of the questions she had for
 5 you, but we need to take a break now just to make sure
 6 nothing has been overlooked, and to consider any
 7 questions that may have come in from other sources.
 8 We will stop now until 3.35, and then if you come
 9 back, we will see if there are any more questions or
 10 not.
 11 THE WITNESS: Understood, thank you very much.
 12 SIR MARTIN MOORE-BICK: Thank you very much. Would you like
 13 to go with the usher, please. Thank you.
 14 (Pause)
 15 3.35, please. Thank you.
 16 (3.20 pm)
 17 (A short break)
 18 (3.35 pm)
 19 SIR MARTIN MOORE-BICK: All right, Mr Allen?
 20 THE WITNESS: Yes, thank you.
 21 SIR MARTIN MOORE-BICK: Now, Ms Grogan, did you find some
 22 questions?
 23 MS GROGAN: I did, Mr Chairman, just a few.
 24 SIR MARTIN MOORE-BICK: Yes.
 25 MS GROGAN: First, we have heard some evidence that Mr Hoban

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1 was not provided with a copy of the NBS specification
2 for the project, and I think you referred to that
3 earlier in your evidence as well, that you had never
4 seen the NBS specification.

5 Is it standard practice for Building Control not to
6 have the NBS specification on a project?

7 A. I don't know what the NBS specification is. Does it
8 stand for -- is it national building standards
9 specification or something? What does it stand for?

10 Q. Yes, so that's the specification that lists out what
11 products are being installed.

12 A. So the short answer is probably no. What often people
13 do on projects, because you don't need often to know
14 incredible detail, phone numbers of manufacturers and
15 things like that, you may be given the plans, and then
16 often architects would do kind of a supplementary
17 statement explaining how they have kind of complied with
18 regulations, that would often be the case, and then go
19 into detail as needed. But going through a very
20 detailed -- the submission can be plans or specification
21 drawings, it can be anything. So we will take whatever
22 people are going to offer to us and ascertain whether it
23 complies with the Building Regulations or not, and if it
24 doesn't, ideally write a schedule.

25 Q. In the absence after complete list of the materials that

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1 are being used, for example, on a façade --

2 A. Yes.

3 Q. -- how is the Building Control surveyor supposed to
4 assess a full plans application?

5 A. Well, it would be difficult to, but you would ask for
6 it, that's the thing. So in your schedules you would
7 ask for the information if it wasn't there.

8 Q. Going back, just before the break we were discussing the
9 email from Mr Albrow. If we could go to another email,
10 which is {RBK00032518/2}. You will see there another
11 email from him dated 7 July 2017, and you are copied in.
12 If we zoom in so that you can see it, do you recall
13 receiving that email at the time?

14 A. I can't. I know there were -- and I said I'm happy to
15 go into some detail, if you wish, over many years with
16 various involvement I had, but do you want me -- shall
17 I just read it?

18 Q. I just have one question for you. So he says, if I just
19 find the right part of the email ...

20 If we could go down to the next paragraph, please.

21 A. What date is this one, sorry?

22 Q. 7 July.

23 A. Okay.

24 Q. It's the third paragraph down, and a few lines down it
25 says:

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1 "I have asked that my statement be accepted that
2 many related to a previous grievance which had not
3 actioned. Safety concerns raised under the whistle
4 blowing policy and the departments view to take
5 a direction contrary to published guidance and finally,
6 your role [and he's referring to you there] to undermine
7 my decision when I gave an instruction for defective
8 work to be opened up. This includes [correspondence]
9 between us in which you failed to enter a site note to
10 that effect. Indeed you said if I wanted to talk to
11 you, to go to your office rather than send an email.
12 I maintain the view this was to avoid accountability."

13 Is it correct that you instructed Mr Albrow to raise
14 matters orally with you rather than in writing?

15 A. In part, but could I explain the context? He was in
16 another team and there was a disciplinary being taken
17 against him by management which they asked me to lead,
18 so I was doing that, then it was kind of dropped at one
19 point. But I welcomed him into one of the teams that
20 I managed at the time. This was before I was
21 Building Control manager; I was assistant district
22 surveyor then.

23 He was still pursuing some grievances he had with
24 a previous manager, and in the end I said, "Okay, we
25 will give you one day a week to deal with the grievance,

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1 but you can't be dealing with it all the time in the
2 office", and often -- at that time I did have my own
3 separate office, and I found it just uncomfortable where
4 you're sitting there and someone is sending you an email
5 and they're only the other side of the office, and
6 I just said to him, "If you have an issue, please come
7 and talk to me about it", and it was just mainly to help
8 him.

9 What I would say is about the decision, some people
10 in Building Control sometimes find it difficult to make
11 decisions, and Robert was one of those. So on certain
12 jobs -- it's not about overruling him; I'm the senior
13 manager, and sometimes if I just feel that the element
14 complies, then obviously I can just pass it, even though
15 it may be against what he's advised, which in my opinion
16 was incorrect and not in accordance with knowledge I had
17 at the time.

18 So I would -- Rob had his issues. I tried to help
19 him as much as I possibly could. He did leave
20 the council in the end. I can explain the circumstances
21 of that, but I don't actually know all of that, but it
22 was more -- a lot above my level.

23 Q. In the context of record-keeping on a job, which is what
24 he is referring to here, did you say to him that he
25 should just talk to you about this site note issue

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1 rather than email?

2 A. No, not on -- no, no, not about site notes, I was

3 talking to him about if he's got an issue with me or

4 a problem, don't email me, come and talk to me about it,

5 because he would be sitting there all day long doing it.

6 As I said, we tried to say, "Okay, can you just have a

7 day a week dealing with your grievances", which seemed

8 a reasonable amount of time, you know.

9 Q. Going back to some evidence we heard from you this

10 morning, I asked you whether the core of an ACM panel

11 would be thought of as filler under 12.7 of ADB.

12 A. Yeah.

13 Q. You replied with reference to the insulation that would

14 be installed behind the panels.

15 Could you just tell us, what did you understand at

16 the time the word "filler" to mean in 12.7 of ADB?

17 A. As I mentioned, my understanding was the filler is

18 anything then that's going to be -- in the line of the

19 insulation, anything that's going to fill it. It could

20 be -- there are various intumescent mastics, foam, those

21 kind of things, that maybe there are small gaps on the

22 line of the insulation.

23 As I mentioned, it's been qualified both by the

24 extra -- in the latest Approved Document B, volume 1,

25 there is a note been added that now says, in the opinion

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1 of the Government, that they did mean "filler" to

2 include the material between the ACM, so that's cleared

3 it up now, but that wasn't my understanding at the time.

4 Q. We also discussed your knowledge of the proposals in

5 that pre-application stage for Grenfell Tower. If you

6 could go to {SEA00004471}. You will see at the bottom

7 of the page there is an email from Bruce Sounes to you

8 dated 6 June 2012, and it says:

9 "John,

10 "Further to our conversation please see attached an

11 initial estimate of the work. You will see it exceeds

12 the budget ... but it does give you an idea of the scope

13 of the work."

14 So that's Mr Sounes sending you an email with some

15 details so that you could come up with a fee. Do you

16 recall that?

17 A. I don't, but the fees would have been tied in with

18 a project quote. So if you look at the --

19 pre-application on Acolaid was "PA", it kind of makes

20 sense, and project quote was "PQ", so I would've

21 recorded the project quote in Acolaid.

22 Q. If you go up to the top of the page, we can see your

23 response, and there you advise on the fee and you say

24 you have excluded items such as demolition that are not

25 controlled under the Building Regulations.

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1 A. Yeah.

2 Q. So can we take it that you went through the budget cost

3 estimate to work out what the Building Control fee would

4 be?

5 A. Yes. So I'm not sure what he sent through. You

6 wouldn't want a, you know, bill of quantities or full

7 specification, but if someone gave you outline budgets,

8 you would just say, like, landscaping out, anything to

9 do with the building in, that kind of level. I'm not

10 sure what was included.

11 Q. So if you go to {ART00000053/4}, this is what he sent

12 you. Under item R, which we see there, it says:

13 "Option 1: New cladding including insulation (allow

14 say VMZinc Rain screen ...

15 "Option 2: New Render ..."

16 Having looked at this for the purposes of preparing

17 the Building Control fee, you were told at the time that

18 cladding was going to be involved as part of the

19 refurbishment project.

20 A. Yeah, I can't recall. I can't recall the document. If

21 it was sent and I had read all of it, then I would have

22 known, but I didn't know at the time.

23 Q. So that didn't jump out at you at the time?

24 A. No.

25 Q. Would cladding works have featured in the calculation of

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1 the Building Control fee?

2 A. It would have been included. That 1.124 million would

3 have included in whatever the figure was -- was it

4 4 million, was it? I would have --

5 Q. So you would likely have read it, noted the cost and

6 that would have featured in your assessment?

7 A. I believe so, yeah.

8 Q. So, at the time, you did know that cladding --

9 A. Well, from what you have shown me now. I can't recall

10 the document, but ...

11 Q. Final set of questions. This is relating back to your

12 site visit.

13 Now, we know that you did see some of the insulation

14 in the cladding on site. That was your evidence before

15 the break.

16 Now, you're an experienced Building Control officer.

17 You have gone on site and you see being installed hard

18 board insulation, not mineral wool.

19 A. I couldn't recall at all what the insulation was, I just

20 couldn't -- I haven't got any recollection of it now.

21 Q. But you noted it in your site reports that you saw it --

22 A. Saw insulation.

23 Q. -- so we know you saw it at the time, the insulation,

24 the cladding.

25 A. Yeah.

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1 Q. What you would have seen is insulation board rather than
2 mineral wool. Would that not have piqued your interest
3 at the time to ask, "What is this?"
4 A. I can't recall. I honestly can't recall. I have no
5 recollection of what I saw. If I say something now,
6 I can't -- it would be guessing. I can't say. I don't
7 have a recollection at this time.
8 MS GROGAN: That's all I have, Mr Chairman.
9 SIR MARTIN MOORE-BICK: Right, thank you very much.
10 Well, Mr Allen, that is the end of the questions,
11 nothing else to ask you, thank you very much.
12 It just remains for me to thank you very much for
13 coming to give your evidence. It's been very helpful
14 and useful, and now you are free to go.
15 THE WITNESS: Thank you very much.
16 SIR MARTIN MOORE-BICK: I'm sorry we have taken longer, by
17 the way, over your evidence than we first hoped, but
18 I am afraid that's sometimes how things go.
19 THE WITNESS: Not at all, I was glad to help.
20 SIR MARTIN MOORE-BICK: Thank you.
21 (The witness withdrew)
22 SIR MARTIN MOORE-BICK: Well, now, we have another witness
23 waiting, but we need to rise for a moment, I think, for
24 a bit of housekeeping. Isn't that right?
25 MS GROGAN: We do, that's right, and then Mr Millett will be

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1 taking over.
2 SIR MARTIN MOORE-BICK: If someone can come and find us as
3 soon as it's all been done.
4 MS GROGAN: Yes.
5 SIR MARTIN MOORE-BICK: Thank you very much.
6 (3.48 pm)
7 (A short break)
8 (3.55 pm)
9 SIR MARTIN MOORE-BICK: Yes, Mr Millett, who is your next
10 witness?
11 MR MILLETT: Mr Chairman, we now have the first of the
12 Artelia witnesses, Mr Simon Cash. Can I please call
13 Mr Cash.
14 MR SIMON CASH (affirmed)
15 SIR MARTIN MOORE-BICK: Thank you very much, Mr Cash. Sit
16 down, make yourself comfortable.
17 THE WITNESS: Thank you.
18 SIR MARTIN MOORE-BICK: I think you have probably been here
19 quite a long time waiting to give evidence.
20 THE WITNESS: I have.
21 SIR MARTIN MOORE-BICK: I am sorry that we have kept you
22 waiting so long, but I am afraid these things sometimes
23 happen, but at least we are able to start this
24 afternoon.
25 THE WITNESS: Thank you.

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1 SIR MARTIN MOORE-BICK: Thank you very much.
2 Yes, Mr Millett.
3 Questions from COUNSEL TO THE INQUIRY
4 MR MILLETT: Mr Chairman, thank you.
5 Mr Cash, good afternoon. Can I start by thanking
6 you very much for coming to the Inquiry and helping us
7 with our investigations, we are very grateful to you.
8 My questions are intended to be short and simple;
9 they don't always turn out that way. So if you want me
10 to repeat a question or put it in a different way, I am
11 very happy to do so.
12 Also, if you could please keep your voice up so that
13 the person sitting to your immediate right, the
14 transcriber, can get your evidence down on the
15 transcript, we would be very grateful.
16 By way of a tip, it also helps to say "Yes" or "No"
17 rather than nod or shake your head as appropriate,
18 because that doesn't go down onto the transcript.
19 A. Okay.
20 Q. Today we will finish, I think, at 4.30, subject to
21 the Chairman, but normally we will take a break in the
22 morning and in the afternoon, but if you need a further
23 break, just let us know and we can take a short break.
24 A. Thank you.
25 Q. You have made three witness statements for the Inquiry,

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1 I think, and your first one is {ART00006544}.
2 A. Yes.
3 Q. That one is dated 11 October 2018. Could you go to
4 page 74 {ART00006544/74}, please. There is a signature
5 there. Is that yours?
6 A. Yes, it is.
7 Q. I'm going to call that your first witness statement.
8 You have a second witness statement, {ART00007399},
9 there is a signature on page 25 {ART00007399/25}. Is
10 that your signature?
11 A. Yes, it is.
12 Q. Thank you. That's dated 13 September 2019, and I'll
13 call that your second witness statement.
14 You also made a third statement. {ART00009416/20},
15 there is a signature. Is that your signature?
16 A. Yes, it is.
17 Q. That's above the date of 10 March. I will call that
18 your third witness statement.
19 Have you read each recently?
20 A. Yes, I have.
21 Q. Can you confirm that their contents are true?
22 A. Yes, I can.
23 Q. Thank you.
24 Have you discussed your statements or the evidence
25 that you are going to give today and tomorrow with

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1 anybody before coming here to give evidence?
 2 A. No, I haven't.
 3 Q. I will begin with your background and work history.
 4 You are a quantity surveyor by training, I believe.
 5 A. That's correct, yes.
 6 Q. I think you have more than 40 years' experience in
 7 project and cost management.
 8 A. Correct.
 9 Q. Is it right that you are a fellow of the RICS?
 10 A. Correct.
 11 Q. And I think past chair of its construction faculty.
 12 A. Correct.
 13 Q. I think you are also a past member of its building
 14 engineering services business group; is that right?
 15 A. Correct.
 16 Q. Before the Grenfell Tower project, had you ever before
 17 been involved in projects involving a refurbishment of
 18 a high-rise residential building?
 19 A. Not -- I cannot specifically remember, although in my
 20 career I have worked on many, many projects, some of
 21 which I can recollect easily and others not quite so
 22 easily.
 23 Q. Can you recollect any of them which involved
 24 refurbishment of a high-rise residential building, do
 25 you think?

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1 A. Not particularly, no.
 2 Q. Right.
 3 Now, in very general terms, I think your role at
 4 Artelia during the Grenfell Tower refurbishment was as
 5 project director.
 6 A. For that project, yes.
 7 Q. Yes, for that project?
 8 A. Correct.
 9 Q. Yes. What was your role in general at Artelia outside
 10 the Grenfell Tower project?
 11 A. I was a director of cost management.
 12 Q. I see.
 13 Artelia's involvement spanned the years really from
 14 March 2012 through to the end of the project.
 15 A. Correct.
 16 Q. From 2012, was your involvement throughout that entire
 17 period or were you involved for a shorter period?
 18 A. I was involved throughout that period, with the
 19 exception of a small portion of the time when I was
 20 absent for an operation.
 21 Q. Yes. In general, project director, is that the
 22 senior-most role within Artelia on a particular project?
 23 A. Correct.
 24 Q. In general, is it right that, to be a project director
 25 on a particular project, you would have to occupy

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1 a pretty senior role within Artelia overall?
 2 A. Generally, yes.
 3 Q. Can you just briefly explain to us what your role as
 4 project director on the Grenfell Tower project involved?
 5 A. It was to be primarily responsible for the delivery of
 6 the service to the project that we had signed up to with
 7 the client.
 8 Q. Did you have anybody within Artelia that you would
 9 report to?
 10 A. Yes, I had a co-director, who was my senior co-director,
 11 that I reported to, and I also reported to the main
 12 board.
 13 Q. Who was that senior co-director that you reported to?
 14 A. Mr Philip Boulcott.
 15 Q. Thank you.
 16 Now, is it right that, as project director, you
 17 weren't necessarily involved in the detail of the
 18 refurbishment project?
 19 A. Correct.
 20 Q. If there is any detail that you can remember in any of
 21 my questions, please just say --
 22 A. Yes.
 23 Q. -- or add to them.
 24 Now, some of the documents that we will look at in
 25 the course of your evidence have the name Appleyards on

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1 them. It's right, I think, that Appleyards was
 2 an entity which was acquired by Artelia or the Artelia
 3 Group.
 4 A. That's right.
 5 Q. And I believe that was in March 2012, was it?
 6 A. Yes.
 7 Q. I see.
 8 Now, Appleyards was trading, I think, as Artelia UK
 9 for some time, wasn't it?
 10 A. Correct.
 11 Q. When I talk about Artelia or Appleyards, and I use the
 12 word "Artelia", I'm going to include Appleyards in that,
 13 just so we are clear.
 14 A. Understood.
 15 Q. Can I start, then, by looking at the role of Artelia,
 16 which would include Appleyards as a name, during the
 17 primary refurbishment works, and I want to look first,
 18 if we may, at Artelia's contracts which were relevant to
 19 the Grenfell Tower project.
 20 In general, we can see from the documents that
 21 Artelia proposed a contract to the TMO on the RICS
 22 standard form. Do you remember that?
 23 A. Yes, I do.
 24 Q. That was in May 2012; yes?
 25 A. Yes.

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1 Q. Can we go to {ART00006259}, please. This is an email
 2 from Mark Anderson of the TMO of 21 August 2012 to
 3 Alun Dawson. I think Alun Dawson was Artelia's
 4 employer's agent on this project until March 2013; is
 5 that right?
 6 A. Correct.
 7 Q. Alun Dawson was an Artelia or Appleyards person at the
 8 time, wasn't he?
 9 A. Yes, he was.
 10 Q. Let's look at the text of it:
 11 "Good afternoon,
 12 "I confirm that KCTMO wishes to appoint Appleyards
 13 Limited as outlined in the proposal dated 2 May 2012
 14 under standard RICS terms of engagement."
 15 Was that the acceptance by the TMO of the May 2012
 16 proposal?
 17 A. Yes, it was.
 18 Q. It looks from other documents that there were
 19 formalities of signing this contract which were
 20 overlooked at that time. Is that right?
 21 A. Yes.
 22 Q. Do you know why that is?
 23 A. No, I don't.
 24 Q. But in any event, regardless of the formalities, is it
 25 your understanding that Artelia was contracted on the

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1 Grenfell Tower project from, at the latest, August 2012?
 2 A. Yes. I believe so, yeah.
 3 Q. Yes.
 4 A. In terms of the acceptance by the TMO, yes.
 5 Q. Now, do you remember that, in July 2014, there was
 6 a formal contract that was signed?
 7 A. Yes.
 8 Q. If we can go to that, that's at {ART00005742}, please.
 9 We will look at the first page. This is a formal
 10 letter, which is sent by Liza De Jesus on behalf of
 11 Jenny Jackson at assets and regenerations for Kensington
 12 and Chelsea TMO, to you on 9 July 2014:
 13 "Dear Mr Cash
 14 "Grenfell Tower - Enhancements.
 15 "Please find enclosed the contract as signed by
 16 Kensington and Chelsea TMO. Apologies for the delay."
 17 We can see on page 2 {ART00005742/2}, if we can just
 18 go to that, that the contract is on the RICS standard
 19 form of consultant's appointment.
 20 Do you recognise this document, as having received
 21 it, as the 2014 contract?
 22 A. Yes, I do.
 23 Q. It's right, isn't it, that in the RICS standard form,
 24 the word "consultant" means Artelia and "client" means
 25 TMO?

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1 A. Correct.
 2 Q. Just for clarity's sake, if you want to see that, that's
 3 page 6 {ART00005742/6}, if we can just flash that up so
 4 everyone can see it. There it is.
 5 Now, just for, again, a little bit more detail, is
 6 it right that Artelia, for the Grenfell Tower project,
 7 had a number of subcontractors, including
 8 ADS Associates?
 9 A. He was -- I wouldn't say he was a subcontractor. He was
 10 a freelance quantity surveyor who worked for the
 11 business occasionally.
 12 Q. I see. And working on Grenfell to provide quantity
 13 surveying services for the M&E elements?
 14 A. He had some input, but not specifically dealing with
 15 that solely.
 16 Q. I see. What other elements did ADS Associates --
 17 A. Sorry, he didn't deal with any other elements. He was
 18 brought in only to deal with a couple of specific
 19 elements of the M&E, otherwise it was all dealt with by
 20 in-house employees.
 21 Q. Just for dates, can you remember the dates when
 22 ADS Associates were brought in?
 23 A. Not specifically, no, but I remember they were both
 24 pre-contract -- both pre-construction contract.
 25 Q. Right. We have him as October 2013. Would that be

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1 about right?
 2 A. It sounds about right, yes.
 3 Q. Right.
 4 There is also Re Solutions, and is it right that
 5 that was Neil Reed, who left Artelia in July 2015 but
 6 came back into the project through his own service
 7 company?
 8 A. Correct, yes.
 9 Q. I think he continued to work on the Grenfell Tower
 10 project throughout, but in those latter months as
 11 Re Solutions.
 12 A. Correct, yes.
 13 Q. I see.
 14 Can we next turn to the role of Artelia set out in
 15 the RICS form. If we can go, please, in this document
 16 to page 10 {ART00005742/10}, first of all, I want to
 17 show you the part dealing with lead consultant.
 18 This is, as I say, page 10 of the RICS form sent to
 19 you on 9 July 2014, and here, at clause 3, we can see
 20 "Consultant's Obligations", and underneath that,
 21 "Performance of the Services". Then at 3.4, about
 22 a quarter of the way down the page, it says:
 23 "If the Consultant is designated as Lead Consultant
 24 in the Appendix, the Consultant co-ordinates the
 25 activities of the Professional Team and gives

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1 instructions to the Professional Team as necessary. As
 2 Lead Consultant, the Consultant schedules the activities
 3 so as to comply with the Programme and informs the
 4 Client of any failure by any member of the Professional
 5 Team to comply with the programme.”
 6 Now, I've read that out in full because I have some
 7 questions about it.
 8 Can we next go to page 34 {ART00005742/34}. Do you
 9 recognise this as the appendix to the contract?
 10 A. Yes, I do.
 11 Q. At the bottom half of the page, you can see there are
 12 clauses 3.4 and 3.5, and they refer back to the terms
 13 we've just been looking at under the heading "Lead
 14 Consultant", do you see that?
 15 A. Yes, I do.
 16 Q. It says, "The Consultant is not the Lead Consultant".
 17 So that means, doesn't it, that Artelia was not the lead
 18 consultant?
 19 A. Correct.
 20 Q. We can see the box has been crossed, do you see that?
 21 A. Yes, I do.
 22 Q. So that's an option to say that Artelia was not taking
 23 on the role of lead consultant; am I right about that?
 24 A. Correct.
 25 Q. Right.

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1 Then we go on. I'm sorry to take this at piecemeal
 2 pace, but it's important. Below that, the lead
 3 consultant is Bruce Sounes of Studio E, and "The
 4 Consultant is the Lead Consultant" underneath that, and
 5 that box isn't ticked. So that tells us that
 6 Bruce Sounes of Studio E was the lead consultant.
 7 In that role, was the lead consultant to undertake
 8 a scheduling or programme role?
 9 A. I don't know what the Studio E scope of service was,
 10 but -- other than they were identified within this
 11 particular appointment as lead consultant.
 12 Q. I see.
 13 Well, in general terms what did you understand the
 14 role of lead consultant to involve or include?
 15 A. Effectively leading the design team and making sure that
 16 they delivered what they were required to under the --
 17 their scopes of services, in accordance with the
 18 programme that was developed by the team.
 19 Q. Right.
 20 Was it not your job as consultant, Artelia, to at
 21 least understand what the scope of services to be
 22 provided by the lead consultant was to be?
 23 A. No, we were not involved in the appointment of the
 24 consultants. That was something that was specifically
 25 not ticked within our scope of service.

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1 Q. Well, let's look on. If you go to page 8
 2 {ART00005742/8}, I should just show you the definitions
 3 here because some of the questions I'm going to ask you
 4 may depend on them, so I'll just show you this first.
 5 At page 8 we can see the definition of "Professional
 6 Team", and the professional team there means the
 7 consultant, which is Artelia, the professionals listed
 8 in the appendix and any other professionals engaged by
 9 the client in relation to the project and which the
 10 client notifies to the consultant. Just have that
 11 definition in mind.
 12 At the time of signing this document, July 2014,
 13 what was your understanding of who it was who was to be
 14 in charge of the professional team as defined?
 15 A. In charge? I'm not sure. In terms of lead consultant,
 16 Studio E were identified as lead consultant.
 17 Q. Yes. They were. All right. Well, let me come back to
 18 that question, given that answer, a little bit later.
 19 Now, we know that Artelia was contracted directly to
 20 the TMO, as we've seen. Did Artelia at any stage answer
 21 to Studio E or otherwise to anybody who was in charge of
 22 the professional team, or was Artelia independent of the
 23 professional team and acted solely as TMO's consultant?
 24 A. We acted independently solely as TMO's consultant.
 25 Q. Right.

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1 I next want to turn, following this questioning line
 2 generally, through to the next point, which is design
 3 responsibility.
 4 Could we look at page 11 {ART00005742/11}. On
 5 page 11 we can see, at the bottom half of the page,
 6 clause 4.4, "Design Responsibility", and this is under
 7 the bigger heading just a little further up, "Health &
 8 Safety, Statutory Requirements and Prohibited
 9 Materials". If you look at 4.4, under "Design
 10 responsibility", it says:
 11 "The Consultant is only responsible for the design
 12 of the Project or any part of it and/or for specifying
 13 or approving materials for the Project or any part of it
 14 if and to the extent that it is designated as having
 15 such responsibility in the Appendix."
 16 So that's the starting point for 4.4, "Design
 17 Responsibility".
 18 If we can go next to page 35 {ART00005742/35}, we
 19 come into the appendix, and we can see at the top of
 20 that page, under or by reference to 4.4, "Design
 21 Responsibility", it says:
 22 "The Consultant is not responsible for the design of
 23 the Project."
 24 And that project is marked or crossed through. Do
 25 you see that?

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1 A. Yes, I do.
 2 Q. And the contrary terms, you can see that below, "The
 3 Consultant is responsible for the design", et cetera,
 4 are crossed through, and you can see that that is so in
 5 relation to that part and also the part immediately
 6 below it about specifying and approving materials. Yes?
 7 A. Correct.
 8 Q. So is it for that reason that you say that, because of
 9 that, Artelia wasn't responsible for the design or the
 10 materials on this project?
 11 A. Correct.
 12 Q. Right.
 13 Who did you understand to have responsibility for
 14 the design and for the selection of materials on the
 15 Grenfell Tower project?
 16 A. Studio E, Max Fordham and Curtins.
 17 Q. And who do you recall or did you think at the time was
 18 responsible for co-ordinating the design team?
 19 A. Studio E, as lead consultant.
 20 Q. And what about co-ordinating M&E and structural design?
 21 A. Studio E, as lead consultant, would also be
 22 co-ordinating them as well in the overall aspect of the
 23 design.
 24 Q. And who did you understand had responsibility for
 25 design?

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1 A. Studio E overall.
 2 Q. And same question in respect of specifying or approving
 3 materials, was that Studio E?
 4 A. Yes.
 5 Q. Right.
 6 A. As well as Curtins and Max Fordham as well.
 7 Q. I see.
 8 Now, let's look on to further services that Artelia
 9 did agree to provide.
 10 If we can go back, please, in the same document to
 11 page 23 {ART00005742/23}, we can see in the middle of
 12 the page -- this is under schedule 1 -- "Services":
 13 "The Basic Services to be performed by the
 14 Consultant [that's Artelia] are those indicated in the
 15 attached schedule(s), as identified below."
 16 There is a whole set of services which are deleted
 17 under "RICS building surveyor services", and then we
 18 have "RICS CDM co-ordinator services", that's ticked.
 19 A. Yes.
 20 Q. Or rather crossed. And then "RICS employer's agent
 21 services", again, there is a cross in that box. "RICS
 22 project manager services" are deleted, "RICS project
 23 monitor services" are deleted, but "RICS quantity
 24 surveyor services" are crossed.
 25 A. Correct.

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1 Q. So we see that there are therefore three services that
 2 Artelia, as the consultant, were taking on: CDM
 3 co-ordinator, employer's agent and quantity surveyor,
 4 but two that they weren't taking on: project manager and
 5 project monitor. Do I have that right?
 6 A. Correct.
 7 Q. Let's talk first about the CDM co-ordinator role that we
 8 can see from that document Artelia assumed.
 9 Now, CDM, just to delve into that a little bit,
 10 stands for Construction (Design and Management)
 11 Regulations, doesn't it?
 12 A. Correct.
 13 Q. And the applicable regulations for most of the
 14 Grenfell Tower project were those set out in the 2007
 15 regulations, weren't they?
 16 A. Yes.
 17 Q. And they then changed in 2015, and we'll come to that in
 18 detail later on in your evidence, but that's correct,
 19 isn't it?
 20 A. Correct.
 21 Q. Is it right that the project was required under those
 22 regulations to have a CDM co-ordinator, or CDMC as we
 23 call it?
 24 A. Yes.
 25 Q. I want to look at the role of the CDM co-ordinator under

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1 those regulations.
 2 The first question is: who was appointed initially
 3 to be CDM co-ordinator for the Grenfell Tower
 4 refurbishment?
 5 A. It was an individual, it was Keith Bushell.
 6 Q. Yes, and then I think later it was -- is this right? --
 7 Colin James and Paul Barrows?
 8 A. Paul Burrows, correct.
 9 Q. Burrows, quite right, from March/April 2015 through to
 10 October of that year.
 11 A. Yes.
 12 Q. In general terms, what was your understanding at the
 13 time of what a CDM co-ordinator did?
 14 A. His role was to specifically look at the design with
 15 respect -- look at the design risks in terms of making
 16 sure that the work could be carried out safely on site,
 17 in terms of both those operatives on site and the
 18 public, and that the final works could be also
 19 maintained safely in terms of carrying out any
 20 maintenance works or anything that might be of risk to
 21 the public, and identifying that with the design team in
 22 design risk assessments, health and safety design risk
 23 assessments.
 24 Q. Were you familiar with the Approved Code of Practice, or
 25 ACOP, for the 2007 regulations?

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1 A. I was aware of the ACOP, but I wasn't familiar with what
 2 they contained, no.
 3 Q. Did you know that they were also known as L144?
 4 A. No.
 5 Q. Right.
 6 Let's have a look at it. It's {INQ00013936},
 7 please. There it is. Just looking at it, you say you
 8 were aware of it, but not familiar with it.
 9 Had you ever seen it before the Grenfell Tower
 10 project and your involvement in it?
 11 A. I can't remember.
 12 Q. All right. Well, let's see how we go with it.
 13 Page 25 {INQ00013936/25}, please, and I would like
 14 to look with you at paragraph 90. At the top of the
 15 page, it's, "What CDM co-ordinators should do". It
 16 says:
 17 "CDM co-ordinators must:
 18 "(a) give suitable and sufficient advice and
 19 assistance to clients in order to help them to comply
 20 with their duties, in particular:
 21 "(i) the duty to appoint competent designers and
 22 contractors; and
 23 "(ii) the duty to ensure that adequate arrangements
 24 are in place for managing the project."
 25 Were you aware at the time that those duties applied

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1 to Artelia?
 2 A. I was aware of those duties. In terms of applying to
 3 Artelia, with respect to the designers, the designers
 4 were already -- had already been brought on board prior
 5 to Artelia's involvement in the project, but it wouldn't
 6 necessarily have stopped Keith Bushell from making sure
 7 that the client, the TMO, were aware of their
 8 obligations under the CDM Regulations.
 9 Q. I see. So you're saying that Studio E had already
 10 arrived on to the Grenfell Tower project before Artelia
 11 were involved in that project?
 12 A. Correct.
 13 Q. But that nonetheless those obligations still maintained
 14 as applicable?
 15 A. Yes.
 16 Q. Yes.
 17 Now, if we go to what the contract says about CDMC,
 18 that's page 61 of the contract, {ART00005742/61}. Here
 19 is a part of that which deals with the services relating
 20 to the CDM Regulations 2007, and I just want to just
 21 pick up the part in bold italics at the top for context,
 22 really:
 23 "The services which are summarised below are derived
 24 from the duties laid on the CDM Co-ordinator by the
 25 Regulations and other related requirements of the

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1 Regulations. Those listed are mandatory for the CDM
 2 Co-ordinator. Reference should be made to the
 3 Regulations for the precise scope of each service and
 4 this schedule must be read within the context of the
 5 Regulations as a whole."
 6 Then we see under item 3:
 7 "Advise and assist the Client in appointment of
 8 competent Designers and Contractors."
 9 Did you understand at the time that Artelia had that
 10 obligation to the TMO?
 11 A. Yes, I did.
 12 Q. Did Artelia provide advice on the appointment of
 13 competent designers on the project?
 14 A. I'm not sure as to whether they did or not, but, as
 15 I say, the designers were already on board prior to our
 16 appointment.
 17 Q. They may have been, but at any time after Artelia's
 18 appointment into the project, did you ever give advice
 19 as to whether or not Studio E were competent?
 20 A. Not me particularly, and I'm not sure what Keith Bushell
 21 advised the client when he came on board to the project
 22 either.
 23 Q. If we look at the word "competent" there, what was your
 24 understanding of the word "competent"?
 25 A. That the designers were competent in their profession.

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1 Q. How would Artelia normally go about assessing the
 2 competence of designers for the purposes of discharging
 3 their obligations under the CDM Regulations and, indeed,
 4 under this part of the contract?
 5 A. Specifically I'm not sure because I'm not a CDM
 6 co-ordinator. That would be something I would expect
 7 Keith Bushell to deal with.
 8 Q. But as a project director, you must have had some
 9 understanding of how it was that Artelia would go about
 10 discharging those obligations. I'm interested in what
 11 it was.
 12 A. My expectation would be that it would look at the types
 13 of projects that they had been involved with, whether
 14 there had been any particular health and safety issues
 15 in relation to the work that they had done, whether
 16 there were any outstanding claims for negligence against
 17 them, and what their track record was in terms of
 18 performance and producing designs in relation to
 19 programme and level of detail that they would produce,
 20 any feedback from other sources as well, and their
 21 general health and safety record.
 22 Q. Right. I see.
 23 So if it turned out that Studio E had never done
 24 an overclad of a high-rise residential building before,
 25 would you still say that they were competent, given the

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1 definition you have just given us?

2 A. Yes, because that wouldn't necessarily impact on their

3 competency as designers.

4 Q. Would it not?

5 A. No.

6 Q. If they had never had any experience in designing an

7 overclad of a high-rise residential building, if they

8 had never done it before, why would that not impact on

9 their competence, can you help?

10 A. Because the project itself was not just overcladding, it

11 was refurbishment and bringing up to standards, there

12 were M&E enhancements that were being made, there were

13 structural alterations being made at the bottom, there

14 were landscaping changes. So the overcladding was just

15 one part of the project and, therefore, just saying

16 that -- because they'd not done an overcladding project

17 wouldn't necessarily impact to say that they were

18 incompetent.

19 Q. I see. So you would look at the question of competence

20 in the round; is that right?

21 A. Correct, yes.

22 Q. And are you saying that even though, in fact, the

23 particular architect -- it needn't be Studio E, it could

24 be any architect for the purposes of your understanding

25 of the definition of "competent" -- might not have had

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1 particular experience at all of one element of the

2 project, that might be outweighed by experience of

3 others; is that what you are saying?

4 A. Yes.

5 Q. I see.

6 As a matter of fact, did that analysis that I have

7 just articulated to you ever get done by Artelia in

8 respect of Studio E?

9 A. I don't know.

10 Q. Right.

11 Can we go to page 63 {ART00005742/63} of the

12 contract. This is still in the CDMC schedule of

13 services, and at the top half of the page, under

14 "Generally" -- there is not much left in the rest of the

15 page, admittedly -- it says, second bullet point:

16 "Work with the project team with a proactive

17 approach to ensure that the schemes are designed and

18 delivered incorporating all relevant requirements to

19 achieve statutory compliance."

20 What did you understand that to mean, do you think?

21 (Pause)

22 A. That basically, as the CDM co-ordinator, they should be

23 proactive in working with the design teams to ensure

24 that their designs complied with whatever requirements

25 were necessary, with particular relation to the

230

1 CDM Regulations.

2 Q. Statutory compliance means what it says. Did you

3 understand that at the time as a matter of fact to have

4 included the Building Regulations?

5 A. Yes, because as part of their -- it would have been

6 ensuring that -- there would have been a sign-off or

7 a review of Building Regulations, but not necessarily

8 looking at it in detail.

9 Q. In general terms, and I'm not talking about specifics at

10 the moment, what steps did Artelia take to satisfy

11 itself that the Grenfell Tower scheme was compliant with

12 all applicable statutory obligations, including the

13 Building Regulations?

14 A. It wasn't part of our role to ensure compliance overall

15 in terms of detail because we weren't responsible for

16 design. It was ensuring that the design team were

17 actually making sure that they were doing those things,

18 rather than actually looking at the detail of it.

19 Q. I follow that. So you're accepting that your job wasn't

20 to ensure compliance, but it was to ensure that the

21 design team were making sure that they complied?

22 A. Correct.

23 Q. What would that supervisory or insurance role, as you

24 expressed it, involve?

25 A. Well, at design team meetings we would review progress

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1 and we would review what actions had been taking place

2 in between the meetings --

3 Q. Right.

4 A. -- and what actions were still to be carried out to

5 achieve a design that could be then submitted either for

6 planning or that could be used for preparation of tender

7 documents, et cetera.

8 Q. At design team meetings, would you review not only

9 progress and actions, but also do something to ensure

10 that the designs themselves were compliant with the

11 Building Regulations?

12 A. We wouldn't look at the detail of the compliance, we

13 would ask the questions as to whether -- what progress

14 had been made.

15 Q. So your questions were limited, actually, to progress

16 and to carrying out of actions which had been promised

17 to be carried out at the last meeting?

18 A. Correct.

19 Q. I see. Well, we may come back to that in due course.

20 Can we just stick with this, then. I just want to

21 look at the use of the term "designer" in the

22 CDM Regulations next.

23 Can we please go to page 34 {ART00005742/34} in the

24 contract, that's back to page 34, and on that page, we

25 see at the bottom of the page clause 4.2,

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1 "CDM Regulations", and we can see that there is
 2 a deletion of the part that says, "The Consultant is not
 3 a 'designer' for the purposes of the CDM Regulations",
 4 and the part that says, "The Consultant is a 'designer'
 5 for the purposes of the CDM Regulations" is, as it were,
 6 ticked. Do you see that?
 7 A. Yes, I do.
 8 Q. Now, we saw earlier, because I showed it to you, on
 9 page 35 {ART00005742/35}, the next page, that Artelia
 10 was not contractually responsible for the design of the
 11 project. Do you want to see that again? It's page 35.
 12 It's probably just convenient to do that. Do you see
 13 that?
 14 A. Yes, I do.
 15 Q. Just flipping back then to the page before, we can see
 16 here that even though Artelia was not contractually
 17 responsible for the design of the project, the
 18 consultant, Artelia, is a designer for the purposes of
 19 the CDM. Do you see the point I'm putting to you --
 20 A. Yes, I do.
 21 Q. -- thus far?
 22 A. Yes.
 23 Q. Now, you have addressed this in paragraph 38(d) of your
 24 third witness statement. Can we just have that up,
 25 please. It's page 17 {ART00009416/17}, and on page 17

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1 you can see there that, at paragraph 38(d) at the bottom
 2 of the page, you say that:
 3 "My understanding is that as a technical matter,
 4 because AUK [Artelia UK] was involved in preparing a
 5 Contract Sum Analysis and collating the Employer's
 6 Requirements, which are documents that refer to the
 7 designs produced by others on the Project, AUK needed to
 8 be identified as a 'designer' for the purposes of the
 9 CDM Regulations in its Appointment. AUK did not,
 10 however, produce any designs itself on the Project and,
 11 as I say above, had no responsibility for the design of
 12 the Project. Indeed, this is something which
 13 Ms Williams appeared to accept in her email of 20 July
 14 2015, (see paragraph 15 above) in which she stated that
 15 'Artelia are an unlikely designer !'. In my view,
 16 Ms Williams understood at the time that AUK had no
 17 design responsibility under its Appointment."
 18 Now, we will come back in due course to what
 19 happened in the summer of 2015 on this question, but can
 20 I just ask you: where you say Artelia didn't do any
 21 design work itself on the project, can you explain why
 22 Artelia should be a designer for CDM purposes?
 23 A. Because at the time I understood that, because we were
 24 producing documents that had cross-references to
 25 technical documents with specifications in, we would

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1 have to be identified as a designer. I know that there
 2 are different views in that respect, and since then I'm
 3 aware that actually we should not have been identified
 4 as a designer for the CDM Regulations.
 5 Q. I see. So, at the time, did you understand that there
 6 was a difference between a designer for the
 7 CDM Regulations and a consultant who was responsible for
 8 the design of the project?
 9 A. The CDM Regulations have a definition of what they call
 10 a designer, which is not in particular relation to
 11 designing a full design for a building, an architectural
 12 design or an engineering design.
 13 Q. Right, I follow.
 14 So, in summary, was it that you thought that you
 15 were a designer -- not you personally, but Artelia was
 16 a designer within the definition of the CDM Regulations,
 17 but, as consultant, not actually responsible for design?
 18 A. Correct.
 19 MR MILLETT: I see.
 20 Mr Chairman, it's 4.30. I'm going to turn to
 21 a subtopic. It's probably as convenient a moment as
 22 any.
 23 SIR MARTIN MOORE-BICK: Yes, thank you.
 24 Mr Cash, I'm sorry, you're just getting into your
 25 stride, but we do finish the day at 4.30. I think for

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1 most of us it's long enough. So we're going to break at
 2 that point. We will come back and resume, please, at
 3 10 o'clock tomorrow.
 4 THE WITNESS: I will, thank you.
 5 SIR MARTIN MOORE-BICK: May I ask you, please, not to talk
 6 to anyone about your evidence or anything relating to it
 7 overnight.
 8 THE WITNESS: Yes, I will make sure I don't.
 9 SIR MARTIN MOORE-BICK: Good, thank you very much.
 10 Would you like to go with the usher, then, please.
 11 THE WITNESS: Thank you.
 12 (Pause)
 13 SIR MARTIN MOORE-BICK: Right, Mr Millett, that's it for the
 14 day, and we will resume at 10 o'clock tomorrow.
 15 MR MILLETT: Thank you, Mr Chairman.
 16 SIR MARTIN MOORE-BICK: Thank you.
 17 (4.30 pm)
 18 (The hearing adjourned until 10 am
 19 on Tuesday, 6 October 2020)
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