

# OPUS 2

## INTERNATIONAL

Grenfell Tower Inquiry

Day 17

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1 Wednesday, 8 July 2020  
 2 (10.10 am)  
 3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to  
 4 today's hearing. We are going to continue taking  
 5 evidence from Mr Ashton of Exova in just a moment.  
 6 Would you like to ask Mr Ashton to come in, please.  
 7 MR TERRENCE ASHTON (continued)  
 8 SIR MARTIN MOORE-BICK: Good morning, Mr Ashton.  
 9 THE WITNESS: Good morning, sir.  
 10 SIR MARTIN MOORE-BICK: Sit down and make yourself  
 11 comfortable.  
 12 I'm sorry that you have been kept waiting longer  
 13 than usual, and indeed those watching through the live  
 14 stream may be wondering why we're running late. The  
 15 answer is we had a small technical hitch, but we are now  
 16 ready to start, and so I will invite Ms Grange to carry  
 17 on.  
 18 Questions from COUNSEL TO THE INQUIRY (continued)  
 19 MS GRANGE: Yes, thank you.  
 20 Yes, Mr Ashton, when we broke yesterday we were just  
 21 looking at some of the contents of the design note that  
 22 you prepared on 12 September 2012, and I just want to  
 23 pick up back with that.  
 24 So if we can bring that up, {TMO10001562/3}. If we  
 25 could zoom in in the middle of the page at 3.2, this is

1

1 where you are dealing with B5, access and facilities for  
 2 the fire service. Do you see that?  
 3 A. I do, yes.  
 4 Q. We can see there that you have talked about "necessary  
 5 to re-site the existing inlet to the dry rising main";  
 6 is that correct?  
 7 A. Correct.  
 8 Q. Can you explain why that's the only item you have  
 9 referred to in relation to the B5 requirement, access  
 10 and facilities for the fire service, given that there  
 11 would have been a whole lot of other issues that would  
 12 need addressing in a fire strategy in relation to B5?  
 13 A. I think that that was the item that needed immediate  
 14 attention before they did any further alterations to the  
 15 site, because notwithstanding the construction process,  
 16 the fire service would still need to fight a fire  
 17 anywhere in the building, and the location of the inlet  
 18 to the dry main was in the wrong position.  
 19 Q. I see. So that was the most pressing issue you could  
 20 see --  
 21 A. Indeed.  
 22 Q. -- under B5?  
 23 A. Absolutely.  
 24 Q. Okay.  
 25 Then if we can look at section 6 of the note, at the

2

1 bottom of that page, you have set out some references  
 2 there that you have referred to. In item 1, you have  
 3 dealt with a British Standard, fire detection and alarm  
 4 systems for buildings. You have given a 1995 revision  
 5 of that British Standard, but the version of Approved  
 6 Document B current at this time had a 2004 updated  
 7 standard for BS 5839-6:2004.  
 8 A. Right.  
 9 Q. Can you explain why there is an out-of-date version  
 10 there?  
 11 A. Well, it was probably an error on our part. I mean,  
 12 I think that the problem with the British Standards  
 13 Institution is they keep revising their standards. It's  
 14 an ongoing process --  
 15 Q. Yes.  
 16 A. -- and it's difficult to keep up with the new issues as  
 17 they come out. We try and do it as and when we can.  
 18 Clearly when we're using or quoting British Standards as  
 19 part of a fire strategy, it would be the particular  
 20 standard that was relevant at the time the statutory --  
 21 sorry, the strategy was drawn up.  
 22 Q. Yes.  
 23 A. Now, if this one was out of date at the time that we  
 24 wrote that design note, then that was an error which we  
 25 should have corrected.

3

1 Q. Finally, just on the content of the design note -- we're  
 2 going to come back in a moment and look to some more  
 3 emails about what the design note was trying to  
 4 achieve -- I want to look again at the email sent by  
 5 Cate Cooney to you on 10 September. This is at  
 6 {EX000000388}. So this is two days before your  
 7 design note.  
 8 A. Right.  
 9 Q. We looked at this email yesterday, and I want to focus  
 10 on the last two paragraphs, if we can zoom in on those.  
 11 A. Yeah.  
 12 Q. So she says there:  
 13 "The existing ventilation system is questionable and  
 14 the overall scheme theoretically makes the existing  
 15 conditions worse by adding the additional risk of 2 No  
 16 extra residential floors to the building. It is  
 17 proposed to upgrade the ventilation system, but the  
 18 standard it will achieve is unknown. There are also no  
 19 details on the terminal to the shaft.  
 20 "Generally, there is a significant approvals risk  
 21 with the current proposals, particularly at walkway  
 22 level."  
 23 And then she says:  
 24 "Hope the above is of some use."  
 25 What we would like to understand is: can you explain

4

1 why you didn't go into the detail that Ms Cooney does  
 2 there in your design note?  
 3 A. Well, I think the design note was only a precursor to  
 4 further work that was going to be carried out on the  
 5 building, in terms of developing a fire strategy for it.  
 6 I mean, I agree with her sentiments in there that there  
 7 were significant approvals risks, because what she  
 8 looked at wasn't satisfactory.  
 9 Q. Yes.  
 10 A. And I think I should also emphasise that the smoke  
 11 ventilation system was not acceptable, and that needed  
 12 to be sorted out as a fundamental part of the  
 13 fire strategy.  
 14 Q. Yes. I mean, in fairness to you, you have said in the  
 15 note that the smoke ventilation system needs to be  
 16 refurbished and modified to reflect current statutory  
 17 requirements.  
 18 A. Yes.  
 19 Q. But my point really is: why weren't you as direct as she  
 20 is in that email with your clients about the approvals  
 21 risk that was presented by the scheme?  
 22 A. Well, I think what I'm saying is that, as drawn at the  
 23 time that she looked at it, there was a significant  
 24 approvals risk. Our job was to make sure that that risk  
 25 was mitigated.

5

1 Q. I see.  
 2 Now, you knew that the existing system was  
 3 unsatisfactory and that the London Fire and Emergency  
 4 Planning Authority wanted it to be replaced; that's the  
 5 smoke control system. You knew that, didn't you?  
 6 A. Yeah.  
 7 Q. You say that in paragraph 4.4 of your first witness  
 8 statement. As we have just seen, Ms Cooney had also  
 9 warned you that the overall scheme theoretically makes  
 10 existing conditions worse.  
 11 Did you have any conversations with Ms Cooney about  
 12 this at the time?  
 13 A. No, I don't believe I did. I mean, I think what's in  
 14 her note to me is pretty comprehensive.  
 15 Q. Were you aware at the time of a separate email that she  
 16 had sent to Mr Martyn in August, in which she  
 17 unequivocally says there are approvals risks on the  
 18 firefighters' shafts and means of escape?  
 19 A. I'm not sure if I was. I did see it subsequently.  
 20 Q. Yes, let's bring that up. This is at {EX000001279}. If  
 21 we can just blow up the main text of that email. This  
 22 is an email that Mr Millett explored in detail with  
 23 Ms Cooney when she gave evidence, and it sounds from  
 24 your answer like you have now seen this email.  
 25 A. Yes, indeed.

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1 Q. Can you recall when you saw it?  
 2 A. I can't recall when but I know I have seen it.  
 3 Q. Do you think it was during your time on the project or  
 4 subsequently, in the context of this Inquiry?  
 5 A. I don't know, if I'm honest. I mean, it's possible that  
 6 I saw it some time shortly after that. I mean, it's  
 7 a memorable email in some senses.  
 8 Q. Yes.  
 9 A. But I think the thing is that she was having a dialogue  
 10 with Studio E in relation to her work on the existing  
 11 fire strategy, and she somehow got involved in  
 12 a discussion about the proposals for refurbishment, but  
 13 that wasn't really her job; that was my job.  
 14 Q. I see.  
 15 I mean, we can see there that she says, picking it  
 16 up in the second line:  
 17 "They are now adding additional levels which merges  
 18 uses around a single stair. Not great. Basically I  
 19 have told him we can massage the proposal to something  
 20 acceptable, with separation, lobbies etc ..."  
 21 Then later in the email she says, three lines from  
 22 the bottom of that paragraph:  
 23 "They are making an existing crap condition worse so  
 24 it's a matter of working the worse bits out and making  
 25 the new stuff work."

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1 Did you share her opinion about the proposals for  
 2 the refurbishment at this time?  
 3 A. No, I wouldn't have described it in the way that she  
 4 did. I mean, I think you need to -- or one needs to  
 5 bear in mind that, ideally, a residential building will  
 6 have residential flats and common areas, but it won't  
 7 have a mixture of uses.  
 8 Now, in this particular case, we had an existing  
 9 building built in the 1970s, consented to by, I'm  
 10 assuming, the Greater London Council, using a different  
 11 code of practice to the one that currently applies, but  
 12 there were existing non-residential uses in there. And  
 13 I think the general consensus amongst Exova was that we  
 14 needed to make sure that what -- how the scheme ended up  
 15 was acceptable to the Building Control authority and was  
 16 safe.  
 17 Q. Had you seen this email at the time, would it have  
 18 caused you any concern?  
 19 A. No. No, not particularly. In what respect?  
 20 Q. Well, would you have considered warning Mr Soules that  
 21 you were "making an existing crap condition worse"?  
 22 A. I'm not sure that I've used those words. But no --  
 23 Q. But the sentiment, would you --  
 24 A. I mean, I think we were going to be talking to Bruce  
 25 about how to improve his original scheme for the

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1 alterations , which didn't comply, in my view.  
 2 Q. What about warning the TMO, your client? Would that  
 3 have caused you to raise the issue with them?  
 4 A. I think when I had the first meeting with the TMO, which  
 5 was essentially a design team meeting which they  
 6 attended, I did make the point fairly forcefully that  
 7 the proposals as drawn up by Studio E were not  
 8 acceptable in terms of getting approval under the  
 9 Building Regulations, and that therefore we needed to do  
 10 some serious work to get to a situation where we could  
 11 actually go forward to Kensington and Chelsea with a --  
 12 confident that a scheme would be approved.  
 13 Q. Which meeting would that be? Would that be the one on  
 14 6 September that you attended?  
 15 A. I couldn't give you the date, but it was the very first  
 16 design team meeting that had the full design team there,  
 17 including TMO and the rest of them.  
 18 Q. Okay.  
 19 A. It was my first meeting, if you like .  
 20 Q. Just on this design note, did you consider the  
 21 design note to contain sufficient information to enable  
 22 the design team to progress the design for RIBA stage C?  
 23 A. No, it was essentially , as I said yesterday, it was  
 24 a list of points that they needed to address as a matter  
 25 of some urgency before we then progressed the design.

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1 Q. So does it follow that this design note was not what you  
 2 envisaged you would produce for this stage when you  
 3 drafted the original proposal document and you talked  
 4 about a preliminary fire strategy?  
 5 A. No, as I think I said yesterday, giving my evidence,  
 6 this design note could have taken a different form. It  
 7 could have been an email with bullet points.  
 8 Q. Yes.  
 9 A. That would have reduced its status to just a normal  
 10 communication. It wasn't intended to be a definitive  
 11 document to go forward for discussion with the  
 12 local authority.  
 13 Q. Okay.  
 14 Can we look at some contemporaneous emails around  
 15 this time, which give some background to the run-up to  
 16 this design note. Can we turn to {EXO00000668}. This  
 17 is an email sent to you on 8 August 2012 --  
 18 A. Right.  
 19 Q. -- by Ms Barker, and she says:  
 20 "Hi Terry  
 21 "I hope you are well and recovered from your  
 22 illness ."  
 23 Then she explains that she went to a meeting in your  
 24 absence, and she continues:  
 25 "The email below from Bruce has irritated me a

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1 little , to say the least . I have asked Cate to do the  
 2 fire strategy for the existing tower building, and so  
 3 far this is the only part of the project that we have  
 4 had the fees accepted on. If Bruce wants us to do the  
 5 next stage then we need to have the fees accepted - this  
 6 has not happened yet."  
 7 Then she goes on and explains that she's got  
 8 concerns because various people are away at that time.  
 9 Now, can we just read the email below that she's  
 10 referring to, Bruce Soune's email {EXO00000668/2}. If  
 11 we can zoom in on that.  
 12 So this is Bruce Soune's to her on 7 August, and it  
 13 copies you in. Do you see that at the top?  
 14 A. Yeah, I do.  
 15 Q. So you saw this at this time. He says:  
 16 "Apologies for not responding sooner. I have been  
 17 distracted but I couldn't understand where you got the  
 18 16 August deadline. This is the Planning deadline. Any  
 19 impact the fire strategy has on the overall scheme needs  
 20 to be understood sooner than this. Ideal we should be  
 21 submitting a Stage C type document to the client for the  
 22 end of this week, or next week. It would be enough to  
 23 know that you have reviewed the scheme and have no  
 24 significant comments/reservations to make, and the  
 25 strategy for fire safety is achievable and any

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1 implications on the layout and external works is  
 2 understood by the rest of the design team."  
 3 Then he explains, he says:  
 4 "This might sound unreasonable but the project has  
 5 been live for some time - notwithstanding the delay on  
 6 formal appointments. See attached markup provided by  
 7 James Lee ..."  
 8 And he had discussed it previously with him on the  
 9 phone, et cetera .  
 10 Now, do you agree that it's very clear from that  
 11 that Studio E wanted a stage C type document to submit  
 12 to the client?  
 13 A. Yes. That's reasonably clear from what he's saying.  
 14 Whether that stage C type document incorporated  
 15 an outline fire safety strategy or not, I don't know.  
 16 Q. You didn't --  
 17 A. I didn't interpret it that way, no.  
 18 Q. You didn't interpret it that way?  
 19 A. No. I think there are two issues here: one is that we  
 20 hadn't been formally appointed to do the work on the  
 21 refurbishment, which Clare alluded to in her earlier  
 22 email, and that really is -- you know, we weren't able  
 23 to produce a stage C report dealing with fire safety  
 24 issues in the timescale.  
 25 Q. Yes. I mean, I was going to pick this up later , but

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1 maybe we come to this now: there had been an email to  
 2 you dated 18 July from Artelia saying that your  
 3 fee proposal was accepted. Maybe we could quickly look  
 4 at that, {EXO00000543}. If we can blow that up.  
 5 So on 18 July Alun Dawson emails you saying:  
 6 "I just wanted to drop you a short note, to confirm  
 7 that the Client has now confirmed your proposed fee is  
 8 approved ..."  
 9 A. Right.  
 10 Q. "... to which end we would now ask that you engage with  
 11 Bruce @ Studio E, in respect of the above project  
 12 forthwith."  
 13 Then they are currently reviewing how to formalise  
 14 appointments:  
 15 "... as it may be that we have one main appointment  
 16 with Studio E who then sub-consult to all other  
 17 parties ..."  
 18 Then:  
 19 "Can you please confirm by return you are happy to  
 20 proceed in the interim on the basis of this email as an  
 21 instruction on behalf of the Client in respect of the  
 22 same."  
 23 Do you see that?  
 24 A. Right. Yeah, I do, yes.  
 25 Q. To be fair to you, I think you were away because of

13

1 illness during this time.  
 2 A. I was away for four weeks, as I said yesterday.  
 3 Q. Does that potentially explain why Ms Barker was under  
 4 the impression in August that the fee proposal hadn't  
 5 been accepted?  
 6 A. Yes, indeed.  
 7 Q. When in fact we can see here that it was and the email  
 8 had been sent to you confirming that.  
 9 A. Right.  
 10 Q. If we could just go back to Mr Sounes' email that we  
 11 were just looking at, {EXO00000668/2}, can I just ask,  
 12 at the end of that first paragraph, what you understood  
 13 him to mean when he says -- so in the very last few  
 14 lines, he says:  
 15 "... and any implications on the layout and external  
 16 works is understood by the rest of the design team."  
 17 What did you understand him to mean by that?  
 18 A. Well, there were changes proposed to the landscaping  
 19 which would have gone on in parallel with the general  
 20 improvement to the entrance to the site, and I would  
 21 interpret external works as meaning landscaping,  
 22 including access for fire appliances to the base of the  
 23 tower.  
 24 Q. I see.  
 25 Would you have interpreted external works to include

14

1 the external works on the cladding?  
 2 A. No, I wouldn't.  
 3 Q. The design note that we were looking at that you  
 4 produced on 12 September, was that effectively  
 5 an attempt to address this request for a stage C type  
 6 document?  
 7 A. I would hesitate to describe it as a stage C type  
 8 document, since it wasn't a formal fire safety strategy,  
 9 it was a design note, which doesn't have the same status  
 10 in our terms as a report. It's a note for information  
 11 to the design team, "These are the sort of things that  
 12 you need to consider before we can start formulating  
 13 a fire strategy".  
 14 Q. I see.  
 15 A. I mean, there were issues in there which were resolved  
 16 fairly shortly afterwards, but some remained as an issue  
 17 until we had our first meeting with RBKC  
 18 Building Control. So, you know, these were early days  
 19 in our terms.  
 20 Q. But are we right that that document was the only  
 21 document that could have been responding to this  
 22 request?  
 23 A. Yes, that's fair comment.  
 24 Q. There was no other report --  
 25 A. There was no other report, no.

15

1 Q. I'm going to put this to you directly: given that  
 2 Mr Sounes had called for a stage C type document --  
 3 SIR MARTIN MOORE-BICK: With respect, Ms Grange, what  
 4 Mr Sounes is saying is that we, ie Studio E, should be  
 5 submitting a stage C type document, and he is asking  
 6 Exova to tell him whether that's broadly right.  
 7 MS GRANGE: You're absolutely right. I'll put it  
 8 a different way.  
 9 Given what Mr Sounes had asked for in this email, he  
 10 wants to know that you have reviewed the scheme, no  
 11 significant comments/reservations and the strategy is  
 12 achievable, et cetera, given that request, I'm going to  
 13 put it to you that the note that you prepared should  
 14 have covered B2, B3 and B4 as well, even if briefly.  
 15 A. At that stage -- and I think you asked me this question  
 16 yesterday -- those weren't pressing issues design-wise.  
 17 When I looked at the scheme from day one, it  
 18 occurred to me that what Studio E were proposing was not  
 19 acceptable in fire safety terms. I don't want to make  
 20 that sound dramatic, but you have to understand that you  
 21 need to go to a Building Control authority with a scheme  
 22 that you can justify --  
 23 Q. Yes.  
 24 A. -- and get them to agree to. What we saw initially  
 25 wasn't acceptable in layout terms, and there were other

16

1 imponderables, such as: will they ask for sprinklers?  
 2 Q. Wasn't the fact that you knew it was going to be  
 3 overlaid something which would be an important issue  
 4 Building Control would also have to be looking at in  
 5 detail?  
 6 A. I didn't think about cladding at that particular stage,  
 7 no. We were more focused on the layout of the floors,  
 8 of the lowest four floors of the building.  
 9 Q. Did you envisage at this stage, when you submitted the  
 10 design note, that it would be relied upon and included  
 11 in Studio E's own stage C report?  
 12 A. I would have been surprised if that's what they thought  
 13 they were going to do.  
 14 Q. Okay.  
 15 A. Because it was only a note. I think that's the  
 16 operative word. It was: these are the things that we  
 17 need to consider.  
 18 Q. Yes.  
 19 A. You can't go forward to a client with a stage C report  
 20 saying, "We think the fire safety strategy is fine",  
 21 when the note that they have got in their hands suggests  
 22 otherwise.  
 23 Q. Yes.  
 24 Can we go back to the email that we were just  
 25 looking at, just to pick up another point, and go up

17

1 a page {EX000000668/1} to the short email you sent in  
 2 response to Ms Barker.  
 3 On 8 August, you say:  
 4 "Clare  
 5 "Thank you for dealing with this in my absence. Are  
 6 you taking this project over now?  
 7 "Terry."  
 8 A. Yeah.  
 9 Q. Can I just ask you about that: does that indicate that  
 10 you were keen to hand the project over to her at this  
 11 stage?  
 12 A. Yes, that might be the case. I had just come back from  
 13 four weeks suffering from pneumonia, so I don't think  
 14 that I was feeling terribly wonderful two days after  
 15 coming back. But, no, it was a genuine question: now  
 16 you seem to be corresponding with Studio E about the  
 17 refurbishment, do you want to take the project over? It  
 18 might have made some sense in terms of continuity at  
 19 least.  
 20 Q. I think you have explained why you are keen to do that.  
 21 Briefly, before we get to the outline fire safety  
 22 strategies themselves, I just want to pick up and be  
 23 clear who Exova were working for on the project.  
 24 We looked at the email from Alun Dawson of  
 25 Appleyards on 18 July 2012 -- let's go back to that,

18

1 {EX000000543} -- and they're emailing you confirming  
 2 that the client has now confirmed your fee proposal is  
 3 approved.  
 4 Can you, just to be clear, explain who you  
 5 understood the client to be on the project?  
 6 A. I understood the client to be the TMO.  
 7 Q. Yes.  
 8 A. Appleyards I think were the quantity surveyors.  
 9 Q. Yes.  
 10 A. It's not uncommon for quantity surveyors to be --  
 11 because they're looking at all the financial aspects of  
 12 a development, it's not unusual for them to get involved  
 13 in the costs of the various consultants, and in fact  
 14 having a dialogue with them.  
 15 Q. They were also, I think it's fair to say, the project  
 16 administrators as well.  
 17 A. That's not a term that I understand. You either have --  
 18 you have a project manager generally, and you have  
 19 a client, and then you have a lead consultant. The term  
 20 you've just used is not something that I'm familiar  
 21 with.  
 22 Q. Okay.  
 23 A. To be honest, I thought Appleyards were -- their main  
 24 function was quantity surveyors.  
 25 Q. Yes, yes.

19

1 Were you clear that your day-to-day engagement on  
 2 the project was via Studio E, as said to you in this  
 3 email?  
 4 A. Yes. I mean, that would be normal for any project. We  
 5 would normally work with the lead consultant, and the  
 6 lead consultant is nearly always in 100% of the cases  
 7 the architect.  
 8 Q. Yes.  
 9 A. We don't -- the exception to that is that some actions  
 10 are required by the project manager, if you have  
 11 a project manager who is very active or proactive. In  
 12 this particular case, most of the running, if I can call  
 13 it that, was by Studio E, which is not unusual.  
 14 Q. Yes.  
 15 Then this last paragraph, he asks you to confirm  
 16 that you are happy to proceed in the interim on the  
 17 basis of this email as an instruction on behalf of the  
 18 client in respect of the same.  
 19 Did any more formal arrangements ever materialise?  
 20 A. I would hope it did, but I'm not sure. I mean, I think  
 21 there was the contract that we had an exchange of emails  
 22 with Studio E about.  
 23 The problem that everybody has in this business is,  
 24 if you haven't got a formal instruction to work, you  
 25 might end up in a situation where you've done work and

20

1 then, for some reason or other, you can't get paid for  
2 doing it, and that's not very good for your business.  
3 But we would always want to proceed on the basis of  
4 an agreed contract.

5 Now, we are happy to do a limited amount of work  
6 where we have an email of this sort, which says, "The  
7 client is happy with your fees, can you carry on until  
8 the whole thing is formalised?"

9 Q. Yes.

10 Can you confirm that there was no competitive tender  
11 process involved in Exova's appointment?

12 A. I think I must have realised that there was no  
13 competition, because we weren't asked to tender as such,  
14 we were asked to provide a fee proposal. Where we  
15 get -- where we're competing with another consultancy or  
16 two other consultancies or whatever, then we would know  
17 about that, because the form in which we're asked to  
18 tender would be somewhat different. This one was, "We  
19 would like you to do it, can you please give us  
20 a fee proposal for doing that".

21 Q. Yes. So, to your knowledge, Exova was the only firm  
22 approached by the TMO for this work?

23 A. Yes, that's correct.

24 Q. Did the TMO pay your invoices?

25 A. I believe they did.

21

1 Q. Who did you actually report to on the Grenfell project  
2 during the work?

3 A. Report to in what sense?

4 Q. In terms of reporting back on your work, who --

5 A. We didn't have a formal reporting procedure. Now, on  
6 some projects the project manager insists on a monthly  
7 progress report from all the consultants. That sort of  
8 structure didn't apply to this project.

9 Q. Okay.

10 A. So, if you like, the client or his project manager  
11 wasn't seeing what everybody was doing.

12 Q. Yes. Do you think it would have been helpful on this  
13 project to have had that kind of formal reporting  
14 structure?

15 A. I think that type of regime, if I can call it that, is  
16 highly desirable on any project of any significance.

17 Q. Yes. Okay.

18 So I now want to turn to look at the outline fire  
19 safety strategies, issues 1, 2 and 3, that you prepared.  
20 We're going to look at these in stages.

21 Issue 1 is dated 31 October 2012. If we can bring  
22 that up, that's at {EXO00000519}, and we can see it's  
23 headed there "Outline Fire Safety Strategy", and we see  
24 on the front page the date in the bottom right-hand  
25 corner, issue: 01, and so what we know is this was

22

1 prepared seven weeks after the design note of  
2 12 September that we were looking at previously.

3 A. Right.

4 Q. Which RIBA stage was this issue 1 prepared for?

5 A. I don't think we tied it to a particular RIBA stage. It  
6 was clearly an outline fire safety strategy, so  
7 logically it would have come under the heading of RIBA  
8 stage C. In other words, it wasn't fully developed, it  
9 didn't, you know, deal with every aspect of the building  
10 design.

11 Q. So even though your fee proposal had broken down the  
12 work according to the RIBA stages, which you had been  
13 asked to do, you hadn't provided this report with  
14 a particular stage in mind?

15 A. Well, I think I've just confirmed that it was  
16 effectively a stage C report.

17 Q. Okay.

18 A. In other words, it didn't have a huge amount of detail.

19 Q. Yes.

20 Now, Studio E's stage C report, their own stage C  
21 report, was also issued on this same day,  
22 31 October 2012, and Max Fordham's stage C report had  
23 come in on 10 October 2012.

24 Now, just looking at those dates, I want to put it  
25 to you: would you accept that this indicates that

23

1 Exova's work was insufficiently co-ordinated with the  
2 design work of the other parties?

3 A. Sorry, did you say insufficiently co-ordinated?

4 Q. Yes, because it's coming in too late to be absorbed into  
5 the stage C report, for example, of the architect.

6 A. I was aware that Studio E and ourselves issued a report  
7 on the same day. That was a bit of a coincidence. I'm  
8 not entirely sure whether our report needed to be in the  
9 stage C report that was prepared by Studio E.

10 Q. Well, we'll look at it in a moment. In fact, what was  
11 in the stage C report -- and I will show you this -- was  
12 the design note from September was in the stage C  
13 report.

14 A. Right. Well, that was presumably all they had at the  
15 time.

16 Q. Yes.

17 A. Yeah.

18 Q. Yes.

19 Now, we see from the second page {EXO00000519/2} of  
20 this outline fire safety strategy that it was prepared  
21 by you and it was reviewed by Mr McEleney. We will come  
22 back to think about his role later.

23 I want to look at the contents page at page 3. This  
24 is {EXO00000519/3}. You have got that there?

25 A. Yeah.

24

1 Q. That sets out the topics that were addressed in the  
 2 report. If we go on to page 4 {EX000000519/4}, this is  
 3 the introduction, and it explains in paragraph 1:  
 4 "The proposed development is the refurbishment of  
 5 Grenfell Tower, a 24 storey residential block ..."  
 6 Then it explains what else it incorporates,  
 7 including other accommodation.  
 8 Then we have a list. It says:  
 9 "The refurbishment comprises ..."  
 10 And we have a list of what the refurbishment  
 11 comprises in bullet points.  
 12 Now, nowhere in that list does it state that the  
 13 refurbishment includes overcladding, does it?  
 14 A. No, that's correct.  
 15 Q. Can you explain why you didn't include the overcladding  
 16 of the tower in that list?  
 17 A. Well, because it wasn't on my mind at the time, I guess.  
 18 I mean, had we had some sort of preliminary details of  
 19 cladding for us to consider, then we might have  
 20 incorporated it in the list. But, equally, we could  
 21 have put it in the list. But you will see if you look  
 22 at the report, there are no statements regarding the  
 23 cladding in the later part of the report.  
 24 Q. Yes. So we've established that you did know that  
 25 overcladding was going to be part of the refurbishment.

25

1 A. Yes.  
 2 Q. Can you explain why you hadn't sought further details  
 3 yourself by that time about the cladding proposals?  
 4 A. It's not something that we would do ourselves. We would  
 5 expect it to come from Studio E, or from somebody else.  
 6 Q. I see.  
 7 A. We can't guess what their proposals are for cladding.  
 8 If they send us a set of proposals, then that's another  
 9 thing, and that's the normal way it would be done.  
 10 Q. Yes.  
 11 Now, we looked at some meetings where cladding was  
 12 referred to, including aluminium rainscreen and zinc  
 13 cladding, yesterday. I'm now wanting to focus on what  
 14 had happened after your design note was prepared but  
 15 before this outline strategy was submitted.  
 16 So if we can pick this up, if we go to  
 17 {MET00065658/8}, and if we can zoom in on the top of  
 18 this, we can see this is an email from Mr Jess of  
 19 Studio E to Colin Chiles of Leadbitter, Max Fordham,  
 20 et cetera, and you are copied in, do you see, you are  
 21 cc'd to that?  
 22 A. Yes, indeed.  
 23 Q. We can see from the content of the email that Mr Jess is  
 24 inviting people to a design team workshop on  
 25 13 September at 2 pm.

26

1 Can you recall whether you attended that design team  
 2 workshop? I appreciate you are only copied in to this  
 3 email, but we just want to know if you did attend --  
 4 A. I don't believe I did attend. In fact, I'm pretty sure  
 5 I didn't attend that meeting. It was actually held  
 6 on site, from the look of this.  
 7 Q. Yeah. And you know that you didn't go to site, no.  
 8 A. No.  
 9 Q. Can we look at another email. This is {SEA00006394},  
 10 and if we can blow that up. So this is a little bit  
 11 later, in October. On 23 October 2012, Mr Jess of  
 12 Studio E emails a draft of Grenfell work packages for  
 13 the refurbishment project to a number of members of the  
 14 design team, and including you. You're on the main list  
 15 there --  
 16 A. Yeah.  
 17 Q. -- in terms of receipt of this email; do you see that?  
 18 You're the last person --  
 19 A. Indeed, yes.  
 20 Q. It appears to be for the purposes of a workshop on  
 21 25 October, Thursday the 25th. He is saying:  
 22 "The plan for Thursday is to initially have a brief  
 23 discussion ..."  
 24 Do you remember attending that design team workshop?  
 25 A. I don't remember attending it, but I might have done.

27

1 But I think the key was that during the discussions  
 2 between the issue of the design note and issue 1 of the  
 3 fire safety strategy report, we had discussions, quite  
 4 detailed discussions, with Studio E as to how they could  
 5 modify their design to a point where we felt confident  
 6 that we could actually present it to Building Control.  
 7 Q. Yes.  
 8 A. Sorry, if I might add a little bit more clarification.  
 9 Q. Yes.  
 10 A. Because it was an existing building which was being  
 11 altered, there was a slight risk in my mind that the  
 12 Building Control authority, in consultation with the  
 13 Fire Brigade, might say now is the opportunity to put  
 14 sprinklers in the non-residential parts of the building.  
 15 Q. Right.  
 16 A. That was a genuine concern on the part of the client,  
 17 that ... if you look at the statutory position, the  
 18 statutory position is that as long as the existing  
 19 arrangements are maintained in the building, you don't  
 20 have to do anything to it. Where you're doing  
 21 alterations to part of it, anything goes. The  
 22 local authority could say, "Well, we'll treat these  
 23 floors of the building as a brand new building", and  
 24 with all that that implies.  
 25 So there was a need to get to see RBKC

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1 Building Control to sound them out.  
 2 Q. Yes, I see.  
 3 I mean, I had a section that we'll come to on  
 4 sprinklers in due course, so I don't want to get into  
 5 this too much --  
 6 A. Okay.  
 7 Q. -- but you said that the TMO were concerned about that.  
 8 What was the nature of their --  
 9 A. I don't think they were specifically concerned about  
 10 sprinklers; they were concerned that we wanted --  
 11 you know, whether the proposals were going to be  
 12 approved under the Building Regulations.  
 13 Q. I see. So was there a concern about the potential cost  
 14 of putting sprinklers into that --  
 15 A. No, no, I'm sorry, maybe I overemphasised the concern  
 16 about sprinklers. I mean, when we met with the design  
 17 team, we said, "You could end up with a requirement for  
 18 sprinklers in certain parts of the building".  
 19 Q. Right, yes.  
 20 A. So there may have been a concern, but they didn't  
 21 express it to me.  
 22 Q. Just looking back at this email here on 23 October, it's  
 23 headed that it's dealing with a workshop, and attached  
 24 to it, we can see from the top, are various Grenfell  
 25 work packages documents.

29

1 Do you remember looking at those Grenfell work  
 2 packages documents?  
 3 A. No, I don't. I probably wouldn't have looked at them,  
 4 if I'm honest, unless they had a fire dimension.  
 5 Q. I see.  
 6 Can we just have a look at those. If we bring them  
 7 up, {SEA00006395}, and if we can blow up the top of  
 8 that. Do you see there, we can see there are a number  
 9 of items at the beginning in these work packages which  
 10 are about overcladding, some to the podium, insulation,  
 11 and then in that second box down, it says:  
 12 "Overcladding: Podium - Insulation/Pre-cast  
 13 concrete.  
 14 "Overcladding: Insulation/Zinc rainscreen."  
 15 Do you see that?  
 16 A. Yes, I do, yeah.  
 17 Q. So that's making clear that overcladding is definitely  
 18 still a big part of this project, isn't it?  
 19 A. Yes. As I say, I didn't look at any of these packages.  
 20 If we had been asked to look at these, then that would  
 21 have been somewhat different, but --  
 22 Q. But if they're being sent --  
 23 A. -- the whole tenor of the email was: "We are having  
 24 a meeting to discuss the various workshops"; it didn't  
 25 say, "Would you, Exova, look at all of these work

30

1 packages and give us your comments".  
 2 Q. I see. So is that the point, that you expect there to  
 3 be a specific email to you saying, "You need to look at  
 4 this in the context of the fire strategy"?  
 5 A. Yes, I mean, we would not expect to look at a whole  
 6 series of building packages just because we were part of  
 7 the design team, we would want something specific to go  
 8 on.  
 9 Q. I see.  
 10 So let's come back, then, on 31 October 2012 we know  
 11 the Studio E stage C report was issued. Can we look at  
 12 that now. So if we go to {ART00008396}. If we can blow  
 13 up this email at the top. Thank you.  
 14 So this is Adrian Jess from Studio E on  
 15 31 October 2012 emailing, and the subject is "Stage C  
 16 report", and he says:  
 17 "Please find attached the studio e ftp location for  
 18 the Stage C report."  
 19 And a link is provided to the stage C report. Do  
 20 you see that?  
 21 A. Yes, I do.  
 22 Q. You are copied in to that, you are on the cc list. Your  
 23 name appears one line from the bottom on the cc list.  
 24 A. But we weren't the primary recipients of that, were we?  
 25 We were just copied in. And that happens a lot on

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1 projects, you get copied in. It's a sort of scattergun  
 2 approach: copy everybody in.  
 3 Q. Did you actually access the link? Did you look at the  
 4 stage C report?  
 5 A. No, I didn't. No, I didn't see that I needed to. There  
 6 was no -- you can see there there's instructions or  
 7 requests for information from some of the people to whom  
 8 that report has been sent, but there's nothing asking us  
 9 to look at it.  
 10 Q. Wasn't that a really important document --  
 11 A. No.  
 12 Q. -- prepared by the architects --  
 13 A. Not necessarily.  
 14 Q. -- that would inform your work on the outline fire  
 15 safety strategy? It's setting out effectively their  
 16 proposals, where they have got to by that time, for the  
 17 concept design stage.  
 18 A. If I can broaden this out, we don't routinely look at  
 19 RIBA stage C or stage D reports unless we're  
 20 specifically asked to do so. I mean, on a current  
 21 project, I was specifically asked to look at a section  
 22 of a stage 3, which is the same as stage C, report which  
 23 had fire safety implications, and the architect sent me  
 24 an extract from the stage C report which enabled me to  
 25 comment on that.

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1 Now, to just send me a link to an FTP site without  
 2 any instruction as to what I should do with it, then  
 3 I would ignore it, which is what I did.  
 4 Q. But as someone who is as experienced as you are, you  
 5 have worked in Building Control for many years, wouldn't  
 6 that be a document which you could very easily look at  
 7 and work out which bits were relevant to you?  
 8 A. No, I don't think my Building Control experience is  
 9 particularly relevant here. I think it's absolutely the  
 10 case that if somebody wants an answer from somebody,  
 11 they will ask them the question. Otherwise you spend  
 12 lots of time looking at things which may have no  
 13 interest for you. Bear in mind these are very lengthy  
 14 documents.  
 15 Q. Yes. Look, I appreciate you didn't see this at the  
 16 time. I mean, did you ever -- so you didn't ever look  
 17 at this stage C report?  
 18 A. I've never seen the stage C report.  
 19 Q. No.  
 20 Can we look at it now. I want to take you to a few  
 21 sections just to see what information was in it. This  
 22 is at {MAX00000445}. So this is the stage C report. If  
 23 we look at page 27 {MAX00000445/27}, there is a section  
 24 that begins, "Design Approach: Over Cladding". Do you  
 25 see that?

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1 A. I do, yes.  
 2 Q. What we get is a narrative description starting with the  
 3 existing building, and then if you go over on to page 28  
 4 {MAX00000445/28}, in the middle, under "Materials", it  
 5 says:  
 6 "A zinc composite rainscreen cladding is proposed to  
 7 the upper levels."  
 8 It talks about the advantages of zinc, and we can  
 9 see some sketches on the right, some drawings on the  
 10 right, which show you the proposed cladding.  
 11 A. Right.  
 12 Q. Then if you go to page 31 {MAX00000445/31} we see some  
 13 plan and sections on that page showing overcladding  
 14 incorporating the zinc cladding. That's actually clear  
 15 from the bottom section on that page.  
 16 Then if we go to page 32 {MAX00000445/32}, at the  
 17 top it's called an isometric, and you see there, if we  
 18 can zoom in to that, it's got the rainscreen cladding on  
 19 the outer layer with the new aluminium windows, and then  
 20 you can see it's got insulation as the layer in the  
 21 middle, and then the cladding rails, et cetera. So it's  
 22 showing you the build-up of the cladding system.  
 23 A. Right.  
 24 Q. Then at the bottom of page 32, if we can look at that,  
 25 it says, "Cladding ideas", and it's looking at various

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1 options. I appreciate these are options, but it's  
 2 setting out rainscreen aluminium, for example,  
 3 rainscreen zinc, and giving various photographs.  
 4 Then if we can go on in this report to page 82  
 5 {MAX00000445/82}, this is within the Max Fordham part of  
 6 this stage C report, within their own stage C report,  
 7 and we see the heading at the top, "4.0 Refurbishment  
 8 response to existing energy & environmental issues".  
 9 We can see in the table on the far right that the  
 10 insulation is said to be "New, Celotex FR5000"; can you  
 11 see that?  
 12 A. I can, yes.  
 13 Q. We have "Zinc Cladding (New Rain Screen)", "Ventilated  
 14 Cavity" and then "Insulation", and it's giving U-values,  
 15 et cetera.  
 16 On the next page, page 83 {MAX00000445/83}, under  
 17 the heading "Glazing Infill Panel", we see again two  
 18 rows with "Insulation (New, Celotex FR5000)"; do you see  
 19 that?  
 20 A. I do, yes.  
 21 Q. Looking at this now, do you agree it does contain some  
 22 specific information about what was proposed, including  
 23 the specific type of insulation to be used in the outer  
 24 cladding?  
 25 A. Yeah, I can see that now, yes.

35

1 Q. It's also clear that the overcladding is at all levels  
 2 of the building, isn't it? It's not just they're  
 3 overcladding part of it or the lower levels.  
 4 A. No, no, by overcladding, I assume it means the whole  
 5 building.  
 6 Q. Yes.  
 7 A. Yes.  
 8 Q. If we go to page 68 {MAX00000445/68}, I just want to  
 9 pick this up, because you said earlier you didn't know  
 10 and you certainly didn't anticipate that your  
 11 design note would be included in this stage C report.  
 12 It was; it was included under item 6.0, "Fire Strategy",  
 13 and this is your design note of 12 September 2012. Do  
 14 you see that?  
 15 A. I do, yes.  
 16 Q. As you say, that's because that's what Studio E had at  
 17 the time.  
 18 A. That's all they had.  
 19 Q. Yes.  
 20 A. Yes, indeed.  
 21 Q. Yes.  
 22 As we saw, this email to you of 31 October with this  
 23 stage C report was timed at 11.37 am, so it came in the  
 24 morning. Your issue 1 of the outline fire strategy was  
 25 emailed by Margaret Treanor to Studio E at 16.21 that

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1 afternoon.

2 A. Right.

3 Q. We can look at that. Let's just check that time.  
4 {EX000000518}. If we can blow that up.

5 So we see that Margaret Treanor -- is she  
6 administrative assistant at Exova?

7 A. Yes, she is, yes.

8 Q. And she has emailed across your outline fire safety  
9 strategy:

10 "Please find ... Issue 01 ... for the above  
11 project ... sent by email only. A paper copy can be  
12 provided on request ..."

13 Did you notice that the Studio E stage C report had  
14 come in before you finalised?

15 A. Probably not. I mean, the lead-in to issuing a report  
16 in our organisation can sometimes be as long as three or  
17 four days, depending on how many reports Ms Treanor has  
18 to issue. So it may -- I may have asked her to issue  
19 this some days previously. But I'm not quite sure what  
20 the -- you're asking about its position relative to the  
21 stage C report.

22 Q. It was really whether you --

23 A. It's just a coincidence, isn't it, really?

24 Q. It was really whether you had noticed that morning that  
25 the stage C report has come in and thought, "Well, I'm

37

1 just trying to finalise this outline fire safety  
2 strategy", and whether it occurred to you to have a look  
3 at it.

4 A. No, no, I may not even have seen that email that  
5 morning. I mean, we go to lots of meetings, we deal  
6 with lots of projects at the same time. I may not have  
7 seen that email on the morning it was sent.

8 Q. Yes.

9 Now, going back to that outline fire safety  
10 strategy, and we're sticking with the cladding at the  
11 moment, so this is {EX000000519/5}, at paragraph 2.1,  
12 this is early on in the report, you have outlined that  
13 the building work will have to be carried out in  
14 conformity with the requirements of schedule 1 of the  
15 Building Regulations, and you have explained there what  
16 the requirements of schedule 1 are. So we have B4,  
17 external fire spread, there as item (d); do you see  
18 that?

19 A. I do.

20 Q. You have said at the bottom there:

21 "Compliance with these requirements is normally  
22 achieved by meeting the standards contained in Approved  
23 Document B (ADB) and/or BS 9991."

24 Do you see that?

25 A. I do.

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1 Q. Then the only other reference to the B4 functional  
2 requirement is at page 8 {EX000000519/8} of this report,  
3 if we can go on to that. This is at item 3.1.4, and  
4 this is headed "Compliance with B4 (external fire  
5 spread)", and you say:

6 "It is considered that the proposed changes will  
7 have no adverse effect on the building in relation to  
8 external fire spread but this will be confirmed by an  
9 analysis in a future issue of this report."

10 A. Right.

11 Q. Do you see that?

12 A. I do, yes.

13 Q. Can you confirm that that's the only guidance you gave  
14 in this report about the B4 functional requirement?

15 A. Yes, it is.

16 Q. Can you explain why that was?

17 A. Because that -- we didn't have any other information to  
18 say anything else. This is why we say, "This will be  
19 confirmed by an analysis in a future issue of this  
20 report".

21 Q. I see.

22 Just breaking this down, we know that the drawings  
23 that your report listed in the introduction section --  
24 and we have a look at those -- those were just general  
25 arrangement drawings, so they don't --

39

1 A. They were plans.

2 Q. Yes, so they contain no sections or elevations of the  
3 tower.

4 A. No.

5 Q. So what were the proposed changes which, in your view,  
6 would not have had an adverse impact on external fire  
7 spread?

8 A. Well, there are three aspects to B4: one is the fire  
9 performance of roof coverings; there is the performance  
10 of the external walls in relation to what they're  
11 constructed of; and there is space separation, which  
12 I think we looked about at some length yesterday.

13 At the time that I wrote this report, there were no  
14 details of any changes to the external wall construction  
15 that we could look at and comment on, but we were aware  
16 that there would be no space separation or roof covering  
17 implications because they weren't being altered. In  
18 other words, to put it -- the building wasn't moving or  
19 they weren't putting other buildings near to it.

20 So, at that point, there were no implications for  
21 B4, but we do reserve the right, if I can put it that  
22 way, to carry out an analysis in a future report, should  
23 that change.

24 Q. You said that you didn't have sufficient information to  
25 be able to make an assessment in relation to the

40

1 cladding, but why didn't you simply flag that in this  
 2 report and say clearly, "I have had inadequate  
 3 information to make any assessment at all"?  
 4 A. That's not the way that we chose to do it. The truth of  
 5 the matter was that we didn't have any details that we  
 6 could comment on.  
 7 Or put it another way, we weren't asked to look at  
 8 anything which would give us the necessary details.  
 9 Q. Given what we have been through today and yesterday, and  
 10 the fact that you had been told about the overcladding  
 11 and had been sent some details of what that might  
 12 involve, do you agree that this statement was  
 13 potentially misleading for the readers of it, because  
 14 they might have thought that the cladding, those  
 15 changes, would have no adverse effect?  
 16 A. In theory they might not have had any adverse effect.  
 17 If we had stopped at, "It is considered that the  
 18 proposed changes will have no adverse effect on the  
 19 building in relation to external fire spread", full  
 20 stop, that could be questioned, in my view. But we  
 21 weren't in a position to say that unequivocally, you  
 22 know, that there are no implications for external fire  
 23 spread, which is why we said we would confirm this by  
 24 a future analysis.  
 25 Q. Do you agree that this was potentially misleading

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1 because it implied that the proposed works which did  
 2 involve overcladding would have had no adverse effect on  
 3 the building in relation to external fire spread?  
 4 A. Misinterpreted by whom?  
 5 Q. By those reading this report, so Studio E, the TMO.  
 6 A. Well, Studio E -- well, I'm not sure that TMO would have  
 7 registered this, but as far as Studio E are concerned,  
 8 I would have expected them to come back and say, "Do you  
 9 know what we're doing on the external walls?" or "Does  
 10 this statement mean that we're in the clear with regard  
 11 to B4 and don't need to do anything else?"  
 12 Q. I see, so you expected this to be the subject of  
 13 a follow-up from them?  
 14 A. Indeed, yes. I mean, I could have worded it  
 15 differently, I could have said, "There are insufficient  
 16 details at this stage to confirm complete compliance  
 17 with B4".  
 18 Q. Yes.  
 19 A. You know, that's a choice of words which might have been  
 20 more appropriate at the time, but we did say we will  
 21 carry out a future analysis.  
 22 Q. Yes, as to that, the future analysis, what were you  
 23 envisaging when you wrote this? What kind of analysis  
 24 were you thinking would be undertaken?  
 25 A. Well, if this were another project, probably we would

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1 have sat down with the architect and maybe the building  
 2 services engineer and gone through their proposals for  
 3 overcladding, insulation and all the rest of it. We  
 4 would have looked at materials, we would have looked at  
 5 cavity barriers, firestopping and all the rest of it.  
 6 We didn't have that sort of meeting.  
 7 Q. I appreciate you didn't, but at the time you wrote this,  
 8 "This will be confirmed by an analysis in a future issue  
 9 of this report" --  
 10 A. Well, I anticipated that would happen and that's why  
 11 I put that wording in there, that there would be  
 12 a future analysis.  
 13 Q. Yes.  
 14 A. As things turned out, it never happened.  
 15 Q. Which parts of the B4 requirement did you envisage would  
 16 be considered in that future analysis?  
 17 A. Well, it would have been cladding, I guess, because I've  
 18 already said that the works that were proposed had no  
 19 implications for space separation or the roof covering.  
 20 Q. Yes, and I'm going to put that to you, that actually  
 21 what was in your mind here was space separation and the  
 22 roof, and that you weren't actually thinking about  
 23 whether it would adequately resist the spread of fire  
 24 under the B4.(1) requirement?  
 25 A. I think what I'm saying here is that we don't actually

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1 know whether or not in the final analysis B4 would be  
 2 satisfied, which is why we say we need to look at it --  
 3 to carry out an analysis in the future.  
 4 Q. Just to be clear, we know that Approved Document B  
 5 divides up the B4 requirement into three different  
 6 sections: section 12, which deals with the external  
 7 wall; section 13, which deals with space separation; and  
 8 section 14, which deals with roof coverings.  
 9 A. Yes, I just explained that.  
 10 Q. Yes. So which parts of ADB were you envisaging would be  
 11 the subject of that future analysis?  
 12 A. At that point in time, it might have included all three  
 13 parts. I mean, I don't know. We didn't have sufficient  
 14 information at that time to confirm one way or the  
 15 other, which is why we said we would carry out  
 16 an analysis.  
 17 SIR MARTIN MOORE-BICK: Mr Ashton, just help me to make sure  
 18 I have understood this correctly: would I be right in  
 19 thinking that when you refer to "The proposed changes",  
 20 you are referring to all the changes proposed to the  
 21 building, including the cladding?  
 22 A. We didn't specifically say that in this report.  
 23 SIR MARTIN MOORE-BICK: No, but is that how I should  
 24 understand it?  
 25 A. That's how you should understand it, yes, sir.

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1 SIR MARTIN MOORE-BICK: Thank you, that's helpful.  
 2 MS GRANGE: Do you accept that the use of the word  
 3 "confirmed" there, as in "confirmed by analysis in a  
 4 future issue of this report", was also potentially  
 5 misleading if you had not actually considered the  
 6 substance of the cladding proposals at this stage?  
 7 A. Well, if they were not adequate, we wouldn't have  
 8 confirmed that they were. I mean ...  
 9 Q. But, do you see, the use of the word "confirmed"  
 10 suggests that you have got a fairly firm view that there  
 11 isn't a problem, but you will just confirm that later?  
 12 A. I think that's one way you could interpret it. That's  
 13 not the way I intended it to be interpreted.  
 14 Q. But do you agree that you shouldn't, knowing that any  
 15 form of cladding was to be used, have said that the  
 16 proposed changes will have no adverse effect?  
 17 A. This is a statement of the future tense, "will have no  
 18 adverse effect", but that presupposes that we satisfy  
 19 ourselves at some point in the future that everything is  
 20 okay.  
 21 Q. Yes. But do you agree with me that you couldn't  
 22 possibly have known that, given that any form of  
 23 cladding would have a potential impact on the building's  
 24 compartmentation?  
 25 A. I accept that it is open to interpretation, yes.

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1 Q. Would you agree, looking at this now, that you should  
 2 have highlighted the significant effect that  
 3 overcladding could have on the building's  
 4 compartmentation and its ability to comply with the  
 5 Building Regulations?  
 6 A. I'm not sure that I would accept that I needed to  
 7 highlight that particular aspect of the building at this  
 8 stage.  
 9 Q. So you don't think that you needed to highlight that the  
 10 overcladding could have a potentially significant effect  
 11 on the ability of the building to comply with the  
 12 Building Regulations?  
 13 A. Well, if an acceptable cladding system had been proposed  
 14 and we were aware of it, then the wording in this report  
 15 would have been somewhat different. But we didn't know  
 16 what was being proposed.  
 17 Q. Did it ever occur to you around this time -- and we will  
 18 see in due course that you use exactly the same wording  
 19 in the second issue and the third issue -- that you  
 20 might have created a false sense of security within the  
 21 design team about what they were doing with the external  
 22 wall?  
 23 A. They might have thought that, but they might have  
 24 thought, "Well, maybe we should check with Exova that  
 25 that is the case".

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1 Q. And also a false sense of security for the ultimate  
 2 client, the TMO, who received this report?  
 3 A. Maybe. I mean, I don't know how critically TMO looked  
 4 at the report. We never had any feedback from TMO on  
 5 anything, really.  
 6 Q. Can we just look at Mr Sounes' evidence on this, if we  
 7 go to his witness statement. This is at  
 8 {SEA00014273/73}, and I want to look at what he says at  
 9 paragraph 149. So he says there:  
 10 "I do not recall when I read the section regarding  
 11 Part B4 of the [outline fire safety strategy], however  
 12 on re-reading it, I note that Exova did not identify  
 13 that the proposed overcladding works would present any  
 14 specific problems or difficulties in respect of  
 15 requirement B4 of the Building Regulations, therefore  
 16 there was nothing that suggested to me there would have  
 17 been a risk in this regard."  
 18 Do you see that?  
 19 A. Yes, indeed.  
 20 Q. In evidence, Mr Sounes stated that he understood the  
 21 statement you made on B4 to mean that it was too soon  
 22 for Exova to comment, but that from Studio E's point of  
 23 view, this confirmed that there was no concern. That  
 24 was his evidence to us on {Day8/52:9-11}.  
 25 Did you know at the time that the statement had

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1 given Studio E comfort that there was no concern about  
 2 the external fire spread in relation to the proposed  
 3 changes?  
 4 A. No, I didn't know that.  
 5 Q. Do you also agree that without addressing the cladding,  
 6 the report would not be an all-encompassing document  
 7 which provided an overview of how a fire could impact on  
 8 the building?  
 9 A. I accept that, yes.  
 10 Q. And it wouldn't consider all aspects of fire safety and  
 11 protection in a unified manner, looking at all key  
 12 features of the building?  
 13 A. At that point, no, I don't think it did. I mean, the  
 14 statement in this witness statement is: all right,  
 15 Studio E thought that everything was okay, but they  
 16 didn't ask me whether -- they didn't ask me: is  
 17 everything okay?  
 18 Q. So even if the information that you had was lacking at  
 19 this stage -- I want to return to something we discussed  
 20 briefly yesterday -- why didn't you at least set out the  
 21 performance requirements for the external wall,  
 22 following Approved Document B, ie the guidance given in  
 23 section 12 of ADB?  
 24 A. Well, I think I answered it yesterday: I wouldn't expect  
 25 to quote every single part of the regulations in

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1 a fire strategy report.  
 2 Q. How familiar were you at this time with those parts of  
 3 Approved Document B? We know that you hadn't done  
 4 an overcladding high-rise project before. Were you  
 5 familiar with the provisions in section 12 of Approved  
 6 Document B dealing with the external wall?  
 7 A. Yes, I was.  
 8 Q. Do you think it would have been helpful for the design  
 9 team to have known about these performance requirements  
 10 when designing the overcladding?  
 11 A. I think that, had we had a specific meeting to discuss  
 12 those proposals, which were a fairly significant part of  
 13 the design, then all of those things would have come  
 14 out. But we never had a dialogue with them.  
 15 Q. I see. So you anticipated that at a meeting you might  
 16 have explained the performance requirements to them?  
 17 A. Yes. In another project, for example, the architect or  
 18 the project manager would contact us and would say, "We  
 19 would now like to talk about how we're going to deal  
 20 with the external wall construction" -- or in this case  
 21 the overcladding -- "can we have a meeting". That never  
 22 happened.  
 23 MS GRANGE: I see.  
 24 Mr Chairman, that's probably a good moment, because  
 25 I'm coming on to look at B3 next and I would rather do

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1 that in one go.  
 2 SIR MARTIN MOORE-BICK: Right, thank you.  
 3 Well, we will have a break now, Mr Ashton, give you  
 4 a chance to stretch your legs.  
 5 THE WITNESS: Okay.  
 6 SIR MARTIN MOORE-BICK: We will start again at 11.30, so if  
 7 you would like to go with the usher, she will look after  
 8 you now. Thank you very much.  
 9 Please don't talk to anyone about your evidence.  
 10 THE WITNESS: No.  
 11 SIR MARTIN MOORE-BICK: You probably won't get the chance,  
 12 but if you do, don't do it.  
 13 (Pause)  
 14 Right, 11.30, please. Thank you.  
 15 (11.16 am)  
 16 (A short break)  
 17 (11.30 am)  
 18 SIR MARTIN MOORE-BICK: All right, Mr Ashton?  
 19 THE WITNESS: Yes, thank you.  
 20 SIR MARTIN MOORE-BICK: Good, thank you.  
 21 Ms Grange.  
 22 MS GRANGE: Thank you, yes.  
 23 I now want to look at what you have included under  
 24 requirement B3 in this first issue of the outline fire  
 25 safety strategy. If we can bring up {EX000000519/7},

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1 and at the bottom of that page we have a section headed  
 2 "Compliance with B3", and you have dealt with fire  
 3 resistance of elements of structure, and then  
 4 compartmentation, and you say:  
 5 "Compartment walls and/or floors will be  
 6 provided ..."  
 7 And you have said where walls and floors will be  
 8 provided.  
 9 If you go over on to the next page, 8  
 10 {EX000000519/8}, you have explained what the standard of  
 11 fire resistance will be of compartment walls and floors,  
 12 and that doorways within compartment walls will be  
 13 fitted with self-closing doors, having a 60-minute  
 14 standard of fire resistance.  
 15 Can you explain why there is no reference at all in  
 16 this section to functional requirement B3.(4)? That's  
 17 the one that states:  
 18 "The building shall be designed and constructed so  
 19 that the unseen spread of fire and smoke within  
 20 concealed spaces in its structure and fabric is  
 21 inhibited."  
 22 Given that we know the building was going to be  
 23 overclad.  
 24 A. Well, it isn't in there. I mean, I don't think I made  
 25 a conscious decision to make any statement about cavity

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1 barriers at that point in time.  
 2 Q. No. Can you remember why that was?  
 3 A. No, not really. I mean, I think that if we had more  
 4 details at that stage, we would have said something more  
 5 about it.  
 6 As I said earlier, it's easy to put in a number of  
 7 conditions without saying how they were -- or a number  
 8 of statements, but without saying how those particular  
 9 requirements will be met. It's just the statement of,  
 10 you know, "This is what B3 requires, however we haven't  
 11 got anything to say about it at this stage".  
 12 Q. Yes, but my point is: given that we know there is going  
 13 to be an overcladding, and section 9 of Approved  
 14 Document B contains design guidance relevant to  
 15 compliance with the functional requirement, why don't  
 16 you specifically refer to B3.(4) or section 9 of  
 17 Approved Document B in this part of your report?  
 18 A. I didn't feel it necessary at this stage.  
 19 Q. Why haven't you identified the locations within  
 20 Grenfell Tower that form concealed spaces?  
 21 A. As far as I was concerned, there were none in the  
 22 existing structure. I mean, the building is  
 23 a reinforced concrete building. There weren't any  
 24 cavities proposed within the individual constituent  
 25 parts that we were looking at, as far as I know.

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1 Q. Does that mean that when you are drafting this B3  
2 section, you weren't thinking at all about the  
3 implications of the external wall and the overcladding?  
4 A. Probably not, no, correct.  
5 Q. And that explains, does it, why you don't identify the  
6 need for cavity barriers in the external wall complying  
7 with section 9 of ADB?  
8 A. Yes, yes.  
9 Q. And why you don't refer to the fire resistance  
10 performance of cavity barriers or the locations of  
11 cavity barriers, including key locations like around the  
12 windows?  
13 A. No. That's correct.  
14 Q. Looking at this now, and given what you said in relation  
15 to B4 -- I think your final answer was that you were  
16 thinking about the overcladding -- do you agree that you  
17 should have included those performance requirements?  
18 A. I think, yes, with the wisdom of hindsight, one could  
19 have provided more details with regard to all parts of  
20 the Building Regulations. You know, maybe we should  
21 have said, "There are other parts of B3 that need to be  
22 considered in the future, particularly when more  
23 constructional details are available", but we don't  
24 normally do that routinely.  
25 Q. I see.

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1 A. But judging -- if, in fact, Studio E felt they hadn't to  
2 do anything more in relation to the external walls based  
3 on what you showed me before we broke, then maybe, with  
4 the wisdom of hindsight, it might have been helpful.  
5 Q. Yes.  
6 Were you aware at this time that Grenfell Tower had  
7 a stay-put evacuation strategy?  
8 A. Yes, that was -- stay-put strategy applied across the  
9 board for all high-rise residential buildings.  
10 Q. And that strategy would rely on compartmentation,  
11 wouldn't it?  
12 A. It was indeed, yes.  
13 Q. Why is that not mentioned anywhere in your report, just  
14 those basic things, that here is a building, stay-put  
15 strategy, compartmentation is key?  
16 A. A good question. I mean, we don't normally make those  
17 sort of statements every time we deal with a block of  
18 apartments. Where we're dealing with a brand new  
19 apartment, there will be -- a brand new apartment block,  
20 I should say, there will be a statement about evacuation  
21 strategy which will spell out -- not in a lot of detail,  
22 but will explain the philosophy behind a stay-put  
23 strategy. Here we were dealing with alterations to part  
24 of an existing building.  
25 Q. Yes.

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1 While we're looking at this B3 part of your report,  
2 if we just go back to page 7 {EX000000519/7} and look at  
3 the bottom of the page.  
4 A. Right.  
5 Q. So under that first subheading, "Fire resistance of  
6 elements of structure", you have talked about:  
7 "All new elements of structure will be considered to  
8 have the same standard as that of the existing elements.  
9 This is assumed to be 120 minutes for the structural  
10 frame and 60 minutes for floors."  
11 Isn't it right that Approved Document B requires the  
12 floors to provide 120 minutes fire resistance and  
13 sprinklers if you are following that guidance?  
14 A. No, this building would have been designed to satisfy  
15 the London Building Acts and bylaws, which required  
16 120 minutes for the structural frame and 60 minutes for  
17 the floors.  
18 Q. I see. So it wasn't relevant to point out in this that,  
19 on current design guidance, it wouldn't have met the  
20 current design standards?  
21 A. No, we wouldn't normally do that.  
22 Q. I see.  
23 Let's look at what you say about B1, means of  
24 warning and escape. You deal with B1 on page 6  
25 {EX000000519/6} of the report, if we can go to that.

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1 A. Right.  
2 Q. And it goes over into page 7 {EX000000519/7}.  
3 In that section, and under heading B1, you have not  
4 identified what evacuation strategies were adopted for  
5 the residential and the non-residential areas?  
6 A. No, I haven't.  
7 Q. Do you know why that is?  
8 A. No. No.  
9 Q. Wouldn't that be something that ought to have been  
10 included in a fire strategy report, those different  
11 evacuation strategies for different parts of the  
12 building?  
13 A. Yes, probably it should have done.  
14 Q. Then in the means of escape section, that begins towards  
15 the top half of that page, you identify that both the  
16 boxing club and the offices will share a means of escape  
17 with the apartments in the residential part of the  
18 tower. You say that under both of those headings.  
19 Now, do you agree that that would have been  
20 a departure from the guidance in Approved Document B?  
21 A. Yes. Yes.  
22 Q. Because isn't it right that paragraph 2.51 of Approved  
23 Document B {CLG00000224/33} provided that for buildings  
24 with more than three storeys, stairs can serve both  
25 flats and other occupancies only in certain defined

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1 circumstances, including if the stair was separated from  
 2 the other occupancies on the lower storeys; that's  
 3 right, isn't it?  
 4 A. It is correct, yes. I mean, this is an existing  
 5 building with an existing mixed use. I don't think that  
 6 we would have wanted to highlight particularly that this  
 7 was contrary to current recommendations, because it  
 8 already was. We were trying to do the best that we  
 9 could to make sure that a fire in a non-residential part  
 10 of the building didn't make escape from the remainder of  
 11 the building inadequate.  
 12 Q. But why --  
 13 A. But there were no means by which you could effect that,  
 14 other than by the fire service attending and knocking on  
 15 people's doors.  
 16 Q. But why wouldn't you want to highlight it and then  
 17 explain how you have justified or mitigated it?  
 18 A. That's just the way it was written.  
 19 Q. We're going to come back to this point again --  
 20 A. Okay.  
 21 Q. -- because we know that Dr Pearson adds some text to  
 22 issue 2, and we will talk about that in due course.  
 23 A. Okay.  
 24 Q. Let's look at B5, facilities for the fire service. This  
 25 is addressed on page 8 {EXO00000519/8} --

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1 A. Right.  
 2 Q. -- of your report, if we can zoom in on that. It's at  
 3 3.1.5, B5, and we've got a sentence there at the  
 4 beginning about the dry rising main, it's the very first  
 5 part:  
 6 "A new inlet to the existing dry rising main will be  
 7 provided in a location where it will be within 18m ...  
 8 where a pumping appliance could pull up."  
 9 Do you see that?  
 10 A. I do, yes.  
 11 Q. Could you explain why you didn't identify that the  
 12 original design guidance for the building, CP3 1971,  
 13 would have required a wet rising main, not a dry rising  
 14 main?  
 15 A. I'm not sure that CP3 was applied to this building.  
 16 I think it was the London County Council code of  
 17 practice, given the age of the building.  
 18 Q. Well, we have had evidence from Dr Lane in Phase 1 that  
 19 CP3 1971 would have applied, and, indeed, I think  
 20 Mr Todd and Dr Lane are agreed that the building should  
 21 have been provided with a wet riser given the height of  
 22 the building; it was more than 60 metres.  
 23 A. I'm sorry --  
 24 Q. Yes.  
 25 A. -- we didn't design -- I don't believe that the design

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1 of this building was to CP3 chapter IV, part 1.  
 2 Q. I see.  
 3 A. I think it -- the building was erected, we think, in  
 4 1971, but the negotiations with the Greater London  
 5 Council prior to the building receiving approval would  
 6 have been conducted using a different code of practice.  
 7 Now, it's true to say that a building of that height  
 8 nowadays would require a wet main, but it didn't in  
 9 those days.  
 10 Q. Why wasn't that something, even that point, worth  
 11 highlighting in the report?  
 12 A. Because that would then imply that a wet rising main had  
 13 to be introduced retrospectively to a building which  
 14 didn't require one in the first place.  
 15 Q. Did you give any consideration to whether the existing  
 16 dry riser system was compliant with current  
 17 requirements?  
 18 A. No.  
 19 Q. Did you consider whether the creation of new residential  
 20 units on the lower floor would increase the load on the  
 21 existing dry riser system?  
 22 A. No, because the design of residential buildings, if you  
 23 exclude the non-residential elements in this building,  
 24 assume that you're only going to get a fire in one  
 25 apartment or one flat, and that will not alter the

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1 requirements for the rising main in any way.  
 2 Q. Did you consider whether the creation of new residential  
 3 units would make access and availability of adequate  
 4 facilities for the fire service more unsatisfactory than  
 5 before the refurbishment works?  
 6 A. No, I didn't consider that to be the case. It was quite  
 7 low down in the building.  
 8 Q. Yes.  
 9 Did you consider whether the non-compliance of the  
 10 dry riser with current regulations should be drawn to  
 11 the TMO's attention so that they could take the  
 12 potential risks of retaining the existing system into  
 13 account when determining how to manage the building?  
 14 A. I think I said earlier that, in statutory terms, there  
 15 is no obligation on a building owner to bring his or her  
 16 building up to current building regulation standards.  
 17 If there were, then the only mechanism for that would be  
 18 the Regulatory Reform Order.  
 19 Q. Yes.  
 20 A. The Building Regulations do not allow Building Control  
 21 authorities to go into existing buildings, of which  
 22 there are thousands, and say, "You have to upgrade your  
 23 building to current building standards". That might  
 24 change as a result of future legislation, but currently  
 25 there is no legal obligation to increase the fire safety

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1 standards in an existing building.  
 2 Q. I fully appreciate that, Mr Ashton.  
 3 A. Yeah.  
 4 Q. That's understood. But the question I'm asking is: was  
 5 it not important that the TMO understood that it  
 6 wouldn't have complied with current guidance and that  
 7 was a risk that they ought to be taking into account  
 8 when managing the building as the responsible person?  
 9 A. Well, that -- the appropriate vehicle for that would be  
 10 the risk assessment under the RRO, which was done by  
 11 others.  
 12 Q. I see. So you think that's a matter for the fire risk  
 13 assessor and not for someone doing a fire strategy for  
 14 the refurbishment?  
 15 A. Yes. If we do a risk assessment of an existing  
 16 building, we would draw attention to those aspects of  
 17 that building which don't meet current requirements, and  
 18 with or without a recommendation for improvements to be  
 19 made.  
 20 Q. I see. I'm struggling as to why --  
 21 A. What you're implying is that we should have --  
 22 SIR MARTIN MOORE-BICK: Sorry, had you finished?  
 23 A. Well, I was just going to say what you were implying is  
 24 that we should have said to the TMO, "We think you  
 25 should bring this building up to current standards".

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1 MS GRANGE: No. What I'm suggesting is that, given this is  
 2 an old building, it's been in existence for a long time,  
 3 you know, design codes have moved on, it was important  
 4 information for the TMO to know that, in a building of  
 5 this height, module design guidance would require a wet  
 6 rising main.  
 7 A. Yes, I think I answered that. I think I said that that  
 8 would be a function of the risk assessment carried out  
 9 under the RRO.  
 10 Q. Yes, okay.  
 11 So now I want to consider what happened after you  
 12 had issued this first issue of your report and before  
 13 issue 2, which was in October 2013, so a whole year  
 14 later was issue 2.  
 15 Shortly after the issue of this report, which was on  
 16 31 October, on 16 November 2012, Adrian Jess of Studio E  
 17 sent you a link to all of the current drawings on an FTP  
 18 site. Can we look at that. This is {SEA00006666}.  
 19 Here we have that email, and you are one of the  
 20 recipients of that email, you are in the main list,  
 21 16 November, and he says:  
 22 "Following an earlier telephone call with Matt @  
 23 Max Fordhams I have uploaded a pdf copy of all the  
 24 current drawings to the studio e FTP site ..."  
 25 Did you understand FTP to mean file transfer

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1 protocol?  
 2 A. I think so, yes.  
 3 Q. Right. So it's a site where you can access large  
 4 documents; is that correct?  
 5 A. Indeed, yes.  
 6 Q. There you have got the link, and then they say:  
 7 "The intention is to present a draft copy of the  
 8 stage D report at the Project meeting next Thurs (22nd).  
 9 Can you please issue a copy of any relevant information  
 10 for inclusion in the report beforehand so that areas  
 11 requiring further coordination can be identified before  
 12 the meeting."  
 13 Do you see that?  
 14 A. I do, yes.  
 15 Q. Do you remember receiving this email?  
 16 A. I think I must have received it, yes.  
 17 Q. Can you remember actually accessing any of the material  
 18 that was sent to you by Studio E?  
 19 A. I don't believe I did on this occasion.  
 20 Q. We can see an email that you send back to Mr Jess.  
 21 Let's look at this, {EX000000601/3}. So if we look at  
 22 the email you send at the top of that page, you say:  
 23 "Adrian  
 24 "I haven't logged on to this FTP site before. How  
 25 can I get on to it?"

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1 "Kind regards  
 2 "Terry."  
 3 A. Yes, I remember sending that.  
 4 Q. Then if we scroll up on to page 2 {EX000000601/2}, you  
 5 get a longer email from Mr Jess in which he says at the  
 6 very end of that he has updated certain drawings on the  
 7 FTP site and he sends you another link, a new link is  
 8 sent. Do you see that?  
 9 A. I do, yes, yeah.  
 10 Q. And then one email up, on 28 November, Mr Jess says to  
 11 you that they're having a few email problems and the  
 12 email below has just bounced back, and then he talks  
 13 about a design workshop "including the TMO at our  
 14 offices it might be worth you attending".  
 15 So looking at these exchanges now, does that prompt  
 16 any recollection in whether you ever actually accessed  
 17 that FTP site?  
 18 A. No, I didn't actually access the FTP site. I originally  
 19 said I couldn't and how could I do it, and I think he  
 20 must have sent me the same link, but I don't remember  
 21 receiving that.  
 22 Q. Do you remember going back to Studio E and saying "Well,  
 23 I can't access the link, but can I have the drawings  
 24 another way?"  
 25 A. No, I know, because that email there says, "We're having

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1 a few email problems", I'm assuming that that was the  
 2 reason that we decided to do it by way of a workshop  
 3 rather than by looking at drawings, but that's only my  
 4 assumption.  
 5 Q. Yeah.  
 6 A. I didn't access the FTP site anyway.  
 7 Q. Wouldn't you have been keen to have seen the drawings  
 8 that they had available on the FTP site, particularly  
 9 given you didn't have information about the overcladding  
 10 at this stage?  
 11 A. Overcladding isn't mentioned anywhere in this  
 12 correspondence.  
 13 Q. No, I --  
 14 A. I'm assuming this was to do with floor layouts.  
 15 Q. I see.  
 16 Just to be clear, Mr Ashton, we haven't been able to  
 17 work out exactly what was on that FTP site.  
 18 A. No.  
 19 Q. That doesn't seem to be information we can gather --  
 20 A. No.  
 21 Q. -- at this length of time afterwards.  
 22 I want to ask you a little bit about liaison with  
 23 RBKC Building Control, because that takes place in late  
 24 2012.  
 25 If we can go to {ART00000385}, this is an email that

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1 Mr Sounes sent to David Hale of Appleyards and others on  
 2 13 September 2012.  
 3 Now, you're not copied in to this, just to be clear.  
 4 So this is after you have delivered your design note but  
 5 before issue 1 of your outline strategy.  
 6 A. Right.  
 7 Q. In the last two sentences of this email, it says in that  
 8 last paragraph:  
 9 "We have identified a £200k saving against the just  
 10 on the measure to the elevations. Terry didn't identify  
 11 any fundamental problems with the fire strategy but  
 12 liaison with Building Control is essential because, as  
 13 he put it, RBKC set their own standards. Exova outline  
 14 strategy attached."  
 15 Now, I just want to ask you -- I know you're not  
 16 copied in to this email -- what Mr Sounes might have  
 17 meant there by reference to your comment that "RBKC set  
 18 their own standards"; was that something you said to  
 19 him?  
 20 A. No, not in those terms. I mean, I don't think that RBKC  
 21 would ask for anything that the Building Regulations  
 22 guidance documents gave them their entitlement to. That  
 23 was a bit clumsily worded. But, no, they don't have  
 24 their own rules --  
 25 Q. No.

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1 A. -- if that's what he's implying.  
 2 Q. So you don't know what he's referring to here?  
 3 A. I believe he is misreporting what I said.  
 4 Q. Can you remember what you said to him about  
 5 Building Control?  
 6 A. No. I think I have said before, and I'll say it again  
 7 now, that during the discussions with Studio E, I did  
 8 point out that RBKC Building Control were a little  
 9 difficult to deal with, but that was it. That isn't  
 10 saying that they have a different set of rules to the  
 11 rest of the country.  
 12 Q. What did you mean by that, a little difficult to deal  
 13 with?  
 14 A. They are -- they were at the time difficult to deal  
 15 with, particularly where you were providing something  
 16 which was not completely code compliant.  
 17 Q. I see. So they were sticklers for compliance, were  
 18 they, is that what you mean?  
 19 A. I think that's a fair description of them, yes.  
 20 Q. Yes.  
 21 Now, you wrote personally to John Allen at RBKC  
 22 Building Control attaching the first issue of your  
 23 outline fire strategy on 31 October 2012 itself. Let's  
 24 look at that. That's at {SEA00006443}. We see there  
 25 your email to him, from Terry Ashton to John Allen at

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1 RBKC, ccing in Studio E, "John, further to my email,  
 2 please see attached our report."  
 3 Can you explain why you sent that version of the  
 4 fire strategy, issue 1, directly to RBKC Building  
 5 Control, but you don't appear to have done that for the  
 6 two later revisions of the fire strategy in 2013?  
 7 A. No, I can't. I mean, I'm assuming that they would have  
 8 been sent by the design team as distinct from me  
 9 personally.  
 10 Q. Then we can see from the documents that on  
 11 6 November 2012, you organised a meeting at Kensington  
 12 Town Hall with Adrian Jess of Studio E and John Allen  
 13 and Dave Gammon of RBKC Building Control; is that  
 14 correct?  
 15 A. Yes, that's correct.  
 16 Q. Can you recall, what was the purpose of that meeting?  
 17 A. It was to introduce the scheme to them, and gauge their  
 18 feelings about it.  
 19 Q. So was it to discuss the fire strategy report that you  
 20 had prepared?  
 21 A. That could have been the agenda for the meeting, yes.  
 22 It was purely to discuss fire strategy.  
 23 Q. Yes.  
 24 Now, your notes of this meeting are at  
 25 {EX000001371}, if we can go to this. We can see it says

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1 "Purpose of meeting", at the bottom of that page, "To  
2 discuss fire strategy report"; do you see that?  
3 A. Indeed.  
4 Q. Then if we look at page 2 {EX000001371/2}. We don't  
5 need to look at the detail, let's just look at the  
6 headings. We can see you are discussing firefighting  
7 access, so that's B5.  
8 A. Yeah.  
9 Q. Firefighting means of escape, so that's B5, possibly B1.  
10 Then if we go on to page 3 {EX000001371/3}, we've  
11 got means of escape, details required, and then  
12 consultation with the fire authority. So we see all  
13 those topics.  
14 A. Yes, I do.  
15 Q. Yes.  
16 Adrian Jess also made notes following that meeting.  
17 Can we just look at those briefly as well. This is at  
18 {SEA00006526}. He wrote his notes up in an email, and  
19 this was sent to you on 7 November 2012. Again, I think  
20 it suffices to look at the bold headings. So he said:  
21 "Please find below my notes ..."  
22 In the bold headings we have firefighting, and then  
23 he is dealing with that on various aspects of the tower,  
24 then he begins smoke ventilation, and if we can go over  
25 to the next page {SEA00006526/2}, there are a number of

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1 points about smoke ventilation. Then we have got means  
2 of escape, detection and containment. Do you see that?  
3 A. I do.  
4 Q. Then if we keep going, that's the last item. Do you see  
5 that?  
6 A. Yeah.  
7 Q. Based on these two sets of notes, it appears that at  
8 this meeting there was no reference to requirement B4  
9 and the external overcladding of the tower; is that  
10 correct?  
11 A. That's correct.  
12 Q. Can you explain why that was, given you knew it was  
13 going to be part of the refurbishment scheme?  
14 A. Well, it wasn't discussed because we were discussing  
15 their response to our report. If cladding had been  
16 an issue to be discussed, then I would have expected  
17 Studio E to say, "Can we put an item in the agenda on  
18 cladding", but they didn't.  
19 Q. Wasn't that something you should have picked up on?  
20 A. Not necessarily. I mean, at that stage I didn't really  
21 know what they were doing with the cladding.  
22 Q. But wasn't that an opportunity to say, perhaps before  
23 the meeting, just to Studio E and to the TMO, "I still  
24 haven't got enough details, I don't think I've seen  
25 enough on the cladding, this is an important part of the

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1 Building Control approval process and B4, we need to  
2 sort this out"? Wasn't that something you should have  
3 done?  
4 A. It was something I think that Studio E could have done  
5 themselves. They could have said, "Can we start talking  
6 about cladding, can we introduce the topic with  
7 Building Control", but they didn't see fit to.  
8 Q. I see.

9 Is it right that because you haven't mentioned the  
10 overcladding in your issue 1 of the fire strategy, when  
11 it comes to this important meeting with  
12 Building Control, it's simply not discussed?

13 A. Correct. Well, I'm not saying it wasn't discussed  
14 because I hadn't mentioned it in my report. We went  
15 there to talk about means of escape and firefighting  
16 access generally. But Dave Gammon had already looked at  
17 the report and had given a sort of verbal response to it  
18 at the meeting, so we were looking at his notes that  
19 responded to ours.

20 Q. I see. But how would Dave Gammon know that overcladding  
21 was part of the scheme? It's not mentioned in your  
22 report.

23 A. No. Maybe he didn't know.

24 Q. And you didn't think to check that Building Control knew  
25 that?

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1 A. No.  
2 Q. By this point, we know you have had the Studio E stage C  
3 report, but I think it follows from your earlier answers  
4 that you wouldn't have looked at that --

5 A. No.

6 Q. -- prior to this meeting.

7 A. No.

8 Q. At the date of this meeting, did you know about the  
9 proposed use of PIR insulation?

10 A. No. PIR insulation where, sorry?

11 Q. As part of the overcladding. Underneath the rainscreen  
12 as part of the overcladding.

13 A. No. Absolutely not.

14 Q. Can we go to Mr Sounes' witness statement. This is at  
15 {SEA00014273/72}.

16 Perhaps I can just ask, because these are long  
17 paragraphs, can you just read those two paragraphs to  
18 yourself for a moment.

(Pause)

20 A. Well, I suggest to you that, at the end of 146, that  
21 Building Control did not express any concerns about the  
22 cladding or the Celotex, that they hadn't been told  
23 about it.

24 Q. Right.

25 Can you see why Mr Sounes might have thought,

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1 looking at the notes, that Building Control just simply  
 2 didn't express any concern about the proposed cladding  
 3 at that meeting?  
 4 A. I'm not quite sure why he assumed that when it wasn't  
 5 tabled with the Building Control authority.  
 6 Q. I see.  
 7 A. It's an assumption on his part that it was.  
 8 Q. Just to be clear, can you explain: why wasn't the  
 9 cladding significant enough to add it to the agenda with  
 10 Building Control so you could discuss their views on it?  
 11 A. Well, because we hadn't looked at any cladding at that  
 12 stage.  
 13 Q. And wasn't it your responsibility in leading the meeting  
 14 to at least include reference to the cladding so as to  
 15 cover all areas of fire safety?  
 16 A. No, not necessarily.  
 17 Q. Okay.  
 18 I'm now going to come to a different topic here, and  
 19 it will be obvious why this is relevant in a moment.  
 20 I want to ask you about your awareness at this  
 21 time -- this is 2012 and 2013 -- of the risks posed by  
 22 combustible materials in external wall systems. Okay?  
 23 We're going to look in due course at issues 2 and 3 of  
 24 the outline strategy.  
 25 First of all, can you tell us what, if any, training

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1 or study had you undertaken into the hazards of  
 2 rainscreen cladding systems or other building façades  
 3 containing combustible materials as at 2013?  
 4 A. We didn't have any specific training on that aspect of  
 5 building design. I mean, obviously, as a fire  
 6 consultancy, we were aware of a number of serious fires  
 7 that had occurred worldwide because of the use of  
 8 inappropriate materials on buildings, and some in the  
 9 UK, where plastic soffits had caught fire and caused  
 10 fire spread. There was the obvious case of  
 11 Lakanal House.  
 12 Q. Yes.  
 13 A. And I've seen examples myself of where you have had  
 14 external fire spread where there has been no combustible  
 15 material applied to the façade, but where fire has been  
 16 channelled up the building by the building  
 17 configuration, which forms a sort of chimney, albeit in  
 18 reinforced concrete.  
 19 So, yes, I was well aware of the potential for  
 20 external fire spread.  
 21 Q. Given that potential, wasn't that something that you  
 22 were keen to have, some formal training or other  
 23 professional courses about external fire spread and  
 24 combustible materials on tall buildings, as part of your  
 25 work as a fire safety consultant?

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1 A. As part of our work as fire safety consultants, we were  
 2 expected to know what the standards were and what should  
 3 and shouldn't be used on external wall construction, or  
 4 on roofs for that matter.  
 5 Q. Was it as simple as that in terms of what should and  
 6 shouldn't be used? Isn't it actually quite a complex  
 7 topic, this, in terms of external fire spread and use of  
 8 combustible materials and how it might spread and why?  
 9 A. I don't think it's any more complicated than any other  
 10 aspect of building construction. I mean, you get  
 11 buildings where there's considerable internal  
 12 fire spread via voids and shafts and what have you.  
 13 I wouldn't have highlighted external cladding as the  
 14 most important issue covered by the  
 15 Building Regulations, if that's what you're asking.  
 16 Q. No, I'm not saying it was the most important issue, but  
 17 I'm saying it was, particularly with a high-rise and  
 18 an overcladding project, an important issue.  
 19 A. It was an important issue, I agree with you on that.  
 20 Q. Did Exova encourage its fire safety team members to  
 21 undertake continuing professional development courses  
 22 relevant to their work?  
 23 A. It did and it does.  
 24 Q. Did you undertake any such CPD while --  
 25 A. I didn't -- not on that specific issue.

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1 Q. How did you keep up-to-date with relevant developments  
 2 or changes to relevant guidance in that area, then, if  
 3 you didn't --  
 4 A. Well, we had regular meetings attended by all members of  
 5 staff where new codes of practice were discussed and  
 6 explained. That was the forum for doing that. And at  
 7 the time that Approved Document B was produced, and that  
 8 goes back a long while, we did attend public  
 9 presentations conducted by the then DoE.  
 10 Q. I think you have said that you were aware of a number of  
 11 international and domestic fires. Were you aware of  
 12 a spate of fires in high-rise buildings in the UAE, in  
 13 the United Arab Emirates?  
 14 A. I was, yes.  
 15 Q. What did that tell you in terms of your work? What  
 16 messages did you take from that, that there had been  
 17 these high-rise fires in combustible cladding?  
 18 A. That combustible cladding shouldn't be used on high-rise  
 19 buildings.  
 20 Q. Were you aware that projects involving composite metal  
 21 materials and external insulation required heightened  
 22 vigilance, given the risks that are posed in the use of  
 23 such materials?  
 24 A. No, I wasn't. I've not encountered the term. Composite  
 25 metal ...?

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1 Q. Materials.  
 2 A. Materials.  
 3 Q. So composite metal products, so something that's not  
 4 just purely aluminium or purely zinc, but has  
 5 a different core, a polymeric core. Were you aware?  
 6 A. No, I wasn't aware at the time, no.  
 7 Q. Were you aware that guidance was produced by the BRE  
 8 concerning the hazards posed by exterior wall cladding  
 9 systems in 1998, 2003 and 2013?  
 10 A. I was aware of BR 135 and I was aware that they had  
 11 developed large-scale tests to test assemblies that ...  
 12 to ensure that there wasn't fire spread up the face of  
 13 a building.  
 14 Q. Had you actually read BR 135 yourself?  
 15 A. Not from cover to cover, no.  
 16 Q. Did you think to read it when you started work on the  
 17 Grenfell project, given you hadn't done an overcladding  
 18 high-rise before?  
 19 A. No, I didn't. No.  
 20 Q. Were you aware that it contained extensive warnings as  
 21 well as guidance on the fire risks associated with  
 22 cladding systems?  
 23 A. Yes, I was.  
 24 Q. And were you aware that it drew attention to the  
 25 possibility of rapid fire spread in external cladding

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1 systems?  
 2 A. Yes, I was aware of that, particularly if you used the  
 3 wrong materials.  
 4 Q. Were you aware that it drew attention to the problems  
 5 with cavities within such systems, for example leading  
 6 to flame extension of five to ten times?  
 7 A. Yes, I was.  
 8 Q. Were you aware that the potential existed for the fire  
 9 to affect multiple storeys simultaneously, thus making  
 10 firefighting more difficult?  
 11 A. Yes, I was aware of that. I mean, I think one of the  
 12 reasons why the rules change once you get above a height  
 13 of 18 metres is that a fire can't be fought using  
 14 an external firefighting appliance, so that the rules  
 15 for high-rise buildings or buildings over 18 metres are  
 16 necessarily more strict.  
 17 Q. Were you aware that a new edition of BR 135 came out in  
 18 2013?  
 19 A. Not specifically, no.  
 20 Q. So you wouldn't --  
 21 A. It covered the same ground, I would imagine, as the  
 22 earlier one, it was maybe just brought up to date as  
 23 a lot of these publications are.  
 24 Q. Can we go to that. Let's look at the 2013 version.  
 25 This is the third edition. It's at {CEL00003364}. So

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1 this is the third edition by Sarah Colwell and  
 2 Tony Baker.  
 3 A. Right.  
 4 Q. So I think you have just said you didn't read it during  
 5 the time you were working on the Grenfell project. Have  
 6 you ever read this guidance?  
 7 A. Not in detail. I am aware of the document's existence.  
 8 Q. Can we look at a few points in this guidance. Can we go  
 9 to page 11 {CEL00003364/11} within it. On the left-hand  
 10 side, we've got a column beginning "2.1  
 11 Building Regulations".  
 12 A. Yeah.  
 13 Q. In the third paragraph of that, I'm just going to read  
 14 this out to you:  
 15 "These potentially conflicting requirements are  
 16 highlighted in the area of innovative materials and  
 17 designs, which are being driven by the need to construct  
 18 more energy-efficient and sustainable buildings. In  
 19 order to meet these design challenges, the range of new  
 20 and innovative materials and designs of systems being  
 21 offered as potential solutions has also increased the  
 22 volumes of potentially combustible materials being used  
 23 in external cladding applications. In addition, these  
 24 external wall cladding systems, while still widely used  
 25 for refurbishment applications on masonry structures,

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1 are increasingly being applied to new-build scenarios  
 2 utilising lightweight framing solutions for the wall  
 3 system."  
 4 Do you see that?  
 5 A. I do, yes.  
 6 Q. Just to ask you about the themes that that's  
 7 highlighting, were you aware generally of this drive to  
 8 construct more energy efficient, sustainable buildings?  
 9 A. Absolutely. We used to comment on it and say that it  
 10 tended to persuade people to use things like foamed  
 11 plastics, rather than mineral wool, which is an inert  
 12 material.  
 13 Q. So you were aware, therefore, that that had the  
 14 potential to increase the volumes of potentially  
 15 combustible materials being used in external cladding  
 16 applications?  
 17 A. Absolutely, yes.  
 18 Q. You're aware of those trends?  
 19 A. Yes.  
 20 Q. Then perhaps I can pick up just a few other parts of  
 21 this. If you look at page 19 {CEL00003364/19}, I want  
 22 to look at 6.3.2, "Fire barriers", in the right-hand  
 23 column.  
 24 A. Right. Yeah.  
 25 Q. If we read that:

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1 "If fire enters a void in the system, whether that  
2 void is created by a fire or is part of an existing  
3 design, and the insulation is exposed to the fire  
4 source, any combustible material present may become  
5 involved, and there is potential for the fire to  
6 propagate throughout the system if adequate fire  
7 barriers are not installed."

8 Do you see that there?

9 A. I do, yes.

10 Q. Just picking up on that, were you aware of the  
11 importance of ensuring that adequate fire barriers were  
12 installed?

13 A. Yes, I was.

14 Q. Given that the combustible material present around it  
15 may otherwise cause fire propagation?

16 A. Yes, I was aware.

17 Q. Then on page 22 [CEL00003364/22], if we can look at 6.4,  
18 and I want to focus on the second paragraph under  
19 "Ventilated cavity systems", do you see there it says:

20 "If the fire is able to enter the cavity, it may  
21 propagate unseen through the system if adequate fire  
22 barriers are not employed. This may result in  
23 significant risk of system collapse, or in the fire  
24 breaking out at significant distances from its origin."

25 Do you see that?

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1 A. I do.

2 Q. Again, was that something you were aware of?

3 A. Oh, yes.

4 Q. Then at 6.4.1, further down the same page on the bottom  
5 left, "Performance of materials in fire", we've got  
6 "Insulation":

7 "As it can be difficult to prevent fire entering the  
8 cavity and spreading in these systems, the selection of  
9 the insulation materials used and the design of the fire  
10 barriers to close these cavities are particularly  
11 important."

12 Do you see that?

13 A. I do, yes.

14 Q. Again, were you aware of the particular importance of  
15 the selection of materials as outlined there?

16 A. Yes, yeah.

17 Q. If you were aware of that, why wasn't that something you  
18 were highlighting to the design team on the Grenfell  
19 project?

20 A. I think I said earlier that we didn't have any  
21 discussion with them about the cladding and the  
22 insulation. Had those discussions taken place, then we  
23 would have been able to give them the appropriate  
24 advice.

25 Q. But given that, for example, this important guidance is

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1 talking about the importance of the selection of the  
2 insulation materials to be used, why wasn't that  
3 something that you had a laser-like focus on at the time  
4 of working with the design team and preparing these  
5 fire strategies?

6 A. I'm not sure I can say that I had a laser-like focus  
7 about anything. I mean, the thing is that we were  
8 looking at the building alterations. I was aware that  
9 there were proposals to overclad the building, but  
10 because we didn't discuss this, I didn't see fit to say  
11 to the design team, "We need to have a discussion about  
12 what you're doing with the overcladding".

13 Now, maybe I should have said that, but it didn't  
14 come from them, they didn't say, "We would like to talk  
15 to you about what we're doing with the overcladding".  
16 I assumed that that would happen at some point in the  
17 future.

18 Q. But given you were the fire experts, Exova have this  
19 international reputation and you have explained in the  
20 fee proposal you're going to have access to real experts  
21 in this area, wasn't that your responsibility to raise  
22 with Studio E?

23 A. I don't see it that way. I mean, for all I knew, they  
24 could have been providing something using mineral wool  
25 with steel outer cladding, but they didn't tell me what

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1 they were doing.

2 Q. Let's just look at, before we leave this, a couple more  
3 passages within this.

4 So within section 6.4.1, on the right-hand column,  
5 under the heading "External panels and finishes".

6 A. Right.

7 Q. There we go. So you can see in the right-hand column  
8 there's a heading there, "External panels and finishes",  
9 and at the end of the second paragraph there is talk --  
10 I'm going to pick it up where it says in the middle:

11 "There is a potential risk of injury to people or  
12 damage to property if spalling material is expelled from  
13 the system during a fire. The panels may also generate  
14 large pieces of falling debris if the integrity of the  
15 fixings to the railing system is lost during the fire."

16 Then it says this:

17 "Metal panels may fall from the system if the  
18 strength of the fixings is affected by the local fire  
19 source. They may also melt, generating molten metal  
20 debris if exposed directly to the sustained flame  
21 envelope or other combustible materials in the system."

22 Do you see that?

23 A. I do, yes.

24 Q. Was that something that you were aware of, the  
25 propensity of metal panels to melt and generate molten

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1 debris if exposed to an external fire?  
 2 A. I was aware that there are certain materials you  
 3 shouldn't use as cladding on an external face of  
 4 a building. GRP, for example, would melt and fall off.  
 5 Metal panels used as cladding might fall off the  
 6 building if the fixings were inadequate. Metal panels  
 7 wouldn't actually melt, because they're non-combustible.  
 8 Q. I see.  
 9 Then that last paragraph there, it says:  
 10 "Combustible panels are typically based on vinyl or  
 11 glass reinforced plastic, although various new products  
 12 are being developed in this area, some of which also  
 13 contain insulation materials."  
 14 Do you see that?  
 15 A. I do, yes.  
 16 Q. Is that something that you were aware of, that new  
 17 products were being developed in this area, some of  
 18 which contained insulation materials?  
 19 A. I wasn't aware that it was being used widely. I mean,  
 20 I was aware that there were laminated panels that were  
 21 used as decorative fascias, but I had never seen  
 22 a proposal to use them as the complete façade of  
 23 a building.  
 24 Q. But if you had read this guidance, it would have alerted  
 25 you to that, wouldn't it?

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1 A. It would have done, yes.  
 2 Q. Then it says:  
 3 "These products generally have good surface spread  
 4 of flame characteristics to prevent rapid fire spread  
 5 across the surface of the system, but once the panels  
 6 become involved in the fire, they have the potential to  
 7 generate falling debris, add to the overall fire load,  
 8 and provide a route for fire to propagate up the outside  
 9 of the building."  
 10 Do you see that?  
 11 A. Yes, I do.  
 12 Q. Again, was that something you were aware of at the time?  
 13 A. I was aware in general terms that materials which have  
 14 a good performance when the surface is applied to  
 15 a flame would pass a test, but wouldn't necessarily be  
 16 satisfactory where the whole assembly was in a fully  
 17 developed fire. In other words, a class 0 material is  
 18 really only a material which has fairly minimal  
 19 resistance to fire propagation and external fire spread,  
 20 but it isn't necessarily by definition one that won't  
 21 burn.  
 22 Q. Thank you, Mr Ashton. We will come back to that topic  
 23 when we look at some of the emails that were exchanged  
 24 in 2014 between you and the design team.  
 25 A. Okay.

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1 Q. Just sticking with the guidance that was available about  
 2 external fire spread.  
 3 I just want to check: were you aware in 2013 that  
 4 Approved Document B itself also expressly warned in  
 5 section 12.5 that the use of combustible materials in  
 6 the cladding system and extensive cavities may present  
 7 a risk to health and safety in tall buildings?  
 8 A. Yes. Yes, I was aware of that.  
 9 Q. Were you aware at this time of a report from  
 10 Exova Warringtonfire in Australia on Fire Safety  
 11 Engineering: Design of Combustible Façades that was  
 12 dated December 2011?  
 13 A. No, I've not encountered that document.  
 14 Q. Were you aware that that warned that a combustible  
 15 external façade may ignite from flames venting from  
 16 a compartment fire and lead to a self-propagating  
 17 fire spread?  
 18 A. No, but I think that's what would happen where you use  
 19 combustible materials on the façade of a building.  
 20 Q. I now want to ask you a little more about the different  
 21 kinds of cladding panels that you had an awareness of at  
 22 this time.  
 23 I think you said before that you weren't really  
 24 aware of composite metal panels; is that right?  
 25 A. I had not encountered them, no.

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1 Q. So had you encountered any composite panels with a PE,  
 2 polyethylene, core?  
 3 A. One particular product, which, as I said, was used on  
 4 a very small scale, you know, as façades on garages,  
 5 that sort of thing. But I didn't envisage that that  
 6 sort of material would be used to clad a high-rise  
 7 building.  
 8 Q. No.  
 9 A. Or even a medium-rise building for that matter.  
 10 Q. What did you know about polyethylene at this time?  
 11 A. Polyethylene is a combustible material.  
 12 Q. Yes. And you --  
 13 A. Which is why I would, you know, caution people who think  
 14 that class 0 is all that is required.  
 15 Now, the Building Regulations interestingly say that  
 16 the external surfaces of buildings could be class 0, but  
 17 had I been aware of the precise proposals for this  
 18 building, I would have sought guidance not only from my  
 19 colleagues, but also from our testing department, who  
 20 have a much better feel for these things.  
 21 Q. I see. And when you say, "Had I been aware of the  
 22 precise proposals for this building", what kind of  
 23 information are you talking about there? The specific  
 24 panels, the specific insulation that was to be used?  
 25 A. Absolutely.

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1 Q. Yes. Did you understand that PE is highly combustible?  
 2 A. Yes, I do.  
 3 Q. Did you understand at the time that, if there were  
 4 panels containing that material, it could exacerbate the  
 5 flame spread over the external wall?  
 6 A. I think I would have been subconsciously aware of that,  
 7 but I didn't know that they were doing that.  
 8 Q. Were you aware at this time that cladding panels were  
 9 available with a fire retardant, FR, core which could be  
 10 expected to perform better in a fire than panels with,  
 11 for example, a polymeric PE core?  
 12 A. Yeah, I mean, I am aware that there are a number of  
 13 products which are fire retardant, but they only have  
 14 an initial effect in terms of fire. If they become  
 15 involved in a fully developed fire, they will burn.  
 16 Q. Yes.  
 17 A. I mean, there was a lot of work done with cold stores  
 18 and factories producing fast food. You know, a lot of  
 19 these buildings were made from metal panels with  
 20 combustible cores, and whilst they didn't result in too  
 21 many fatalities, there were one or two, tragically.  
 22 The biggest problem was firefighting access because  
 23 the product burned and produced such dense and toxic  
 24 smoke that the fire service couldn't tackle it. The  
 25 secondary problem with that is with the run-off from

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1 these toxic materials into the environment.  
 2 So I was aware that plastics were not a good  
 3 building material from the fire point of view.  
 4 Q. Yes, those were kind of polystyrene or --  
 5 A. Polystyrene, polyurethane, polyethylene, almost all of  
 6 them.  
 7 Q. I think it must follow from your answers, but I want to  
 8 ask you this nevertheless: were you aware that ACM  
 9 panels were ordinarily installed on a building in either  
 10 a riveted or a cassette form?  
 11 A. No, I wasn't aware of that.  
 12 Q. So you weren't aware of any differences in fire  
 13 performance between rivets and cassettes?  
 14 A. No, I have never looked at the product.  
 15 Q. If you go to your witness statement now, this is at  
 16 paragraph 3.6, your first witness statement,  
 17 {EX000001621/3}.  
 18 A. Right.  
 19 Q. You are talking about fire strategy advice here:  
 20 "For a proposed building, this normally involves  
 21 advising on the type of measures which need to be  
 22 adopted - for example, doors with a particular level of  
 23 fire resistance, or smoke detectors of a particular  
 24 standard - rather than on using a specific product (such  
 25 as a particular manufacturer or system). We can be

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1 asked to advise on whether a specific product would be  
 2 satisfactory, and would give that advice on the basis of  
 3 test evidence and/or product certification, but this is  
 4 not normally part of fire strategy advice, and was not  
 5 something we were asked to do for Grenfell."  
 6 Do you see that there?  
 7 A. Yes, I do.  
 8 Q. Would you agree that, in the case of building works  
 9 involving overcladding using a rainscreen system with  
 10 insulation, it would be essential for a fire strategy  
 11 consultant to consider the flammability of the  
 12 particular type of panel to be used?  
 13 A. If he or she knew what it was.  
 14 Q. I see. So we're back to: if you are told what it was,  
 15 you can advise --  
 16 A. Yeah, exactly.  
 17 Q. -- but if you're not, you don't.  
 18 A. No, that's right.  
 19 Q. Would you agree with me, though, that it would be  
 20 essential to know the particular type of panel or  
 21 particular type of insulation to advise on the fire  
 22 hazards proposed by that and its compliance with the  
 23 Building Regulations?  
 24 A. Yes, I think that is essential, that you have that  
 25 knowledge, provided you're told what materials are being

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1 used.  
 2 Q. Would you also agree that without taking account of the  
 3 particular type of panel or insulation to be used,  
 4 a fire strategy consultant couldn't identify the main  
 5 fire safety issues for the project?  
 6 A. Not as written, it didn't, no, I agree with that.  
 7 I mean, if we had been given a presentation showing what  
 8 was proposed, then we would have been able to have  
 9 assessed that. Not necessarily on our own; we may well  
 10 have talked to our testing and certification department  
 11 to see what the fire properties of what was proposed  
 12 were. But we weren't given that information. I think  
 13 that's the crux of this, that we were not told what was  
 14 being done.  
 15 Q. Can we look at paragraph 3.4 on that same page of your  
 16 witness statement, a bit further up.  
 17 A. Yeah.  
 18 Q. In that paragraph you explain that work on  
 19 a fire strategy can involve highly technical analysis,  
 20 and in the sixth line you say -- picking it up four  
 21 lines down:  
 22 "... it can involve highly technical analysis: for  
 23 example, on the performance characteristics of a smoke  
 24 ventilation system, or the likely behaviour of  
 25 particular materials in a fire. Where our involvement

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1 in a project calls for that sort of work, it would be  
2 handled by other colleagues, with relevant engineering  
3 qualifications and expertise: though our work on  
4 Grenfell Tower did not call for that level of advice."

5 Now, just breaking that down, does that mean that  
6 you yourself didn't have the expertise or the  
7 qualifications to be able to advise on the likely  
8 behaviour of particular materials in a fire?

9 A. No, I didn't have the expertise to deal with fire  
10 engineering analyses, but we did have suitably qualified  
11 colleagues who would be able to do that. And I said  
12 already with regard to the fire performance of materials  
13 that if I wasn't sure, I would be able to call on our  
14 testing and assessment colleagues in Warrington.

15 Q. So just looking at the words you have used there, you  
16 have singled out "or the likely behaviour of particular  
17 materials in a fire". Are you saying that what you have  
18 written here isn't right; that actually where that was  
19 necessary, it wouldn't necessarily be handled by other  
20 colleagues, it might be handled by you, depending on --

21 A. If I can put this another way. If somebody said, "We  
22 need to do a CFD analysis on the smoke movement in the  
23 lobbies of the stairs of this building", I would rely on  
24 a colleague with the appropriate technical  
25 qualifications to do that.

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1 If somebody then said to me, "We are proposing to  
2 use X and Y to line the façade of the building", I would  
3 make a judgement based on what I knew, and if I wasn't  
4 sure, then I would ask for test evidence and/or get  
5 advice from the people that do fire testing on a daily  
6 basis.

7 Q. What checks would you do to work out whether you could  
8 be sure or not? What considerations would you bear in  
9 mind about whether you could advise on that or whether  
10 you needed to refer it to colleagues?

11 A. I would suggest that anything that had plastic in it,  
12 unless there was a straightforward fire test certificate  
13 to back up its use in the given situation, such as  
14 an 8414 test -- and there are products which have passed  
15 that which are not non-combustible -- then I would need  
16 to get further advice.

17 Q. What about a new type of insulation that's come on the  
18 market?

19 A. Then we would have to discuss it with our testing  
20 colleagues.

21 I mean, basically -- and this might sound  
22 simplistic, but if a building material is inert, it  
23 won't burn. If it isn't inert, it will burn, and the  
24 degree of burning or the degree of severity of burning  
25 will be subject to what its chemical composition is, and

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1 some plastics will perform better than others.

2 For example, there are plastic-type insulation materials  
3 used as insulation in external wall construction which  
4 have passed the BS 8414 large-scale test and which  
5 therefore satisfy BR 135, but they're few and far  
6 between.

7 Q. I am interested as well to explore why you say in those  
8 last two lines, "though our work on the Grenfell Tower  
9 did not call for that level of advice". Didn't it call  
10 for precisely that level of advice?

11 A. It didn't call for any fire engineering techniques, the  
12 work that we did on Grenfell Tower. We did offer them.  
13 This is written after the fire, this statement. We  
14 weren't asked to do the CFD analysis to demonstrate that  
15 the smoke extract system in the tower was adequate. We  
16 did offer it but they didn't take us up on that.

17 Q. But focusing on the likely behaviour of particular  
18 materials in a fire, why wasn't that --

19 A. Well, that's a statement of fact. We weren't told what  
20 they were using.

21 Q. We have looked at the stage C report and we can see that  
22 the insulation was specified, FR5000.

23 A. Yeah.

24 Q. Had you been told that, are you saying you could have  
25 advised on it?

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1 A. If I had been told that they were using Celotex, I would  
2 have said that that is not acceptable without test  
3 evidence that it is suitable for use on that building.

4 Q. Okay. Well, we'll come and look back at this topic when  
5 we look at some emails exchanged in 2014.

6 A. Okay.

7 Q. I now want to look at the Studio E stage D report. So  
8 we saw in that earlier email that we looked at when they  
9 were setting up the Building Control meeting that  
10 Studio E were talking about getting a draft of their  
11 stage D report ready. It sounds like an obvious  
12 question, but presumably you anticipated Studio E would  
13 be doing a stage D report on this project?

14 A. Well, yes, I assume that would have taken place.

15 Q. Now, on 20 August 2013, Studio E issued their RIBA  
16 stage D report. If we can look at that, that's at  
17 {MAX00000757}. If we go to the contents page on page 3  
18 {MAX00000757/3}, the Exova first issue outline  
19 fire safety report was included at appendix D. Can you  
20 see that at the bottom?

21 A. Yes, I can.

22 Q. It says, "Fire Safety Report", and we can see when we  
23 look further within the report that that was issue 1,  
24 the 31 October 2012 report, that Studio E included,  
25 because that was the most up-to-date information they

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1 had from you at that stage.  
 2 A. Yes, that's right.  
 3 Q. We can see that Exova were listed as being the fire  
 4 engineer on the design team on page 4 {MAX00000757/4} in  
 5 the right-hand column, if we can go to that. You are  
 6 there, second bracket down.  
 7 A. Yes. Yeah.  
 8 Q. Were you aware at the time that Exova's first outline  
 9 strategy report from October 2012 was included in the  
 10 stage D report?  
 11 A. No, I wasn't.  
 12 Q. Just for the record, that appears at page 78  
 13 {MAX00000757/78}.  
 14 So had Studio E asked Exova or spoken to Exova about  
 15 the fact they were going to include that report?  
 16 A. No. No, they didn't.  
 17 Q. Did you ever read or review the stage D report?  
 18 A. No.  
 19 Q. Now, again, in fairness to you, we can't see you being  
 20 sent this or a link to this, unlike with the stage C  
 21 report. But I want to know why, if you knew a stage D  
 22 report would be produced by Studio E, didn't you ask for  
 23 it?  
 24 A. I wouldn't normally ask for it. The same comment with  
 25 regard to the stage C applies, really. If the architect

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1 felt they wanted some guidance on what they had put in  
 2 the stage D report, then I would have expected them to  
 3 say, "Can you please look at that and tell us what you  
 4 think".  
 5 Q. But weren't you keen to see their stage D report at some  
 6 point in 2013, given you knew you hadn't yet advised in  
 7 detail on the cladding?  
 8 A. I'm sorry, you didn't -- you said earlier they didn't  
 9 even send a link to me.  
 10 Q. Agreed. We can't see that they did.  
 11 A. They obviously didn't want my comments on the report,  
 12 from what you're saying.  
 13 Q. But I'm asking you why that wasn't a piece of  
 14 information, a piece of important information on the  
 15 project, that you yourself would be asking for if you  
 16 haven't seen it?  
 17 A. Well, I think I said earlier in our discussions that  
 18 I don't normally look at stage C or stage D reports  
 19 unless I'm specifically asked to do that.  
 20 Q. Okay.  
 21 I'm not going to take you through the detail of  
 22 this, but merely to note that there are references again  
 23 in this to zinc composite rainscreen panels, and also to  
 24 the proposed insulation, the Celotex FR5000. It's  
 25 named --

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1 A. Okay.  
 2 Q. -- as with the stage C report.  
 3 I now, therefore, want to look at issue 2 of the  
 4 outline fire safety strategy dated 24 October 2013. Can  
 5 we go to this. This is at {EXO00000430}. We can see  
 6 from the first page it's got a similar format, "Outline  
 7 Fire Safety Strategy", and this is issue 02 on the  
 8 bottom right, dated 24 October 2013; do you see that?  
 9 A. Yes, I think it's relevant to point out that we didn't  
 10 have much communication with Studio E for some time, and  
 11 that might explain why there is a gap between reports.  
 12 I mean, that's quite a large gap.  
 13 Q. Yes. Yes.  
 14 When you were preparing this report, and given that  
 15 you had broken your fee proposal down into the RIBA  
 16 stages, which RIBA stage was this one prepared for?  
 17 A. It could conceivably be in stage D at this stage, if you  
 18 will pardon the use of the word "stage" twice.  
 19 Q. But you didn't know at the time -- is that right -- that  
 20 Studio E had served their stage D report in August 2013?  
 21 A. No, I didn't, no.  
 22 Q. If we scroll down and look at page 2 {EXO00000430/2}, we  
 23 can see that this was prepared by you, Terry Ashton, and  
 24 then we can see it's reviewed by a different person this  
 25 time, this is by Tony Pearson, a senior consultant; do

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1 you see that?  
 2 A. Yes.  
 3 Q. It's Dr Pearson, isn't it? Is that right?  
 4 A. Yes, he is a doctor, yes.  
 5 Q. Was Dr Pearson senior to you?  
 6 A. No.  
 7 Q. He was junior to you?  
 8 A. He was junior to me.  
 9 Q. Then if we go to the introduction on page 4  
 10 {EXO00000430/4} -- again, this is familiar because it's  
 11 very similar to issue 1 -- you have set out in bullet  
 12 points here what the refurbishment comprises again. You  
 13 have updated the list to add the first bullet and the  
 14 third bullet, you have added a new stair providing  
 15 access to the boxing club and you have added office  
 16 accommodation in the mezzanine over the ground storey,  
 17 but reference to the cladding is still omitted. Why is  
 18 that?  
 19 A. For the same reason that I have given before, that we  
 20 hadn't actually at that point considered any details of  
 21 cladding.  
 22 Q. So even though you were provided with a link to the  
 23 Studio E stage C report back in October 2012, you had  
 24 not considered that report by this time?  
 25 A. No.

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1 Q. No.  
 2 A. No.  
 3 Q. But why didn't you, nevertheless, given you knew  
 4 overcladding would be included, add it to the list so  
 5 that anyone reading this report would know that the  
 6 proposed refurbishment comprised overcladding as well as  
 7 these items?  
 8 A. I could have added overcladding to the list. That would  
 9 have made it more comprehensive and reflect what we were  
 10 told originally. However, there is nothing in this  
 11 report that says anything about cladding. So I think  
 12 that you might imply from that that cladding isn't  
 13 an issue. But, as I said, cladding wasn't -- we hadn't  
 14 discussed cladding with them at all.  
 15 SIR MARTIN MOORE-BICK: No, but it might be thought,  
 16 Mr Ashton, that when you give a description of the  
 17 refurbishment, because you then set out what it  
 18 comprises, something as substantial as overcladding the  
 19 whole building perhaps ought to have been included.  
 20 A. Yes, I agree. Yes, it should have been.  
 21 SIR MARTIN MOORE-BICK: Thank you.  
 22 MS GRANGE: Now, you have got some drawings mentioned here  
 23 at the end of this section. You say the report is based  
 24 on discussions held with the design team, RBKC and on  
 25 fire access and fire strategy drawings, and you have

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1 given some numbers.  
 2 Now, we know that those were general arrangement  
 3 drawings, we have looked at those, and they don't show  
 4 any information about the cladding, just to be clear.  
 5 A. Correct.  
 6 Q. If we go to the B4 section, starting with that again, if  
 7 we look at page 8 {EX000000430/8}, we can see at  
 8 paragraph 3.1.4, what's said there is unchanged from the  
 9 first issue; is that right?  
 10 A. Correct, yes.  
 11 Q. You have said in your witness statement -- we don't need  
 12 to turn it up, I don't think -- at 4.15, that you had  
 13 still not received any information regarding any  
 14 proposals in relation to overcladding and therefore did  
 15 not make any change to this part of the report.  
 16 A. Yeah, that's correct.  
 17 Q. I put to you that it's simply not right that you had  
 18 received no information regarding the overcladding,  
 19 given you had received a link to the Studio E stage C  
 20 report which did have information about it in.  
 21 A. Yes, but as I've said earlier, I wasn't encouraged to  
 22 look at that, there was nothing from Studio E saying  
 23 would I please look at it and comment on its contents.  
 24 Q. Now, we know you have met with Studio E, you have met  
 25 with Building Control in the November 2012, and you have

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1 had an opportunity to see drawings. Didn't you have  
 2 enough information to offer at least some advice about  
 3 the external cladding at this stage?  
 4 A. I didn't have any information on the external cladding.  
 5 Q. Do you accept that the statement you have made here  
 6 remained potentially misleading because in fact you have  
 7 still not given consideration to the implications of the  
 8 refurbishment works to external fire spread?  
 9 A. Well, clearly Studio E thought that this gave them  
 10 carte blanche to do what they wanted in that regard, but  
 11 I'm not sure that anybody -- not everybody would take  
 12 that as being confirmation that everything that was  
 13 being done to the building was okay in terms of external  
 14 fire spread.  
 15 Q. Again, why not include a big caveat and say, "It's  
 16 a year on and I still haven't had the information  
 17 I need, that information would be X, Y and Z", or send  
 18 a separate email saying, "By the way, my B4 section is  
 19 unchanged, but that's because I don't have any proposed  
 20 details"? Why not do that?  
 21 A. Well, I didn't. I could have done, I guess.  
 22 Q. I want to put the point again to you, because I'm not  
 23 sure you actually answered it last time: wouldn't it  
 24 have been helpful for the design team to have at least  
 25 had the key requirements on B4, given we know they're

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1 going to overclad this building, you say you were aware  
 2 of the increased use of combustible materials? Wouldn't  
 3 it have been helpful for them to have had the basic  
 4 performance requirements set out in section 12?  
 5 A. Well, I think it would have been, yes. It's not  
 6 something we do routinely, but we didn't do it in this  
 7 particular case.  
 8 Q. Was there ever, on your part, as far as you're aware,  
 9 a kind of increasing awareness that you needed to start  
 10 flagging up external fire spread issues in these  
 11 fire strategies because of the increased use of  
 12 combustible materials?  
 13 A. Not specifically because of that. I was slightly  
 14 nonplussed that we hadn't actually discussed it in any  
 15 way, shape or form at this fairly late stage in design  
 16 development.  
 17 Q. So thinking back to -- you are still working as a fire  
 18 consultant. Was there ever a time when you were  
 19 thinking: actually, I need to be more proactive in  
 20 relation to external fire spread issues because I'm  
 21 aware that the use of new materials, new combustible  
 22 materials, is a significant risk?  
 23 A. Oh, I think there's a general awareness in the whole of  
 24 the building industry of the need to look critically at  
 25 construction of external walls following this particular

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1 fire .  
 2 Q. The Grenfell fire?  
 3 A. Yes, indeed.  
 4 Q. And does it follow from that that there wouldn't, in  
 5 your view, have been that awareness prior to the fire?  
 6 A. No, not as -- it wouldn't have been as prevalent then,  
 7 for sure.  
 8 Q. Just looking at what you said about B3 at the top of the  
 9 page. There is the B3 section again.  
 10 A. Yeah.  
 11 Q. Am I right again, there is no change again in relation  
 12 to the B3 part?  
 13 A. Not in terms of what we were doing, no, there is no  
 14 change.  
 15 Q. So no guidance there to the design team about,  
 16 for example, part 9 of Approved Document B and the  
 17 provision of cavity barriers?  
 18 A. No.  
 19 Q. Now, in terms of B1, means of warning and escape, in  
 20 issue 2 at section 3.1.1 -- this is on page 6  
 21 {EX000000430/6}, if we can go to that.  
 22 A. Right.  
 23 Q. You have added a new paragraph under the heading "Means  
 24 of escape", "Apartments". So that third more meaty  
 25 paragraph there beginning:

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1 "While the sharing means of escape ..."  
 2 Do you see that?  
 3 A. Yes, I do, yes.  
 4 Q. Am I right that that's a new paragraph that wasn't in  
 5 the first --  
 6 A. It is.  
 7 Q. It says:  
 8 "While the sharing means of escape between  
 9 residential and non-residential accommodation is not  
 10 endorsed by current statutory guidance, these proposals  
 11 represent a continuation of the existing principles for  
 12 means of escape in the building and therefore do not  
 13 create a non-compliance with the requirements of the  
 14 Building Regulations. It is noted in this context that  
 15 the fire loads in the offices and boxing club are no  
 16 greater than those in a typical flat, and that the  
 17 non-residential accommodation will be separated from the  
 18 stairs by ventilated lobbies (see below). The risks the  
 19 occupants of a flat from a fire in a non-residential  
 20 demise are therefore not considered significantly  
 21 greater than those stemming from a fire in another  
 22 flat."  
 23 Do you see that?  
 24 A. I do indeed.  
 25 Q. Now, as we have already discussed, Dr Pearson reviewed

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1 issue 2 of this strategy, didn't he?  
 2 A. He did.  
 3 Q. Did he draft this additional paragraph before the report  
 4 was issued?  
 5 A. I believe he altered what I had already written.  
 6 Q. Is it right that you didn't read what he had written  
 7 before it was sent out?  
 8 A. No, I didn't, it was sent out -- I asked him to review  
 9 it and he made that change and then asked Ms Treanor to  
 10 issue the report.  
 11 Q. Now, when you did read it, we know that you sent him  
 12 an email on 24 October 2013. Can we just go to that.  
 13 That's at {EX000001444} and I want to read from the  
 14 bottom of the chain upwards, so let's start on page 2  
 15 {EX000001444/2}. There is an email from  
 16 Margaret Treanor at 15.40 to Tony Pearson,  
 17 24 October 2013:  
 18 "Hi Tony.  
 19 "Please can you review please for issue today."  
 20 Do you see that?  
 21 A. Yes, I do.  
 22 Q. So he is being sent the draft for review.  
 23 If you go up to his email, which is at the bottom of  
 24 page 1 {EX000001444/1}, we can see right at the bottom  
 25 there, 15.53, he says:

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1 "Terry  
 2 "I note that there is a stair which is shared  
 3 between residential and non-residential parts of the  
 4 building."  
 5 If we can go over the next page {EX000001444/2}, and  
 6 if we could zoom in -- thanks -- he says:  
 7 "Do we need to flag this up as a deviation from the  
 8 standard guidance and provide a comment to the effect  
 9 that the risks to the occupants of the flats from a fire  
 10 in the boxing gym are no greater than those from a fire  
 11 in another flat and/or include compensatory measures?  
 12 "Cheers  
 13 "Tony."  
 14 Do you see that?  
 15 A. I do, yes.  
 16 Q. Then if we go back to page 1 {EX000001444/1} and look at  
 17 the email above his email. So it's still at the bottom  
 18 of the page, there is an email that you send to him,  
 19 24 October at 16.01.  
 20 A. Yeah.  
 21 Q. And you say:  
 22 "Tony  
 23 "This is an existing situation whereby the ressy  
 24 stair ..."  
 25 Is that residential stair; yes? Sorry, have you got

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1 it --  
2 A. No, no, I have got it. Yes.  
3 Q. "This is an existing situation whereby the ressy  
4 stair ..."  
5 When you say "ressy", do you mean residential?  
6 A. Yes.  
7 Q. "... is shared with other uses. If you feel that it  
8 would help, feel [free] to insert some text but, if you  
9 do, bear in mind that the escape route from the ressy is  
10 shared with both the boxing club and office  
11 accommodation. Terry."  
12 Do you see that?  
13 A. Yeah.  
14 Q. Then we can see immediately above, Tony Pearson back to  
15 you, 16.13:  
16 "Terry  
17 "I have added something (although if you think what  
18 I have added is too long and draws too much attention to  
19 the issue, feel free to shorten it )."  
20 Then if we can go to your email at the very top of  
21 that page, you say on the 24th:  
22 "Tony  
23 "I told Mags to send the report out without reading  
24 what you'd added. Had I been able to read it, I would  
25 not have agreed to the amendment as what you've said

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1 highlights the non compliance with codified guidance  
2 but, more importantly, is debatable. Let's hope that  
3 Paul Hanson doesn't pick up on it.  
4 "Terry."  
5 Do you see that there?  
6 A. I do, yes.  
7 Q. I think we see that, actually, before you sent that,  
8 there is an email just below that from Tony Pearson  
9 where he actually sends you the text that he had  
10 inserted. So he sends that to you in an email and then  
11 you have responded.  
12 A. Yes.  
13 Q. Now, do you agree that there was a non-compliance with  
14 the current statutory guidance, ADB?  
15 A. Yes, I think everybody, including Building Control,  
16 understood that this building did not comply fully with  
17 current Building Regulation standards.  
18 Q. Yes, but on this specific point, the sharing of a single  
19 stair with residential and non-residential, that was  
20 a specific non-compliance --  
21 A. That was the non-compliance, yes.  
22 Q. Can you explain why you didn't want to identify the  
23 risks of different purpose groups with different  
24 evacuation strategies sharing a single escape route?  
25 A. I didn't want him to highlight it in such a way that

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1 Paul Hanson of RBKC would say, "Well, it's not  
2 acceptable", because we had been through this at  
3 meetings with RBKC and we didn't believe that there was  
4 a problem with the mixed use, given that we already had  
5 existing mixed use in the building.  
6 Q. But why not highlight it but then say, "This is our  
7 justification, this is our mitigation, there is a very  
8 good reason why this is fine"?  
9 A. I think, on reflection, looking at his wording now,  
10 I agree with what he said, that ... in reality, there is  
11 a higher fire load in a residential flat than there is  
12 in a boxing club or an office, and therefore the fire  
13 severity would be a lot more in a flat.  
14 Q. Well, exactly, that's the point. There is a number of  
15 points here, isn't there? There is an increased risk of  
16 a fire in non-residential, is that right, generally?  
17 A. No, I would say it was the other way around.  
18 Q. I see.  
19 A. Yeah.  
20 Q. But also a lack of detection, in that there are periods  
21 in the non-residential where it's empty and fires can  
22 start and develop undetected; isn't that part of the  
23 problem?  
24 A. I think that -- well, that is part of the problem. The  
25 problem, the main problem with a mixed-use building is

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1 that if a fire starts in any part of the building, no  
2 warning is given to the occupants of the flats. As has  
3 been stated before, I'm sure that buildings of this kind  
4 do not have fire alarm systems which give an evacuation  
5 signal throughout the building. So if a fire occurred  
6 in a non-residential part of this block, then the  
7 occupants of the flats wouldn't know about it.  
8 Now, the risk isn't greater at night because at  
9 night the doors to the non-residential accommodation  
10 will be locked shut, so the fire shouldn't spread. The  
11 bigger danger would be if the smoke escaped while people  
12 were still in the residential -- sorry, the  
13 non-residential part.  
14 Q. I see.  
15 A. But if you look at that within the context of the  
16 overall evacuation strategy, it wouldn't have caused  
17 people in the flats to escape.  
18 Q. Right.  
19 A. So it was really a question of emphasis, and maybe  
20 I overreacted to what Tony put in my report.  
21 Q. Yes.  
22 A. And as I say, having looked at it again, I agree with  
23 what he put.  
24 Q. You say there -- at the time, this was your reaction,  
25 and maybe this is what you are accepting was part of the

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1 overreaction. You say that the non-compliance with  
 2 codified guidance is debatable. Was there really  
 3 a debate about it or was it actually pretty clear it was  
 4 non-compliant?  
 5 A. We could well have a debate with Paul Hanson as to  
 6 whether or not it was a safe arrangement. As it turned  
 7 out, we didn't. They were prepared to accept that the  
 8 measures that we proposed -- fire separation, ventilated  
 9 lobbies -- were sufficient mitigation for the mixed use.  
 10 Q. Yes.  
 11 Can you explain at the time why you were so unhappy  
 12 with an amendment made by a colleague who is appearing  
 13 to act in good faith in making this change?  
 14 A. I think -- I'm not saying I was unhappy. I think that's  
 15 putting it too strongly, really. I think he had altered  
 16 the sense of what I had said originally, and that might  
 17 cause Paul Hanson -- or one of his colleagues, it's  
 18 a bit hard to pick on Paul Hanson particularly -- might  
 19 say, "Oh, maybe we should revisit this issue". That's  
 20 all it was. It was an irritation rather than anger.  
 21 Q. Isn't it the role of that fire safety engineer to point  
 22 out any potential issues around non-compliance with  
 23 statutory guidance so that everyone is fully aware of  
 24 those?  
 25 A. I think we've already done that.

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1 Q. By this amendment?  
 2 A. Well, I think in discussions with them we had already  
 3 said that we realised this doesn't comply.  
 4 Q. I see.  
 5 A. And these are the measures that we're going to take to  
 6 remedy that or mitigate that.  
 7 Q. Would it have been your normal practice not to highlight  
 8 non-compliances with codified guidance in your  
 9 fire strategy reports?  
 10 A. No, I think frequently we have to say, "This doesn't  
 11 meet current standards; however, what we're proposing to  
 12 put in place to mitigate that we consider to be  
 13 adequate".  
 14 Q. Do you agree that not only Dr Pearson but also Ms Cooney  
 15 had expressed concern to you about the merging of the  
 16 stairs and the residential units?  
 17 A. Well, I think -- yeah, but Tony -- Cate had a very quick  
 18 look at the scheme. She only commented, you know, once  
 19 on it. I was aware that they both knew that it was  
 20 a non-compliance, but I had already established with  
 21 Kensington and Chelsea Council, RBKC, that there was  
 22 already a mixture of use in this building pre-existing  
 23 or before. We were addressing the mixed use by certain  
 24 fire safety measures.  
 25 Q. Okay.

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1 A. The alternative would have been to say to the client,  
 2 "I'm sorry, we can't do this, you can't do what you're  
 3 doing", and that would have been it.  
 4 Q. We're going to finish this topic shortly, but just two  
 5 final questions that I feel I must put to you.  
 6 Do you agree that it was inappropriate for you to  
 7 have not addressed the extent of the non-compliance in  
 8 the report originally?  
 9 A. I'm not sure that I didn't address it as such. I mean,  
 10 I think everybody knew that it wasn't a traditional  
 11 residential tower block of flats. It had a mixed use.  
 12 But those mixed uses were already there.  
 13 Q. Do you also agree that it was inappropriate for you to  
 14 have reprimanded Dr Pearson for having addressed the  
 15 point clearly?  
 16 A. I don't think I meant it as a reprimand and I don't  
 17 think he felt it was a reprimand. You will probably get  
 18 the opportunity to ask him that.  
 19 Q. Okay.  
 20 A. But, no, it's not a ... it wasn't a serious  
 21 disagreement.  
 22 Q. Okay.  
 23 A. It might appear that way, but it wasn't.  
 24 MS GRANGE: Yes.  
 25 Mr Chairman, that's an appropriate moment.

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1 SIR MARTIN MOORE-BICK: There is one thing I would like to  
 2 pick up with Mr Ashton.  
 3 MS GRANGE: Yes, of course.  
 4 SIR MARTIN MOORE-BICK: Shall I do that now?  
 5 MS GRANGE: Yes.  
 6 SIR MARTIN MOORE-BICK: Mr Ashton, we have seen that the  
 7 second edition of the document was produced in  
 8 October 2013, as you say, quite a long time after the  
 9 first edition.  
 10 A. Indeed.  
 11 SIR MARTIN MOORE-BICK: Can you remember what prompted it?  
 12 What led you to produce it then and --  
 13 A. I think we either had some additional drawings submitted  
 14 to us or we had a meeting, I can't remember which. But  
 15 there was a hiatus on the project where, as I understand  
 16 it now, there were planning issues. But, no, I think it  
 17 must have been triggered by alterations to the drawings  
 18 that were attached to the previous report.  
 19 SIR MARTIN MOORE-BICK: All right. Thank you very much.  
 20 Do you want to follow that up at all?  
 21 MS GRANGE: No, that's fine, thank you.  
 22 SIR MARTIN MOORE-BICK: Thank you very much, Mr Ashton, we  
 23 are going to break now to have some lunch.  
 24 THE WITNESS: Okay.  
 25 SIR MARTIN MOORE-BICK: We will come back at 2 o'clock,

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1 please. Please don't talk to anyone about your  
 2 evidence -- if you get the chance to do so, that is --  
 3 over the break.  
 4 THE WITNESS: Thank you.  
 5 SIR MARTIN MOORE-BICK: Thank you very much. If you would  
 6 like to go with the usher.  
 7 (Pause)  
 8 Good, thank you very much, 2 o'clock, please.  
 9 (1.00 pm)  
 10 (The short adjournment)  
 11 (2.00 pm)  
 12 SIR MARTIN MOORE-BICK: All right, Mr Ashton?  
 13 THE WITNESS: I am, thank you.  
 14 SIR MARTIN MOORE-BICK: Good, thank you. We will carry on.  
 15 Yes, Ms Grange.  
 16 MS GRANGE: Thank you, yes.  
 17 Just to pick up on the point raised by the Chairman  
 18 just before the lunch adjournment about what it was that  
 19 prompted you to start work again and get back involved  
 20 in 2013, I just want to show you an email on this.  
 21 If we can go to {EX000000693/5}. What seems  
 22 clear -- and I'm going to come back to this in more  
 23 later a bit later -- is that on 17 September 2013, there  
 24 was a second meeting with RBKC Building Control; do you  
 25 recall that?

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1 A. I believe so, yes.  
 2 Q. This is an email you have written to Mr Sounes on  
 3 18 September 2013, the next day, and you say:  
 4 "Bruce  
 5 "Further to yesterday's meeting I've annotated  
 6 copies of your drawings to show what I believe RBKC  
 7 require in order to approve the design from a fire  
 8 safety viewpoint. I've added the necessary fire ratings  
 9 as well."  
 10 You are talking then about vents, areas of vents and  
 11 the ventilated lobbies and what you can achieve for each  
 12 lobby. So it appears to be very much in connection with  
 13 the smoke ventilation system?  
 14 A. Indeed.  
 15 Q. Yes. We will come back to that in due course when we  
 16 pick up a bit more about Building Control.  
 17 Just while we're here, it looks there like what you  
 18 have done is access drawings on a shared link and put  
 19 that shared link in this email when you have annotated  
 20 them and sent them back to Studio E. Is that correct?  
 21 A. I couldn't say without looking at the drawings, to be  
 22 honest.  
 23 Q. I see. I see.  
 24 A. I mean, I just printed them and scanned them.  
 25 Q. I see. But it looks like you are managing to use

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1 a system of communicating on a link with Studio E; do  
 2 you see that there? Because you have put the link in  
 3 the email.  
 4 A. Right, okay.  
 5 Q. The K:\SEA Projects, do you see that?  
 6 A. Yes, indeed.  
 7 Q. Do you have a memory of using that kind of link to share  
 8 drawings back to Studio E?  
 9 A. Not a clear memory but, I mean, clearly I must have done  
 10 it on this occasion.  
 11 Q. Yes.  
 12 Okay, so we're looking now towards issue 3 of the  
 13 outline fire safety strategy which was issued in  
 14 November 2013, and before I ask you about that issue  
 15 specifically, I want to take you to an email chain  
 16 between you and Mr Rek of Studio E, Tomas Rek. This is  
 17 a chain on 1 and 4 November 2013. If we can go to that,  
 18 this is at {EX000000586}. I want to pick it up at the  
 19 bottom of that first page. Do you see there there is  
 20 an email at 17.25 on 1 November from Mr Rek to you, and  
 21 he says:  
 22 "Evening Terry,  
 23 "Can you please confirm that the rainscreen cavity  
 24 fire barriers are to be 60min FR to match the  
 25 compartmentation?"

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1 Do you see that question?  
 2 A. I do, yes.  
 3 Q. Then if you go up the page to your response, we see on  
 4 4 November at 9.05 you respond:  
 5 "Tomas  
 6 "Cavity barriers need only have a 30 minute standard  
 7 of fire resistance.  
 8 "Kind regards  
 9 "Terry."  
 10 Do you see that?  
 11 A. I do, yes.  
 12 Q. Mr Rek's question referred to the rainscreen cavity fire  
 13 barriers. Just go back to the bottom of page 1:  
 14 "Can you please confirm that the rainscreen cavity  
 15 fire barriers are to be ..."  
 16 Did you know what rainscreen Mr Rek was referring to  
 17 in this email?  
 18 A. No, only generically as a rainscreen.  
 19 Q. Did you know any more than that about the rainscreen at  
 20 this stage?  
 21 A. No.  
 22 Q. If you didn't know, wouldn't this have been a good  
 23 opportunity to have asked for that detail?  
 24 A. I think, again, I must have assumed that some detail  
 25 might be forthcoming in the not too distant future. But

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1 I mean, the specific question was: what fire resistance  
 2 period do the cavity fire barriers have to have?  
 3 Q. It's clear, isn't it, that Mr Rek is asking for advice  
 4 in relation to the cavity fire barriers?  
 5 A. Indeed, yes.  
 6 Q. Did this email alert you to the fact that Studio E  
 7 needed guidance on the Building Regulations and ADB  
 8 requirements for the external wall?  
 9 A. Well, I think I gave them the answer, which was that  
 10 cavity barriers only need to have a 30-minute standard  
 11 of fire resistance.  
 12 Q. Did this email prompt you to think, "Oh, I need to  
 13 address this in the outline fire safety strategy because  
 14 they're asking me questions about cavity barriers in the  
 15 external wall"?  
 16 A. It didn't lead me to think that, no.  
 17 Q. Why? Can you explain why?  
 18 A. Because that's a very small detail in relation to the  
 19 external walls. It did sort of come out of the blue in  
 20 the sense that it's not in context, it's just what fire  
 21 resistance the cavity fire barriers have to have.  
 22 Q. No, precisely. Given it had come out of context, as you  
 23 have just said, how did you feel able to provide the  
 24 answer that you did without a full appreciation of the  
 25 external wall work?

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1 A. Because the fire resistance period of the fire barriers  
 2 wouldn't change for any permutation. Rainscreen is  
 3 cladding. It only needs to be subdivided -- or the void  
 4 only needs to be subdivided by cavity barriers, not  
 5 firestops. So 30 minutes is all that's required.  
 6 Q. Were you not curious to know what the rainscreen would  
 7 be and what the insulation sitting behind it would be?  
 8 A. Doesn't mention insulation there.  
 9 Q. Wouldn't that be implicit in a rainscreen system?  
 10 A. Not necessarily. You could apply a rainscreen to  
 11 a masonry wall with nothing else in between.  
 12 Q. Are you saying you didn't know that the purpose of the  
 13 rainscreen system here was to improve the thermal  
 14 performance of the building?  
 15 A. I'm saying just that.  
 16 Q. You didn't know that?  
 17 A. I didn't know that.  
 18 Q. How did you feel able to provide this answer without  
 19 having carried out the analysis of external fire spread  
 20 which you had promised in issue 1 and issue 2 of your  
 21 outline fire safety strategy?  
 22 A. It was just an isolated question which I felt capable of  
 23 answering.  
 24 Q. But why didn't you ask for more information before  
 25 giving this advice?

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1 A. Because, as I said earlier, the advice wouldn't have  
 2 changed. The question was specifically related to the  
 3 fire resistance of the cavity barriers.  
 4 Q. What did your advice mean -- if we could scroll up to  
 5 the top of the page -- with respect to load-bearing  
 6 capacity, integrity and insulation? Aren't there  
 7 different requirements for integrity and insulation for  
 8 cavity barriers?  
 9 A. Yes, there would be no load-bearing capacity.  
 10 Q. But for integrity --  
 11 A. If it's not carrying a load --  
 12 Q. But for integrity and insulation, wouldn't there be  
 13 different requirements? Why have you only given  
 14 a single --  
 15 A. Well, it would be -- if you look in the approved  
 16 document, it tells you what criteria each individual  
 17 element of construction has to achieve, ie the  
 18 integrity, insulation, or load-bearing capacity,  
 19 insulation, et cetera. I'm assuming a degree of  
 20 knowledge of what was in Approved Document B when they  
 21 posed the question. Clearly they didn't know the  
 22 precise answer, which is why they thought it was 60  
 23 rather than 30.  
 24 Q. Well, no.  
 25 Did you yourself look up in ADB what the precise

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1 answer was before giving that advice?  
 2 A. No, I knew that answer off the top of my head anyway.  
 3 Q. Table A1 of ADB defines a performance of 30 minutes  
 4 integrity and 15 minutes insulation, but by only  
 5 providing a single value, your email could be read as  
 6 meaning that 30 minutes was required for both.  
 7 A. It could be read that way, I agree.  
 8 Q. Why weren't you careful to give the precise performance  
 9 requirements set out in ADB?  
 10 A. I didn't think it necessary.  
 11 Q. Because?  
 12 A. Well, because, you know, if it is a 30-minute standard  
 13 of fire resistance in terms of integrity, the insulation  
 14 would probably have been the same.  
 15 Q. What was it about your involvement in this project and  
 16 what you knew about what was happening that meant that  
 17 you didn't think it was necessary to be giving that  
 18 advice?  
 19 A. Well, I'm not quite sure what additional advice I should  
 20 have given on this specific question.  
 21 Q. Well, for example, why did you fail to reference the  
 22 locations that the cavity barriers ought to have been  
 23 fitted to comply with section 9 of Approved Document B?  
 24 A. That wasn't the subject matter of the question. The  
 25 question purely related to the fire resistance. He

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1 might just have been ordering -- looking on the internet  
 2 to find what type of cavity barriers were available and  
 3 how much they were or whatever.  
 4 Q. Were you aware at the time that Approved Document B  
 5 recommended cavity barriers around windows in diagram 33  
 6 of ADB?  
 7 A. Yes, I was aware of that, yes.  
 8 Q. Were you also aware that there was often some debate  
 9 within the industry about the interpretation of  
 10 diagram 33 and how it applied?  
 11 A. I wasn't aware of a debate in the industry generally  
 12 about it. It could be argued -- this is in the abstract  
 13 if you like -- that if you have cavity barriers at the  
 14 junction of the floors and the compartment walls, then  
 15 cavity barriers around windows are probably not  
 16 necessary.  
 17 Q. What view did you take of that?  
 18 A. Sorry?  
 19 Q. What was your view?  
 20 A. It depends on the circumstances of the case, but it does  
 21 seem to be a bit of overkill here, not in this  
 22 particular project but generally.  
 23 Q. Wasn't that precisely the kind of information that you  
 24 ought to have been providing, either in response to this  
 25 kind of request or in your outline fire safety

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1 strategies?  
 2 A. It's the sort of information I might have provided  
 3 having looked at detailed drawings which show what was  
 4 being built or what was proposed to be built, then  
 5 I could have made a judgement as to whether or not  
 6 I felt it necessary to go back to RBKC and say, "We  
 7 don't think it's necessary to put cavity barriers in  
 8 these locations, do you agree?" But we weren't at that  
 9 stage of development, as far as I was concerned.  
 10 Q. But Studio E obviously were, because they were asking  
 11 you about the fire resistance of the cavity barriers?  
 12 A. But that -- I'm sorry, that's just one question. They  
 13 might have said to me: what do doors to flats have to  
 14 be, do they have to be 30 minutes or 60 minutes? It's  
 15 that level of question.  
 16 Q. I see. So, to summarise on this, you felt that that one  
 17 sentence was sufficient to advise Studio E at this time?  
 18 A. I could have said 30 minutes standard of fire  
 19 resistance, 15 minutes standard of integrity, that would  
 20 have made it clearer.  
 21 Q. You could have also said: by the way -- be clear on the  
 22 locations where you need these cavity barriers.  
 23 A. Yes, I could have said that, yes.  
 24 Q. Let's go to issue 3 then of your outline fire safety  
 25 strategy. We find that at {EXO00001107}.

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1 So that exchange that you had with Mr Rek that we  
 2 just looked at concluded on 4 November 2013, and then on  
 3 7 November 2013, just three days later, you produce  
 4 issue 3 of your outline fire safety strategy. This  
 5 final issue of that strategy was prepared less than  
 6 two weeks after issue 2; that's right, isn't it?  
 7 A. Correct.  
 8 Q. We see there the date on this page of 7 November, and  
 9 then on the second page {EXO00001107/2}, if we can go to  
 10 that, we can see that it was prepared by you, and this  
 11 time, rather than Dr Pearson who reviewed issue 2, we've  
 12 got Mr McEleney again there as the -- he is now a senior  
 13 consultant within Exova. We can see that there. Is  
 14 that right?  
 15 A. Yes, indeed.  
 16 Q. But he is still junior to you, isn't he?  
 17 A. He is, yes.  
 18 Q. We will come back to the review process later.  
 19 We can also see on the box on that page -- at the  
 20 top, we've got various boxes, and it talks about reason  
 21 for revision. Under issue 3, we see there it says:  
 22 "Third issue -- revised to take into account  
 23 comments from the design team."  
 24 Is that right?  
 25 A. Yes, indeed.

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1 Q. Is it right that, in the days before this was finalised,  
 2 you had had various exchanges with the Studio E design  
 3 team, particularly about the fire strategy for the lower  
 4 levels of the tower and at walkway level?  
 5 A. I believe so, yes.  
 6 Q. For the transcript, these are at {EXO00001408}, and  
 7 changes to the fire strategy are marked up on  
 8 {EXO00001501}.  
 9 Now, in terms of this issue, what RIBA stage was  
 10 this report intended for, this issue 3?  
 11 A. Well, it would still be RIBA stage D, as far as I was  
 12 concerned. It's just another iteration of pretty much  
 13 the same report with minor modifications, but we hadn't  
 14 moved on into stage E as far as I was concerned.  
 15 Q. Does it follow that by this stage, as with at the time  
 16 of issue 2, you weren't aware that Studio E's stage D  
 17 report had been issued in August 2013?  
 18 A. No, because I hadn't seen it.  
 19 Q. Now, if we can go to the introduction on page 4  
 20 {EXO00001107/4}, we see, "The refurbishment comprises",  
 21 it's a the familiar bullet point list, but again we see  
 22 no mention of the overcladding works, do we?  
 23 A. No, that's right.  
 24 Q. Can you explain why in this issue of the fire strategy  
 25 there is no mention of it?

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1 A. Well, I think the explanation is things hadn't moved on  
2 from the issue of the previous report, but I accept that  
3 we should have said -- added another bullet point  
4 dealing with cladding.

5 Q. Yes, and you say in the very last part of this  
6 introduction:

7 "The report is based upon discussions held with the  
8 design team, the Royal Borough of Kensington & Chelsea  
9 and on fire access and fire strategy drawings produced  
10 by Studio E ..."

11 Now, unlike with issue 2, where you had set out two  
12 specific drawings, you don't set out here the drawings  
13 that the report was based on.

14 A. No, I don't.

15 Q. Can you explain why that was?

16 A. I can't honestly say why. I mean, it may well have been  
17 self-explanatory because the report would have been  
18 appended to drawings by Studio E, but we would normally  
19 put the drawing numbers down so that there was no  
20 misunderstanding as to what we were talking about.

21 Q. Yes.

22 A. So we omitted to do it on this occasion.

23 Q. Okay. Because wouldn't it be difficult for anyone to  
24 look at this report and understand what information had  
25 fed into it if you had not identified those drawings?

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1 A. Yes, it would be.

2 Q. Let's go to the B4 section again first. This is on  
3 page 9 {EX000001107/9}, at the top of the page. Again,  
4 we see exactly the same wording as before under the B4  
5 requirements; do you see that?

6 A. Indeed.

7 Q. Can you explain why the wording remained unchanged?

8 A. Because as far as I was concerned, or as far as Exova  
9 was concerned, nothing had changed.

10 Q. Can you explain, when you are issuing this issue 3, why  
11 you hadn't made sure that you had up-to-date information  
12 about the cladding, so that you could do the analysis in  
13 this report?

14 A. Well, the only explanation I can give you is the one  
15 that I've already given you, which is that we hadn't  
16 been given details of these.

17 Q. Did you take any steps to try and clarify the position  
18 concerning the cladding? Did you ask Studio E? Did you  
19 speak to any other members of the team?

20 A. No, I didn't.

21 Q. Why was that?

22 A. I assumed -- wrongly, as it turned out -- that they  
23 would send something to me and ask for comment in order  
24 for the thing to be progressed.

25 Q. Is it right that you took no steps prior to the

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1 production of this issue of the report to ascertain  
2 whether the cladding could have an adverse effect on the  
3 building in relation to external fire spread?

4 A. That's true, I didn't take any steps to confirm that one  
5 way or the other.

6 Q. Do you agree that the lapse of time between the various  
7 iterations of the strategy -- issue 1 in October, then  
8 issue 3 in November 2013 -- made it all the more  
9 important for you to clarify the position about the  
10 cladding and whether it could have an adverse effect in  
11 relation to external fire spread?

12 A. No, I think I've already said that I was expecting  
13 something to be -- to come up to be discussed on it.  
14 The gaps between the -- I've explained the gap between  
15 issue 1 and issue 2, because we were disengaged, if you  
16 like, from the design team for a considerable number of  
17 months. Issue 2 to issue 3 was just really a reflection  
18 of some changes to the layouts that we discussed with  
19 Studio E.

20 Q. When you were drafting this issue 3, did you think this  
21 was likely to be a fairly final version of the strategy?

22 A. No, I didn't.

23 Q. Did you look back at Exova's fee proposal at what had  
24 been promised during stage D and E of the process?

25 A. No, I wouldn't do that as a matter of routine.

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1 Q. So, you know, the project --

2 A. I'm just assuming it would carry on until such point as  
3 we were able to say, "Well, now we have the full  
4 picture".

5 Q. I see. But in circumstances where the project had gone  
6 a bit cold in 2013, it's been picked up again --

7 A. Yeah.

8 Q. -- you didn't have a look back at the fee proposal and  
9 remind yourself what you had committed to doing on the  
10 project?

11 A. No. I wouldn't do that routinely.

12 Q. We saw, and we looked at it in detail yesterday, that  
13 a detailed fire strategy for the proposed development  
14 was promised in that proposal?

15 A. It was, yes, indeed.

16 Q. So this wasn't the detailed fire strategy?

17 A. No. It certainly -- for example, it doesn't contain  
18 an analysis under B4.

19 Q. No, and that detailed fire strategy was said to be going  
20 to include determination of any external fire spread  
21 issues --

22 A. Indeed.

23 Q. -- and recommendations of compartmentation.

24 A. Yeah.

25 Q. But we don't see that in this report.

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1 A. No. No, as I say, this wasn't -- as far as I was  
 2 concerned, this wasn't the final report.  
 3 Q. So when did you think you were going to be doing that?  
 4 A. When we got information from the design team to enable  
 5 us to do that.  
 6 Q. I see.  
 7 A. I mean, we weren't speaking to each other on a weekly  
 8 basis. This is -- you know, we would have expected to  
 9 get something from somebody in the design team to enable  
 10 us to progress this strategy.  
 11 Q. Weren't you anxious to get that part of the strategy  
 12 sorted out?  
 13 A. "Anxious" isn't the word that I would use in that  
 14 particular context because, as I think I've said  
 15 earlier, there were other jobs that I was dealing with.  
 16 Q. Do you think the reality is that you had simply  
 17 forgotten about the overcladding and it had just fallen  
 18 off your radar?  
 19 A. No, I don't believe that to be the case at all.  
 20 Q. So it was still in your mind, was it?  
 21 A. Well, in the back of my mind, yes.  
 22 Q. But you didn't think to drop Studio E an email and say,  
 23 "Guys, you are aware, aren't you, I'm going to need to  
 24 know much more about the external wall?"  
 25 A. No, I didn't think to do that.

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1 Q. So you did intend that an analysis of external fire  
 2 spread would be carried out in a future issue of the  
 3 report, as you wrote here?  
 4 A. Absolutely.  
 5 Q. What would that analysis consist of? What was in your  
 6 mind at this stage?  
 7 A. Well, it would have dealt with all three parts of what  
 8 B4 consists of, which is the roof covering, but it might  
 9 have been just a sentence saying, "No changes proposed  
 10 to the roof coverings". It would have dealt with the  
 11 construction of the external walls, including in that  
 12 section where cavity barriers would have been provided.  
 13 It would have described the construction of the external  
 14 walls, or in this case the stuff that was being applied  
 15 to them. And the other one would have been  
 16 a reiteration that, in terms of space separation, there  
 17 were no issues to consider.  
 18 Q. I see.  
 19 A. That's the sort of detail that we would have gone into,  
 20 but before we dealt with that, we would have sat down  
 21 with Studio E and looked at the drawings, and possibly  
 22 with a contractor. I mean, the normal arrangement is  
 23 that you have a design concept which is agreed in  
 24 principle and you then go out to tender, and somebody --  
 25 the provision of cladding would be a subcontract to

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1 somebody who was an expert in the field, and you would  
 2 sit down with them as well. Which is why we say at  
 3 stage F we sit down with the approved contractors.  
 4 Q. I see. But you had envisaged at stage D/E that you  
 5 would be determining any external fire spread issues and  
 6 you would be recommending compartmentation.  
 7 A. Absolutely.  
 8 Q. I'm going to put this to you directly so you have the  
 9 chance to respond: would you agree that maintaining this  
 10 wording without clarifying the position about the  
 11 cladding and what had and hadn't been done was  
 12 an abdication of your responsibilities as the designated  
 13 fire strategy consultant for the project?  
 14 A. I wouldn't put it in those strong terms. I don't think  
 15 abdication is the right word. I mean, we can only react  
 16 to what we're being given to look at.  
 17 Q. Would you agree that it demonstrated a lack of  
 18 thoroughness on your part when considering fire --  
 19 A. I would accept that maybe we should have pursued  
 20 Studio E a bit more firmly or at all to say, "What are  
 21 you doing about the external walls?" That's as far as  
 22 it went.  
 23 Q. Again, why didn't you at the very least set out clear  
 24 performance requirements to comply with the B4  
 25 requirement, particularly given you say you were aware

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1 that external fire spread was an issue with the use of  
 2 combustible materials?  
 3 A. At that stage I didn't know they were proposing  
 4 combustible materials. I wouldn't highlight that  
 5 particular aspect of the design as being the most  
 6 crucial.  
 7 Q. Okay, well, we have gone over being sent the stage C  
 8 report and we have your evidence on that.  
 9 I want to pick up something in your second statement  
 10 at this stage. This is at {EXO00001775/2}, at  
 11 paragraph 2.3.  
 12 Now, this is a statement that you served recently in  
 13 response to Mr Crawford's oral evidence, and we will  
 14 come back to this in due course when we look at what was  
 15 happening in 2014 on the project.  
 16 A. Right.  
 17 Q. I just want to ask you about this paragraph. You say  
 18 there, 2.3:  
 19 "Had Mr Crawford suggested using Celotex, I would  
 20 have raised doubts about that. At the time, I was aware  
 21 that there were some façade systems which used  
 22 combustible insulation materials and were still  
 23 considered acceptable, because the system as a whole was  
 24 tested or assessed under BS 8414 and found to comply  
 25 with BR 135, or was accepted as an engineered solution.

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1 However, where the 'linear route' to compliance under  
 2 ADB was followed, it required insulation to be  
 3 non-combustible or of limited combustibility, and I was  
 4 not aware of any Celotex products that would meet that  
 5 requirement."

6 Do you see that there?

7 A. I do, yes.

8 Q. As I say, we will come back to this and look at this  
 9 statement in more detail, but for now, I want to ask  
 10 you: if you knew that there were these two routes to  
 11 compliance, the linear route within ADB and the whole  
 12 system test under 8414 and BR 135, why didn't you spell  
 13 that out in the B4 section of your fire strategies?

14 A. I think it comes back to what -- the answer that I gave  
 15 you before to: why didn't you put out the -- include the  
 16 performance specification in your strategy? We don't as  
 17 a matter of course put in performance requirements in  
 18 every clause of every report.

19 Q. I appreciate that. You would need to have something to  
 20 think that it was going to be relevant.

21 A. Yeah.

22 Q. But you did know there was going to be overcladding, you  
 23 had no reason to think that the overcladding had somehow  
 24 fallen away. Why didn't you flag, for example, the need  
 25 for the insulation to be of limited combustibility if

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1 following ADB?

2 A. Because at that stage I didn't know which route they  
 3 were thinking of pursuing.

4 Q. And why didn't you think to ask?

5 A. Well, it goes back to: why didn't I speak to them at all  
 6 about the issue? I would have expected them to speak to  
 7 me first, to tell me what their proposals were, to  
 8 enable me to make a judgement and to advise them  
 9 accordingly.

10 Q. Yes. Was that not something again that you were keen to  
 11 know, which route to compliance they were going to be  
 12 following, because that obviously then potentially would  
 13 affect how you analyse the external wall?

14 A. No, I think the two routes, if you like to call them  
 15 that, are reasonably self-explanatory. If you want to  
 16 use what you call a linear route, that means you have to  
 17 use materials which satisfy the criteria in Approved  
 18 Document B. If you want to go another way, then that  
 19 requires a lot more effort; you need to get it tested,  
 20 if it hasn't already been tested, or you need to get it  
 21 assessed based on a test that has been done on a similar  
 22 set-up, and it's quite a lengthy process.

23 But we didn't have any of that discussion with them  
 24 because they didn't raise the question with me.

25 Q. No, but given that route could be a lengthy process, and

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1 potentially an expensive one -- that is right, isn't it,  
 2 if you're going to go down that route?

3 A. I don't know whether it's more expensive than going the  
 4 linear route, as they call it, because I don't believe  
 5 that those systems that have been tested are more  
 6 expensive. The cost of those tests has been borne by  
 7 the manufacturers.

8 Q. Sorry, I thought for a moment that you were saying that  
 9 one possibility was that there was a bespoke test in  
 10 relation to these materials.

11 A. No, the tests are defined in BS 8414 and BR 135. So if  
 12 you don't want to use materials which already satisfy  
 13 Approved Document B, you have to get them tested or  
 14 assessed.

15 Q. Okay.

16 What did you understand at this stage -- a slightly  
 17 different topic but still relevant to the external  
 18 wall -- about what would be at the very top of the  
 19 building, at the head of the cladding system?

20 A. I have no idea. I had never seen any drawings.

21 Q. Did you know that there was to be a crown structure at  
 22 the top of the building?

23 A. No, I didn't.

24 Q. Were you ever made aware that there was a crown  
 25 structure at the top of the building?

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1 A. No.

2 Q. So you were never asked to advise on that aspect?

3 A. No.

4 Q. On to the B3 requirement, so looking at this on  
 5 page 8 -- this is back to the outline fire safety  
 6 strategy issue 3, that's {EX000001107/8}. This is  
 7 what's said here about the B3 requirement.

8 So, again, scanning down this, we can see there is  
 9 no reference here to Approved Document B and section 9  
 10 or paragraph 12.8 about the requirement for cavity  
 11 barriers, is there?

12 A. No. No, this is headed, "Compartmentation".

13 Q. When you were writing this bit of your report or  
 14 finalising it, did you not have in mind that Studio E  
 15 had just a few days before consulted you about the  
 16 cavity barrier requirements and clearly did need  
 17 guidance in this area?

18 A. All that it asks me -- and I think we've just been  
 19 through this -- was that they needed to know the fire  
 20 resistance of cavity barriers: was it 60 minutes or was  
 21 it something else?

22 Q. Yes.

23 If we look back, with B3 still in mind, at page 4  
 24 {EX000001107/4} of the report --

25 A. Right.

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1 Q. -- where you set out the introduction and what the  
 2 refurbishment would comprise. Do you see the last  
 3 bullet you've got:  
 4 "Generally - improvements to the building services."  
 5 Do you see that?  
 6 A. I do, yes.  
 7 Q. Were you aware at this time that the refurbishment works  
 8 would involve key changes to the lobbies on all floors  
 9 of the building?  
 10 A. I knew that they were going to put in a mechanical smoke  
 11 extract system, if that's what you're asking.  
 12 Q. What about new risers, water pipes for the heating and  
 13 for the cold water system?  
 14 A. No.  
 15 Q. You didn't know that?  
 16 A. Well, I knew there were improvements to the services,  
 17 but whether they were relevant to the fire safety  
 18 strategy or not was questionable.  
 19 Q. Again, why didn't you ask? Why didn't you find out  
 20 whether they might be relevant?  
 21 A. Well, I just didn't.  
 22 Q. Because you don't explain what those works were, and --  
 23 A. This is just a general introduction to what the  
 24 refurbishment comprised. It didn't go into minute  
 25 detail as to what was going on.

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1 Q. No, I understand, but with reference to  
 2 compartmentation, why do you not consider the impact on  
 3 compartmentation of these general improvements to the  
 4 building services, such as the heating and the cold  
 5 water?  
 6 A. I didn't think they were significant.  
 7 Q. What gave you that impression?  
 8 A. Well, they're not -- they don't introduce major breaches  
 9 in compartmentation. In a block of apartments, they  
 10 could only be run in the common area, and then feed off  
 11 into the various apartments, cold water and the like,  
 12 and then that would have to be firestopped at some  
 13 point, but that would have been in a specification which  
 14 I had not seen.  
 15 Q. I see. Because you don't consider, for example, the  
 16 impact of the cupboard in the lobbies which would house  
 17 the new risers and the impact of that in terms of  
 18 compartmentation, do you?  
 19 A. No, but it was an existing cupboard, I believe.  
 20 Q. But you wouldn't think to check whether the imposition  
 21 of new pipework, new risers, might have affected the  
 22 building's compartmentation on all the lobbies?  
 23 A. No, because it wasn't a particularly significant  
 24 alteration to the building as far as I was concerned.  
 25 Q. Okay.

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1 Looking then at B1, means of warning and escape,  
 2 I just want you to look briefly at this. If we go to  
 3 page 7 {EX000001107/7}, we can see in the middle of the  
 4 page, under the heading "Smoke ventilation of lobbies",  
 5 you have included a note which said this. It said:  
 6 "(NOTE: this supply and extract system will be  
 7 overhauled as part of the improvement to the building  
 8 services. This is covered in a separate report by  
 9 Max Fordham)."  
 10 Do you see that there?  
 11 A. I do, yes.  
 12 Q. So in this third issue of your report, you have left the  
 13 design of the lobby smoke control system to Max Fordham  
 14 to address; is that correct?  
 15 A. It was their duty, if that's the right word, from  
 16 day one. It was part of their brief.  
 17 Q. You didn't think you ought to set out in this  
 18 fire strategy for the refurbishment, for the building,  
 19 any performance requirements for the new smoke control  
 20 system?  
 21 A. I think I've answered this question earlier. The  
 22 performance requirements for smoke ventilation systems  
 23 serving a common lobby are well known in the industry,  
 24 certainly would have been well known to Max Fordham,  
 25 which is that the objective is to prevent the spread of

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1 smoke into the stair so it can be used by other  
 2 occupants of the building and the fire service.  
 3 I didn't see the need to spell that out in this place.  
 4 Q. Would you agree with me that those performance criteria  
 5 fell into two categories: first of all, the performance  
 6 criteria for the smoke control system itself; and,  
 7 secondly, the performance criteria for the fire and  
 8 smoke dampers as well?  
 9 A. But that -- that's just the detail. What you would need  
 10 to do would be to improve -- sorry, approve the concept  
 11 initially, and you would then talk about -- I mean, when  
 12 you're designing a smoke extract system which is only  
 13 designed to extract smoke on one floor, you have  
 14 a series of dampers. The one on the fire floor opens  
 15 and the others remain closed. But that would be  
 16 an integral part of the design of the system which was  
 17 being done by others.  
 18 Q. I see. So because it was being done by others, you  
 19 didn't look at the potential impact, for example, on  
 20 compartmentation of having these shafts rising through  
 21 the building and whether the dampers were adequately  
 22 rated or not?  
 23 A. No, I would see that as part of the design of the  
 24 system. But I mean, we weren't introducing -- or they  
 25 weren't introducing further openings in the

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1 compartmentation; those openings already existed. The  
 2 vertical shafts were already there.  
 3 Q. Yes, they were.  
 4 A. Yeah.  
 5 Q. Do you accept that the fire strategy should have at  
 6 least made clear the role of the system, the performance  
 7 requirements it should have met, and how that system  
 8 contributed to life safety in the building?  
 9 A. I could have done that, but I didn't think it was  
 10 necessary to go into that level of detail.  
 11 Q. Do you agree that in a building which featured a single  
 12 stair which served flats and non-residential demise, the  
 13 smoke control to the stair was a fundamental cornerstone  
 14 of the fire strategy for residents and for firefighters  
 15 which should have been addressed in your reports?  
 16 A. I'm not sure I would agree that it -- it's certainly  
 17 an important feature of it, but given that we -- there  
 18 was one there already and it was being improved, I don't  
 19 really see why I needed to go into any more detail in  
 20 this report.  
 21 Q. Okay.  
 22 Now, you go on in this B1 section -- we can keep  
 23 this bit up on the screen here -- to indicate that for  
 24 the walkway, mezzanine and ground storey levels -- there  
 25 is a blue heading there for that -- the lobby to the

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1 boxing club and the community room should have automatic  
 2 opening vents of 0.4 metres squared in area. Do you see  
 3 that in the second line?  
 4 A. Yeah.  
 5 Q. Do you agree that this advice was contrary to the  
 6 guidance given in ADB 2013 because the size of the  
 7 opening vents were not compliant with the relevant  
 8 British Standard -- that's BS 5585:2004 -- which  
 9 required vents of more like a metre squared in area?  
 10 A. I accept that, but, I mean, that was the best that we  
 11 could achieve.  
 12 Q. Again, isn't it about, did it not occur to you to  
 13 highlight that it wasn't compliant with that guidance,  
 14 but then explain why that was the best that could be  
 15 achieved and why that was nevertheless acceptable for  
 16 this building?  
 17 A. Well, we discussed it with the local authority and they  
 18 appeared to be happy with that as being the best that  
 19 could be achieved.  
 20 Q. Why didn't you draw attention to this non-compliance in  
 21 your strategy and explain why you were recommending  
 22 a departure from that guidance?  
 23 A. Well, the guidance in relation to smoke ventilation of  
 24 firefighting shafts in residential buildings relates to  
 25 a fire in a residential apartment, and the code asks for

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1 vents larger than this to deal with a domestic fire,  
 2 which is sometimes a lot more severe than a fire in  
 3 an area such as a boxing club or an office.  
 4 But, all right, maybe there should have been some  
 5 more detail in there, but it's a statement of what we  
 6 were doing there and it was accepted by the  
 7 local authority.  
 8 Q. Okay.  
 9 Stair width. I just want to ask you about stair  
 10 width in this third issue.  
 11 A. Right.  
 12 Q. If we go in the B1 section back to page 6  
 13 {EX000001107/6}, and there you have dealt with various  
 14 aspects of means of escape.  
 15 A. Right.  
 16 Q. I think it's right that nowhere there do you ever state  
 17 that the stair width of 1,040 millimetres was  
 18 60 millimetres less than the current design guidance ADB  
 19 would have required, which is 1,100 millimetres.  
 20 A. No, you know, it's an existing stair.  
 21 Q. But, again, wasn't that a non-compliance with the  
 22 current statutory guidance that you should have referred  
 23 to expressly and then said you have taken into account  
 24 nevertheless when you are drafting the fire strategy?  
 25 A. I'm not sure that we would start all of our

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1 fire strategies with a list of the ways in which  
 2 a building doesn't comply with current standards.  
 3 I mean, if you're seriously suggesting that we should  
 4 have recommended to the client that he increase the  
 5 width of that stair to the code compliant width, that's  
 6 just not practicable.  
 7 Q. No, I'm not suggesting that, nor am I suggesting that  
 8 you do list out all the areas of non-compliance at the  
 9 beginning of the report, but what I am --  
 10 A. So why are you picking on this particular aspect?  
 11 Q. Well, because the stairs were narrower than current  
 12 design guidance would recommend, and wasn't that a point  
 13 that could be made and then explained why it would  
 14 clearly not be practical to widen them, but to show that  
 15 you have taken it into account when you have balanced  
 16 all the other measures? Isn't that exactly what  
 17 a fire strategy is?  
 18 A. Well, it conceivably might have added something to the  
 19 narrative, but not a great -- a lot, I don't believe.  
 20 I mean, what should we have said? "The stair is  
 21 actually less than 1,100 millimetres but we don't  
 22 consider that to be a major factor in fire safety in  
 23 this building?"  
 24 Q. Yes, "For the following reasons, because" --  
 25 A. I can't give you any reasons why it wouldn't be any

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1 better, because it was an existing stair, and in terms  
 2 of its capacity to evacuate the building, it was  
 3 perfectly adequate.  
 4 Q. Could that not have affected, for example, the  
 5 performance of the smoke control system and how --  
 6 A. No, that wouldn't have had any bearing --  
 7 Q. -- good you would want it to be?  
 8 A. Sorry?  
 9 Q. How good you would want it to be.  
 10 A. No, because the stair -- as I said earlier, the smoke  
 11 extract system is designed to stop smoke getting into  
 12 the stair, not compensate for its lack of width.  
 13 Q. I see.  
 14 Do you agree that there is no requirement specified  
 15 anywhere here in this report for the responsible person  
 16 regarding mobility-impaired persons?  
 17 A. Well, that's a difficult one. I'm not saying it's  
 18 a difficult question for me. There are no requirements  
 19 to put in place provisions for facilities for disabled  
 20 persons in residential buildings. They are excluded  
 21 from the requirements for other buildings simply,  
 22 I think, on the basis that you can't manage it in this  
 23 type of building, and that persons with disabilities, if  
 24 they're not in the fire affected apartment, are  
 25 perfectly safe to stay where they are.

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1 Q. Does that mean that, in the preparation of these  
 2 reports, you didn't consider the means of escape for  
 3 those with disabilities?  
 4 A. No, but the law didn't require us to.  
 5 Q. At this time, were you aware that Approved Document B  
 6 requires consideration of means of escape for those with  
 7 a disability?  
 8 A. I think that that was a general statement in the  
 9 approved document, but it didn't apply specifically to  
 10 apartment blocks, because there are no provisions for  
 11 apartment blocks in the guidance.  
 12 Q. Can we just go to that. It's at {CLG00000224/13}, and  
 13 it's 0.19 of ADB.  
 14 A. Right.  
 15 Q. It's there on the bottom left. If we can zoom in on the  
 16 bottom half of the page, "Inclusive design", 0.19, we  
 17 looked at this two days ago with Ms Barker.  
 18 Were you aware that this section draws attention to  
 19 part M of the Building Regulations, "Access to and use  
 20 of buildings", which requires reasonable provision for  
 21 access by people to buildings? Were you aware of that?  
 22 A. Yes, I'm aware of the general cross-reference.  
 23 Q. Were you aware that it said:  
 24 "People, regardless of disability, age or gender,  
 25 should be able to gain access to buildings and use their

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1 facilities, both as visitors and as people who live or  
 2 work in them."  
 3 A. Yes, I am aware of that.  
 4 Q. Then this:  
 5 "As such the fire safety measures incorporated into  
 6 a building will need to take account of the needs of all  
 7 those persons who may have access to the building. It  
 8 is not appropriate, except in exceptional circumstances,  
 9 to presume that certain groups of people will be  
 10 excluded from a building because of its use."  
 11 A. I absolutely agree with that sentiment, but I go back to  
 12 the point I made: there are no recommendations in the  
 13 documentation issued by Government departments or others  
 14 as to what you do about means of escape for disabled  
 15 persons in residential buildings.  
 16 Q. I appreciate --  
 17 A. You might say, well, there should be. But the fact is  
 18 there are not.  
 19 Q. I appreciate that within the rest of ADB you don't have  
 20 a specific recommendation that you ought to have this  
 21 fire performance because of the need to accommodate  
 22 X people or the need to have a refuge here or whatever.  
 23 But isn't this signalling to you: you have still got to  
 24 take into account the needs of those persons when you  
 25 are putting, for example, your fire strategy together?

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1 A. Generally, for a new residential building, we would say  
 2 under means of escape for disabled persons, there are no  
 3 requirements -- you are not required to provide  
 4 facilities for them to escape.  
 5 Q. Does that mean, then, you just don't think about it any  
 6 more?  
 7 A. Well, exactly.  
 8 Q. Can we look also at page 17 {CLG00000224/17} in the  
 9 right column. Under "Criteria for means of escape",  
 10 that is halfway down that page, can you see there, there  
 11 is a note:  
 12 "Some people, for example those who use wheelchairs,  
 13 may not be able to use stairways without assistance.  
 14 For them evacuation involving the use of refuges on  
 15 escape routes and either assistance down (or up)  
 16 stairways or the use of suitable lifts will be  
 17 necessary."  
 18 Do you see that?  
 19 A. I do, yes.  
 20 Q. Again, did you have that in mind when you were working  
 21 on the Grenfell project?  
 22 A. Not at all. I think the important point is that you do  
 23 not provide refuges in stairs in residential buildings,  
 24 and you don't have management arrangements to evacuate  
 25 disabled persons because frequently, and quite often,

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1 there are no management facilities on site. You might  
 2 think that's a bad thing, but that's not a decision  
 3 taken by fire consultants; that's a decision taken by  
 4 the Government.  
 5 Q. Does it follow, then, therefore, that there was no  
 6 consideration given to the type of people living in the  
 7 building when constructing the fire safety strategy with  
 8 particular regard to Approved Document M?  
 9 A. Yes, you could say that. I mean, Approved Document M is  
 10 outside the scope of fire. I mean, for a new building  
 11 you would obviously have to consider that the building  
 12 provides access for people with disabilities.  
 13 Q. Did you ever ask for any information arising out of,  
 14 say, consultations with residents or other information  
 15 about who was living in the building to be provided to  
 16 you?  
 17 A. No, I didn't.  
 18 Q. You didn't ever ask the TMO about that?  
 19 A. No, I didn't, no.  
 20 Q. And did you ever give consideration to the types of  
 21 people likely to be living in high-rise residential  
 22 buildings in terms of needs?  
 23 A. No. It isn't something that a fire consultant would  
 24 necessarily do.  
 25 Q. At this time, were you aware that Exova had provided the

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1 outline fire strategy for the Kensington Academy and  
 2 Leisure Centre project, which did refer to disabled  
 3 evacuation under that heading, a heading called  
 4 "Disabled evacuation"? Were you aware of that?  
 5 A. Probably, because I think I reviewed or helped my  
 6 colleague dealing with that, but ...  
 7 Q. Why would it have been considered for that project but  
 8 not for this one?  
 9 A. Because the law requires that it is in the other  
 10 building.  
 11 Q. Did you never consider, for example, refuges for the  
 12 non-residential accommodation below level 4?  
 13 A. They were already there.  
 14 Q. Those refuges, were they?  
 15 A. No, no, the non-residential elements were already there,  
 16 albeit in a slightly different configuration.  
 17 Q. But did you ever consider refuges in relation to that?  
 18 A. No. I mean, had I done so, I would have soon realised  
 19 that there wouldn't be a management regime in that  
 20 building who were able to evacuate people with  
 21 disabilities.  
 22 Q. I see.  
 23 Do you also agree that nowhere in your reports is  
 24 there an acknowledgement of the mixed-use nature of the  
 25 building and so the potential for there being multiple

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1 responsible persons, some more in control than others?  
 2 A. No.  
 3 Q. That wasn't something you addressed?  
 4 A. No, it wasn't something I considered. I mean, bear in  
 5 mind that the uses were fairly low key. You had  
 6 a boxing club with two adults and a few boys -- sorry,  
 7 young children. You had a sort of office-type  
 8 accommodation which was very low occupancy. You had  
 9 a community room for use of the occupants of the  
 10 building. I didn't see that there needed to be a great  
 11 deal of more detail provided.  
 12 Q. Given that you might have had multiple responsible  
 13 persons, wouldn't that potentially present challenges in  
 14 terms of communication and co-ordination which ought to  
 15 have been addressed in your report?  
 16 A. No, I think that would be more in a fire safety  
 17 management plan of the sort to satisfy the Regulatory  
 18 Reform Order. We can't really dictate how a building is  
 19 run when we do a fire strategy. We can say that there  
 20 are certain aspects of the design of this building which  
 21 do require to be managed, but that's about as far as we  
 22 can go.  
 23 MS GRANGE: Mr Chairman, I think I might call for a break in  
 24 a moment, but I am going to ask one more question before  
 25 I do, and then we're going on to a bigger topic.

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1 SIR MARTIN MOORE-BICK: So that would be a good point?  
 2 MS GRANGE: Yes.  
 3 SIR MARTIN MOORE-BICK: Yes, all right.  
 4 MS GRANGE: So this is just picking up on something you said  
 5 yesterday. We established that you don't have formal  
 6 fire engineering qualifications, and Ms Barker said  
 7 something similar.  
 8 Did Exova have a policy of putting unqualified  
 9 personnel onto this job, given that 90% of their people  
 10 you said were qualified in fire engineering? Was there  
 11 a deliberate decision that this job could justify having  
 12 people without the fire engineering qualifications?  
 13 A. Yes, I believe it could. I mean, when I say -- you say  
 14 unqualified, I mean --  
 15 Q. I beg your pardon, not having a formal fire engineering  
 16 qualification.  
 17 A. Well, I don't -- whilst having a formal fire engineering  
 18 qualification is desirable for everybody doing fire  
 19 engineering, it's not absolutely essential for  
 20 a building where they're proposing fairly modest changes  
 21 to the layout and you have an individual who has dealt  
 22 with hundreds of buildings like that.  
 23 Q. I see. But back to my question: do you think there was  
 24 something about this project which meant that it wasn't  
 25 considered necessary to have people with formal fire

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1 engineering qualifications on it?  
 2 A. No, I think you can't just say that it has to be  
 3 somebody with fire engineering qualifications, you have  
 4 to have regard to experience as well. Somebody who's  
 5 just got a fire engineering degree and has come out of  
 6 a college may not be the appropriate person to look at  
 7 a difficult building in terms of getting the means of  
 8 escape sorted out properly.  
 9 Q. Was cladding at all in your mind?  
 10 A. Cladding wasn't -- no, I don't think cladding played any  
 11 part in the decision as to who ran the job. But you  
 12 also have to accept that when a job comes in to  
 13 a particular office, there will be a finite number of  
 14 people who can work on it, and it may be that there  
 15 aren't people with fire engineering qualifications with  
 16 enough capacity to deal with this particular job. But  
 17 I really don't think that it was necessary for a fire --  
 18 a qualified fire engineer to work on this project.  
 19 Q. Okay.  
 20 A. That implies that somebody who isn't, isn't good enough  
 21 to do the job, and I believe that to be wrong.  
 22 MS GRANGE: Understood. Thank you.  
 23 Mr Chairman, that would be a good moment.  
 24 SIR MARTIN MOORE-BICK: That a good point?  
 25 MS GRANGE: It is, yes.

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1 SIR MARTIN MOORE-BICK: All right. We are going to have  
 2 a short break now, Mr Ashton. I'm going to say 3.10.  
 3 The usual instruction: please don't talk to anyone about  
 4 your evidence while you're out of the room. All right?  
 5 Thank you very much.  
 6 (Pause)  
 7 All right, 3.10.  
 8 MS GRANGE: Yes.  
 9 (2.53 pm)  
 10 (A short break)  
 11 (3.10 pm)  
 12 SIR MARTIN MOORE-BICK: All right, Mr Ashton?  
 13 THE WITNESS: Yes, thank you.  
 14 SIR MARTIN MOORE-BICK: Very good. Thank you very much.  
 15 Yes, Ms Grange.  
 16 MS GRANGE: I have one follow-up question on that topic that  
 17 we were looking at in terms of the disabled and  
 18 mobility-impaired persons.  
 19 A. Yes.  
 20 Q. Was it normal to have such a passive client as the TMO  
 21 in terms of passing you information about the residents  
 22 in the building? Would you normally expect to be  
 23 provided with more information about --  
 24 A. No, I wouldn't describe TMO as passive. But we wouldn't  
 25 be passed that sort of information unless there were

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1 reasons for us to consider it, for example if there was  
 2 a building that was purpose-built for people with  
 3 disabilities. But we would treat Grenfell Tower the  
 4 same as any other block of apartments.  
 5 Q. Yes, okay.  
 6 I want to move now to a slightly different topic,  
 7 which is about the review process and quality control  
 8 within Exova. After that, we are going to discuss some  
 9 further ad hoc advice you gave after November 2013 on  
 10 the project.  
 11 Now, to whom, if anyone, in Exova did you report to  
 12 in respect of the Grenfell project?  
 13 A. I didn't report to anybody in that sense. I mean, I was  
 14 the manager of the London office, and the buck stopped  
 15 with me, if I can put it that way.  
 16 Q. Was there anybody at Exova responsible for overseeing  
 17 your work on the project?  
 18 A. Oh, yes, the director of the company would have overseen  
 19 my work in that sense, yes.  
 20 Q. Who would be that?  
 21 A. Mr David Harries.  
 22 Q. Did he do that on this project?  
 23 A. No, he wouldn't routinely do it on projects, you know,  
 24 it was just maybe a spot-check now and then.  
 25 Q. Because it appears from the documents -- correct me if

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1 I'm wrong -- that essentially you were working on this  
 2 project on your own for large parts of it; is that  
 3 right?  
 4 A. That would be true of a number of projects that we work  
 5 on, given the resources that we have.  
 6 Q. Was there any chartered professional for Exova working  
 7 on the project with you?  
 8 A. Tony.  
 9 Q. Tony Pearson?  
 10 A. Tony Pearson was chartered. James Lee I think was  
 11 working towards being chartered.  
 12 Q. Was anybody your formal line manager within Exova?  
 13 A. My formal line manager was David Harries, the general  
 14 manager of the division.  
 15 Q. At the time you were working on the Grenfell project,  
 16 were you aware whether or not Exova was certified under  
 17 British Standards Institute publication ISO 9001 on  
 18 quality management systems?  
 19 A. We weren't certified at that point, but we were working  
 20 towards getting certification and we are now certified.  
 21 Q. When did Exova get that 9001 --  
 22 A. I couldn't give you a precise date, but it was certainly  
 23 after we were working on Grenfell.  
 24 Q. I see.  
 25 What I want to do now is look at the quality control

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1 procedure that Exova followed in relation to two  
2 different aspects of the work: the first in relation to  
3 the fire safety strategy reports and the second with  
4 regard to technical emails. Okay? We'll look at those  
5 two things.

6 Looking first at fire safety strategy reports, can  
7 we look at an internal Exova document entitled "Overall  
8 Procedure Review". We find this at {EXO00001209}.

9 Now, looking at the top of this, it's called  
10 "Overall Procedure Review". It's said to be issue 2,  
11 which is dated 18 December 2014; do you see that?

12 A. Yes, indeed.

13 Q. And it's to be reviewed in 2018. So this comes towards  
14 the end of your time on the Grenfell project.

15 A. Right.

16 Q. I just want to ask you about whether some of these  
17 operating procedures were familiar to you at the time  
18 you were working on the Grenfell project.

19 A. Yes, they were.

20 Q. Yes.

21 A. Yes.

22 Q. So let's look in the introduction at item 2. It says  
23 there:

24 "Operating Procedures are issued to assist staff in  
25 ensuring that the requirements of the relevant standards

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1 are followed correctly in the relevant division. If  
2 there is any conflict between this Operating Procedure  
3 and the relevant standard the requirements of the  
4 standard take precedence."

5 Do you see that?

6 A. Yes, I do.

7 Q. Then if we go on to page 3 {EXO00001209/3}, at  
8 paragraph 8, there we have a section called "Main  
9 project phase".

10 A. Right.

11 Q. At the bottom of the page, in the first paragraph, it  
12 states:

13 "EXOVA undertakes a diverse range of project types.

14 The most appropriate main phase procedure should be  
15 selected from the following list. If no clear match is  
16 found the General Main Phase Procedure should be adopted  
17 which requires a specific project plan to be developed."

18 Then it says:

19 "Each procedure may be supplemented by ..."

20 And then it says those things. A number of items  
21 are listed there, and if you look down the bullets, five  
22 bullets down, there is a black heading in bold,  
23 "Guidelines":

24 "Guidelines which provide advice and background  
25 information on how to approach specific projects."

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1 Do you see that?

2 A. I do, yes.

3 Q. In the light of that, were there any guidelines that you  
4 followed when drafting the fire safety strategies for  
5 the Grenfell project?

6 A. No. There were guidelines but I didn't religiously  
7 follow those guidelines; I just followed the procedure  
8 which I had adopted on numerous previous projects.

9 Q. When you say there were guidelines, does that mean there  
10 were guidelines which were specific to how to prepare  
11 fire safety strategy reports?

12 A. No, not specifically. I mean, bear in mind that these  
13 things were produced in, you know, the early part of the  
14 20th century -- sorry, in the 2000s. But custom and  
15 practice before that had been to follow agreed  
16 procedures as to how you composed reports.

17 Q. I see.

18 A. And all reports were reviewed to ensure that those  
19 general guidelines were followed.

20 Q. Why did you feel that you didn't need to follow the  
21 guidelines and you could just follow what you had always  
22 done?

23 A. Well, the structure of the report that I -- the reports  
24 that I produced on Grenfell was the same as the  
25 structure of reports on numerous other projects.

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1 Q. On page 4 {EXO00001209/4} at paragraph 9, there is  
2 a heading "Project closure"; do you see that there?

3 A. Yes, indeed, yeah.

4 Q. And it says, "EXOVA procedure" -- and then a number of  
5 letters and numbers are given for a procedure --  
6 "describes the project closure process which  
7 requires ..."

8 Do you see that?

9 A. Yes, I do.

10 Q. Then we have a number of bullet points including:

11 •" a check that all elements of the project to have  
12 been completed satisfactorily

13 •" a check that all time and other costs have been  
14 posted via the timesheet ...

15 •" a check that the project has been fully  
16 invoiced ...

17 •" all relevant electronic files to be in the placed  
18 in the correct folders

19 •" all hard copies of the files to be appropriately  
20 filed."

21 Do you see that there?

22 A. Yes, indeed.

23 Q. Now, were you aware that there were project closure  
24 processes when you were working on the Grenfell project?

25 A. Yes, there were. I was aware of those procedures, yeah.

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1 Q. Did you follow those procedures?  
 2 A. No, because as far as I was concerned, the project  
 3 didn't finish in the normal way.  
 4 Q. Did you ever do a check that all elements of the project  
 5 had been completed satisfactorily?  
 6 A. No. I mean, as I said in response to earlier questions,  
 7 at the time of producing the last fire strategy report  
 8 I was still awaiting details of the external enclosures  
 9 for me to examine and report on, and that never  
 10 happened.  
 11 Q. I appreciate that. Let's think forward, at any stage in  
 12 the project for a moment.  
 13 A. Right.  
 14 Q. I appreciate we had stopped at issue 3 for the moment,  
 15 but we'll look at the other pieces of email advice you  
 16 gave over 2014, 2015, et cetera.  
 17 But at any stage thereafter, did you follow this  
 18 project closure procedure and check that all elements of  
 19 the project had been completed satisfactorily?  
 20 A. No, I didn't do that check.  
 21 Q. Again, why would that be?  
 22 A. Because, as I say, I don't believe that the report --  
 23 sorry, that the project followed the normal progression  
 24 of other projects.  
 25 I did say earlier in my statement, I think, that

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1 sometimes we would work and do a proportion of the  
 2 proposal that was contained in our fee proposal and then  
 3 we might not proceed for some reason, either the project  
 4 came to a halt or they chose somebody else.  
 5 Q. Did it ever occur to you to do a check and, if  
 6 necessary, get back in contact with the design team or  
 7 the client and say, "Look, we've done this, it seems to  
 8 have run into the sand, but is there any more we should  
 9 be doing?" Did you ever think to do that?  
 10 A. No, I didn't think to do that. I thought it would come  
 11 the other way, if I'm honest.  
 12 Q. Let's look at another internal Exova document entitled  
 13 "Project Completion Procedure". This can be found at  
 14 {EX000001224}, and this one is said to have become  
 15 effective, if we look at that top set of boxes, issue  
 16 date: 1 April 2010, and the review date was  
 17 1 April 2012.  
 18 Do you know if there was a review of this internal  
 19 document after 2012?  
 20 A. Do you mean the procedure document?  
 21 Q. Yes. So it was issued, and it looks like it is supposed  
 22 to be reviewed after two years, and then, as we saw with  
 23 the other document, you then maybe get an issue 2. Do  
 24 you know what happened with any issue after this?  
 25 A. No, I don't.

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1 Q. Were you aware of this project completion procedure in  
 2 2010 and through to 2012?  
 3 A. Oh, yes.  
 4 Q. Did you ever follow it?  
 5 A. On some projects, yes, but not on every one, I must be  
 6 honest. You have to accept that there are other  
 7 priorities that, you know, you're actually dealing with  
 8 live jobs. I mean, okay, the ISO 9001 standards are, if  
 9 you like, a counsel of perfection. At that time we  
 10 weren't certified to ISO 9001. I think there were  
 11 procedures that weren't necessarily followed to the  
 12 letter.  
 13 Q. Yes. If we look in page 1 at section 4, this deals with  
 14 closure of the project. If we can read that first  
 15 paragraph:  
 16 "For many projects the exact point at which the  
 17 consultancy work has been completed is not always  
 18 immediately evident. The project manager should make  
 19 careful note of the scope of services provided in the  
 20 contract documentation. This would initially be the fee  
 21 proposal which was provided and the details confirmed on  
 22 the fee acceptance form."  
 23 Do you see that?  
 24 A. I do, yes.  
 25 Q. Was a careful note taken of the scope of services

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1 provided?  
 2 A. By myself?  
 3 Q. Yes.  
 4 A. Well, I understood what we were going to be doing,  
 5 because I wrote the fee proposal.  
 6 Q. It then goes on to say:  
 7 "Appendix A shows the flow chart.  
 8 "To ensure that a high standard is maintained, the  
 9 project manager is required to:-  
 10 "• Check that all elements of the project to have  
 11 been completed satisfactorily. This will entail a  
 12 review of the scope of services set out in the fee  
 13 proposal and a specific review of the documents stored  
 14 on the electronic filing system to determine that the  
 15 scope of services have been completed."  
 16 Now, pausing there, would the project manager have  
 17 been you for the Grenfell project?  
 18 A. It would have been, yes.  
 19 Q. I think we've asked this but I'm going to ask it again:  
 20 in accordance with this procedure, did you ever check  
 21 that all elements of the project had been completed  
 22 satisfactorily at any stage?  
 23 A. No, I didn't. There was an expectation that there would  
 24 be further work coming on the project.  
 25 Q. Then we see that "or" there after that first bullet. It

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1 says:  
 2 "Or  
 3 " Contact the client or client's representative to  
 4 ensure that they are satisfied that the scope of  
 5 services matched with their expectations. Any comments  
 6 from the client should be stored on the electronic  
 7 filing system in the correspondence folder."  
 8 Again that was the alternative I was talking about  
 9 earlier.  
 10 A. Yes.  
 11 Q. Did it ever occur to you to do that, to contact the  
 12 client --  
 13 A. No.  
 14 Q. -- to check?  
 15 I now want to look at the quality control of the  
 16 fire strategy. Can we look at paragraph 4.7 of your  
 17 witness statement, {EX000001621/9}. This was with  
 18 reference to the first edition of your fire strategy.  
 19 You said:  
 20 "The report was signed as having been reviewed by  
 21 Sean McEleney. It is standard practice within Exova for  
 22 reports to be peer reviewed in this way. Mr McEleney's  
 23 role was to review the report against the drawings which  
 24 had been provided: I would expect him to check that what  
 25 was set out made sense and that there were no clear

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1 errors in it."  
 2 Do you see that?  
 3 A. I do, yes.  
 4 Q. What would have been the process if there were clear  
 5 errors in the report?  
 6 A. He would have told me.  
 7 Q. Yes.  
 8 A. Either verbally or he would have annotated a hard copy  
 9 of the draft.  
 10 Q. And then, what, you would have --  
 11 A. I would then have considered those or maybe discussed  
 12 them with him and then altered the report accordingly.  
 13 Q. Would that be the same process if someone made  
 14 amendments to a report?  
 15 A. Not quite. That was a little less formal. I think we  
 16 were under some time constraints to get the report  
 17 issued, as we frequently are, and so at the time I was  
 18 content for Tony Pearson to make any changes he saw fit.  
 19 Q. Can we look at paragraph 3.8 of Ms Cooney's witness  
 20 statement. That's {EX000001590/3}. If we look at  
 21 paragraph 3.8, in the second sentence she says:  
 22 "The peer review process at Exova is part of the  
 23 document quality control, and typically involves someone  
 24 of equal or greater seniority to the drafter reviewing  
 25 the report to ensure that there are no clear errors and

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1 that it is sound in its basis."  
 2 Do you see that?  
 3 A. I do, yes.  
 4 Q. Do you agree that the reviewer ought to be someone of  
 5 equal or greater seniority than the drafter?  
 6 A. Yes, I do agree.  
 7 Q. Now, with your reports on the Grenfell project, we know  
 8 Mr McEleney was junior to you. You confirmed that  
 9 earlier.  
 10 A. Yes.  
 11 Q. And Mr Pearson, was he junior to you as well?  
 12 A. He was, yes, but in the case of Mr Pearson, he was  
 13 suitably qualified to review a report that I prepared.  
 14 Q. So why were the reports on this project being checked by  
 15 someone more junior to you?  
 16 A. It was -- I'm assuming it was just down to availability  
 17 of somebody to do the review, bearing in mind that we're  
 18 not sitting at a desk all day long every day; we're out  
 19 at meetings with other clients, people are on holiday,  
 20 et cetera.  
 21 Q. Yes. Is that normal practice within Exova, that reports  
 22 are actually checked by someone junior to the --  
 23 A. No, I wouldn't have said it was normal practice, but it  
 24 does happen because of staffing resources.  
 25 Q. So on this job, is your explanation that the reason it

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1 happened was because of staffing issues on this project?  
 2 A. No, I think that, as I say, one of the reports was  
 3 reviewed by Tony Pearson, who was adequately qualified  
 4 to review a report of that nature. I don't believe that  
 5 Seán McEleney was an inadequate person technically to  
 6 review the report, considering what the content of the  
 7 report was.  
 8 Q. Was the Grenfell project a lower priority for Exova than  
 9 other projects going on at the time?  
 10 A. No, no. No. No, I mean, if you're in an office with  
 11 four people and three of them -- or two of them are out  
 12 and not available or on holiday or whatever, and you're  
 13 left with one other person, you will generally ask that  
 14 person to review the report if you can't get it reviewed  
 15 by somebody of a comparable grade, if I can call it  
 16 that, in another office.  
 17 Q. Isn't one answer to that to prepare the report  
 18 sufficiently in advance so that you can always make sure  
 19 you find a senior person?  
 20 A. Yes, that's fair comment.  
 21 Q. Does that mean that often within Exova you were  
 22 providing reports quite close to the deadline when they  
 23 were needed?  
 24 A. In my case, yes. I'm not saying that's generally true  
 25 of Exova.

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1 Q. I also want to ask you why the practice of reviewing  
2 these fire strategy reports seems to differ as between  
3 different Exova employees.

4 So I'm going to try and summarise for you what  
5 everyone said. James Lee says the process of reviewing  
6 was to check whether it was accurate and reasonable;  
7 Mr McEleney says it was proofreading and checking for  
8 clear mistakes; Clare Barker said it was reviewing the  
9 report alongside the drawings considered in order to  
10 produce that report, looking at the relevant guidance  
11 referred to in the report in order to ensure that the  
12 report was correct; and then Dr Pearson gives the most  
13 detailed explanation. Perhaps we could go to his  
14 statement. This is at {EX000001753/3}. This is at  
15 paragraph 3.9. He says there:

16 "The process of peer reviewing a report involves  
17 comparing what is written in the report with any floor  
18 plans provided and ensuring (i) that the report is  
19 factually correct; (ii) that it correlates with the  
20 plans; (iii) that the approach taken is appropriate,  
21 e.g. that the design is based on the appropriate design  
22 code(s), or any fire engineering analyses are based on  
23 sound principles; (iv) that it is correct where the  
24 report says that there is compliance with the cited  
25 design code(s); and (v) that the facts, logic and

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1 mathematics of any fire engineering analyses are  
2 correct."

3 Do you see that there?

4 A. I do, yes.

5 Q. Can you explain why we have so many different versions  
6 of what the process of reviewing a fire strategy report  
7 actually involved?

8 A. I think probably because each of the individuals  
9 concerned would have been asked to put it in their own  
10 words. I don't know that for a fact, but clearly the  
11 textbook -- the Tony Pearson definition is the textbook.

12 Q. Would you accept that there was variation within Exova  
13 as to how people did review these fire strategy reports?

14 A. I think that's inevitable, although they should follow  
15 basic -- the basic rules are that the report makes  
16 sense, that any -- well, the first three at least of  
17 what is in Tony Pearson's statement.

18 Q. I mean, Mr McEleney said it's about proofreading and  
19 checking for clear mistakes. That's very different to  
20 what's described here by Dr Pearson.

21 A. I agree with you, and that may be Seán's perception.

22 Q. Just thinking back to Mr Pearson's amendment which he  
23 made to issue 2 which we looked at, where he drew  
24 attention to the non-compliance of the escape route with  
25 ADB.

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1 Would you usually expect to discuss such amendments  
2 before anything was issued to the client?

3 A. Yes, that would be the normal procedure. If changes  
4 were required, the reviewer would talk to the person who  
5 prepared the report to agree a way forward.

6 Q. Now, in the specific instance we're referring to, you  
7 didn't discuss any such issues with him, did you,  
8 before --

9 A. No. It would be evident from the correspondence that we  
10 were under some time pressure to get the report issued,  
11 so I felt sufficiently confident that what he would do,  
12 if he needed to do anything, would be adequate for  
13 purpose.

14 Q. I see. Yes, you sent an email to Margaret Treanor  
15 saying, "Please get Tony to review the attached, then  
16 format it and send it to Bruce at Studio E."

17 So you were happy for him to review it and then for  
18 it to be sent straight out.

19 A. Indeed.

20 Q. You actually said to Tony Pearson, "I told Mags to send  
21 the report out without reading what you had added". Do  
22 you see that?

23 A. Because the most important thing at that juncture was to  
24 get the report sent out. I mean, at the end of the day,  
25 that particular instance you're quoting wasn't

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1 significant; it was just a different way of wording  
2 something.

3 Q. Can I ask now about quality control of emails, and  
4 thinking in particular about technical emails. Staying  
5 within Dr Pearson's witness statement and looking at  
6 page 3 {EX000001753/3}, paragraph 3.7, if we pick it up  
7 four lines down he says there:

8 "As a general rule at Exova, technical advice would  
9 not be sent to external clients without two people  
10 considering the advice; it was therefore not uncommon  
11 for Mr Ashton to discuss technical queries with me or  
12 other Senior Consultants."

13 Do you see that?

14 A. I do, yes.

15 Q. Just to see the complete picture in terms of what he  
16 says, on page 6 {EX000001753/6} at paragraph 4.5, and  
17 this is with reference to an email that we're going to  
18 come back to and look at, three lines from the bottom he  
19 says:

20 "... it was not uncommon for Mr Ashton to discuss  
21 technical matters with other staff, as all e-mail  
22 containing technical information had to be approved by  
23 at least two people, and this might explain my  
24 involvement."

25 Do you see that there?

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1 A. Yes. I mean, I think what he said is substantially  
2 correct.  
3 Q. So do you agree with Dr Pearson's statement about the  
4 approval of emails containing technical information?  
5 A. Emails giving a technical opinion are in many ways as  
6 important as reports. They do need to be sound when  
7 they're given, and therefore we generally look to our  
8 colleagues to confirm that what we're saying makes  
9 sense.  
10 Q. Can you help us as to what you would have understood  
11 technical advice or technical information to cover in  
12 such email advice? Can you just help us as to what you  
13 would imagine that would cover?  
14 A. Well, we talked earlier about an email I received from  
15 Studio E about cavity barriers.  
16 Q. Yes.  
17 A. That would be a technical question to which I gave  
18 a technical response.  
19 Q. Did somebody check that, a second person check that,  
20 before you responded on that occasion?  
21 A. I didn't consider it to be necessary because it was  
22 a fairly simple question.  
23 Q. I see. So in terms of your own practice, is it fair to  
24 say that not every email you would send containing  
25 technical information would have a second person review

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1 it before it went out?  
2 A. That might be true because of the sheer number of emails  
3 that we dealt with, but if there was something that  
4 I felt I needed a second opinion on, I would definitely  
5 get a second opinion.  
6 Q. Do you know where this checking of technical advice was  
7 explained in Exova's written quality control procedures?  
8 A. I don't think it's specifically mentioned as emails, but  
9 I've always understood that any -- anything that goes  
10 out of the office containing a technical opinion needs  
11 to be reviewed by somebody else.  
12 Q. Now, I'm going to turn now to look at the other work and  
13 the ad hoc advice that you gave after issue 3 of the  
14 outline fire safety strategy.  
15 A. Yeah.  
16 Q. Is it right that after issue 3 was produced on  
17 7 November 2013, you had no further meetings with RBKC  
18 Building Control to discuss the fire strategy?  
19 A. I think that's correct, yes.  
20 Q. Just picking up on the contact that you had had with  
21 John Hoban of RBKC Building Control, did you ever  
22 discuss the cladding and whether it complied with the  
23 Building Regulations with Mr John Hoban or any other  
24 RBKC Building Control inspector?  
25 A. No.

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1 Q. Can we go to look at Mr Hoban's first witness statement,  
2 this is at {RBK00033934/8}. I want to look at  
3 paragraph 67. So in that paragraph he says:  
4 "I also looked up information on the insulation."  
5 Then he talks about the cladding panels in the next  
6 sentence. Then it's this bit I want to ask you about,  
7 he says:  
8 "I was also advised at the initial meeting on site  
9 by the specialist consultant that the cladding would  
10 comply with the standards set out in Approved  
11 Document B."  
12 Do you see that?  
13 A. I do, yes.  
14 Q. Just to be fair, I think we ought to scroll back to the  
15 page previously {RBK00033934/7} and just see the  
16 question that Mr Hoban was being asked. So he was  
17 asked:  
18 "What advice or information was available, and what  
19 assessments were made, about the components that  
20 comprised the exterior of the building, their fire  
21 safety, fire-resistance and compliance with safety  
22 standards ..."  
23 Do you see that in bold at 64?  
24 A. Indeed, yes.  
25 Q. This was part of a paragraph where he answered that. So

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1 if we go back, then, to page 8 {RBK00033934/8}, he says  
2 he's advised at the initial meeting on site by the  
3 specialist consultant.  
4 Does it follow from the fact that you never went to  
5 site that it couldn't have been you giving this advice  
6 that the cladding would comply with the standards set  
7 out in ADB?  
8 A. Yes, that's correct. By specialist consultant, I would  
9 assume that was somebody who was involved with the  
10 cladding.  
11 Q. Can we also look at Mr Hoban's second witness statement.  
12 This is at {RBK00050416/17}, and I want to look at  
13 44(a). He has been asked, and this is the question:  
14 "In para 67 [that was what we just looked at] you  
15 state that you were advised by 'the specialist  
16 consultant that the cladding would comply with Approved  
17 Document B.'"  
18 He's asked:  
19 "Who was the specialist consultant?"  
20 He says:  
21 "It would have been employees from Max Fordham,  
22 Exova and Siderise."  
23 Do you see that?  
24 A. Yes, I see that.  
25 Q. Now, what is your response to that? Could it have been

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1 you that Mr Hoban was referring to in his evidence at  
 2 this point?  
 3 A. No, I think he was mistaken. I can't believe that  
 4 Max Fordham would have answered questions about  
 5 cladding. We certainly didn't answer -- we never met  
 6 John Hoban on site. Siderise, as far as I know, make  
 7 firestops and cavity barriers. I don't think they make  
 8 cladding. So I think, with respect, he's mistaken.  
 9 Q. Did you ever advise Mr Hoban or anybody else from RBKC  
 10 Building Control that the cladding would comply with the  
 11 standards set out in Approved Document B?  
 12 A. No. Categorically no.  
 13 Q. Now, we looked at it when we started back in this  
 14 afternoon session that you had had a second meeting with  
 15 RBKC Building Control back on 17 September 2013; is that  
 16 right?  
 17 A. If you -- I mean, yes, probably.  
 18 Q. Yes, let's look at an email that helps with this.  
 19 {EX000000390}.  
 20 A. Right.  
 21 Q. This was an email you sent there on 18 September:  
 22 "Further to yesterday's meeting ..."  
 23 A. Yes, this is the one you showed me first thing.  
 24 Q. Yes, exactly.  
 25 Now, you're referring in that email to general

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1 arrangement drawings and drawings of the mezzanine and  
 2 walkway. We can see that from the attachments at the  
 3 top. Can you see that? It's got "Grenfell GL",  
 4 "Grenfell Mezz", "Grenfell Walkway"; do you see that?  
 5 A. Yes.  
 6 Q. Can you recall whether there were any discussions at  
 7 that meeting about the external cladding?  
 8 A. No, there weren't any.  
 9 Q. Can you explain why there weren't any at that meeting?  
 10 A. I can't, no, not really. When we had meetings with  
 11 Building Control, it was purely to do with getting the  
 12 means of escape and firefighting access sorted out.  
 13 Q. Would it have been normal on a project of this size to  
 14 have only met with Building Control two times over the  
 15 length of the project, so that would be November 2012  
 16 and September 2013?  
 17 A. No, I would have expected further meetings, and I think  
 18 our fee proposal included for at least three meetings,  
 19 but I would have to check that.  
 20 Q. Did it ever occur to you to initiate those further  
 21 meetings to make sure that they happened?  
 22 A. It's only -- sorry. I mean, it's only necessary to  
 23 arrange meetings with Building Control if the architect  
 24 asks for it.  
 25 Q. I see.

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1 A. Or, in extremity, Max Fordham, if he wanted a meeting  
 2 with them to discuss mechanical issues or building  
 3 services issues. I would never initiate a meeting  
 4 myself. I did the first one because it was easier for  
 5 me to contact them than it was for Studio E.  
 6 Q. Yes, and you sent them directly your outline fire safety  
 7 strategy.  
 8 A. Yeah, that's right.  
 9 Q. When you had those two meetings with RBKC  
 10 Building Control, was it in your mind that there would  
 11 need to be a meeting with them at some point to discuss  
 12 the external cladding?  
 13 A. Yes, and all other aspects of the fire safety design,  
 14 not just the ones that we agreed with them. In my mind,  
 15 the design team wanted to get the internal refurbishment  
 16 sorted out first. That was their first priority.  
 17 Q. Can you explain why you never checked that that meeting  
 18 had occurred, that there had been a meeting with  
 19 Building Control to discuss the cladding?  
 20 A. No, it's in the same category as why weren't we looking  
 21 at the external walls, you know, there was never any --  
 22 we were never asked to.  
 23 Q. And it didn't concern you that there hadn't been  
 24 a meeting with Building Control to discuss the external  
 25 wall?

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1 A. No, I mean, I'm assuming that that would have happened  
 2 at some point in the future. Whether we were still  
 3 involved or whether after the contractor had been  
 4 appointed, I don't know.  
 5 Q. Now, I want to ask you a little bit about the basis upon  
 6 which you carried on providing advice into 2014 and  
 7 2015.  
 8 We know that after Rydon's appointment in early  
 9 2014, you did continue to provide advice, in particular  
 10 in relation to the upgrade and overhaul of the existing  
 11 smoke ventilation system and in relation to the  
 12 rainscreen cladding system, and we will come to this.  
 13 You dealt with that in September 2014 and March 2015.  
 14 Do you agree?  
 15 A. Yes, yes.  
 16 Q. Did you understand that this advice was provided  
 17 pursuant to Exova's engagement as fire strategy  
 18 consultants as set out in your fee proposal?  
 19 A. No. I took it to be ad hoc advice that came about  
 20 because they wanted some information, and this  
 21 frequently happens with us, with other projects.  
 22 People -- maybe even two years after the completion of  
 23 the work, we'll get a random query from somebody about  
 24 how things operate, and we generally will give them that  
 25 advice, and that's how it works. I mean, I would have

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1 been -- if I was certain that I was no -- we were no  
 2 longer employed on this project, because Rydon hadn't  
 3 novated us, I would have been entitled to say, "Look,  
 4 you know, we're not really part of the design team  
 5 anymore".  
 6 Q. But you never did say that, did you?  
 7 A. No, I didn't, and, you know, perhaps I should have done.  
 8 But that doesn't change the fact that we were no longer  
 9 part of the design team. Once Rydon was appointed, they  
 10 didn't novate us and, as far as I was concerned, that  
 11 was the end of it. We were not actually employed by  
 12 KCTMO. They didn't write to us and say, "Will you carry  
 13 on providing advice to Studio E".  
 14 Q. But they have accepted your fee proposal, which said at  
 15 stage F that you would be providing advice as needed to  
 16 the building contractor.  
 17 A. Well, I think --  
 18 Q. So why -- you're still client side, I appreciate you  
 19 haven't been novated, but given you are client side, why  
 20 did you think that your appointment had come to an end?  
 21 A. Well, because they appointed -- they gave the contract  
 22 to Rydon and Rydon didn't approach us to ask us if we  
 23 wanted to work with them.  
 24 Q. But isn't it right that it's quite common for --  
 25 sometimes a fire engineer might get novated over, but

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1 isn't it right that sometimes the fire engineer might  
 2 stay client side and keep advising the client?  
 3 A. Under those circumstances I would have expected to get  
 4 a clear instruction from the client that I'm to carry on  
 5 working for him rather than the contractor. But that  
 6 does happen, you're quite right. But I would expect to  
 7 be told in no uncertain terms that I'm still employed  
 8 doing that. I received nothing from TMO to that effect.  
 9 Q. I see. But I think, as you made clear yesterday, you  
 10 weren't expecting an instruction from the TMO to go to  
 11 each stage; you were assuming you were going to each  
 12 stage unless you heard contrary.  
 13 A. No, this is a separate -- entirely separate issue. This  
 14 is where they have appointed a contractor who  
 15 effectively takes over as the person designing and  
 16 building the building.  
 17 Q. But is it right that you never said, "Well, now there is  
 18 a contractor that you have appointed, by the way, we  
 19 regard ourselves as no longer the fire engineers on this  
 20 project"?  
 21 A. I should have said that when they made the first  
 22 approach, but I didn't.  
 23 Q. So on what basis, just to be clear, did you carry on  
 24 providing the advice that you did on the project,  
 25 for example on the smoke vent system, on the external

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1 wall? We will come to look at that in due course.  
 2 A. I thought it would be helpful, and if it wasn't --  
 3 you know, if they wanted free advice, we would have  
 4 given them free advice, simply because that's the way we  
 5 operate.  
 6 Q. I see.  
 7 Were you aware that Exova didn't charge separately  
 8 for this advice but treated it as covered by the fixed  
 9 lump sum fee already paid by the TMO for stage D and E?  
 10 A. Yes, I am aware of that.  
 11 Q. Do you agree that you continued to provide advice  
 12 throughout the duration of the project up until  
 13 March 2016?  
 14 A. No -- well, I wouldn't say we provided continuing  
 15 advice. That assumes a regular contact with the design  
 16 team and it wasn't anything like that. I think there  
 17 were two isolated emails in 2016 which I answered  
 18 because they sent them in, but I don't think that we had  
 19 a continuing relationship beyond the initial ad hoc  
 20 queries that came in.  
 21 Q. We've checked, Mr Ashton, and between 1 April 2014 and  
 22 24 March 2016, which was your last email exchange, you  
 23 actually were sent or were copied in to approximately 90  
 24 emails on the Grenfell project.  
 25 A. 90?

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1 Q. Yes.  
 2 A. But I don't believe that we answered 90 or anything like  
 3 that.  
 4 Q. You may not have answered 90, but --  
 5 A. But this comes back to this thing about copying people  
 6 in on emails. That doesn't necessarily imply that they  
 7 still have an involvement in the project. 90 emails  
 8 implies that we would have been working every week on  
 9 the project, and that certainly isn't true.  
 10 Q. Can we look at what you say at paragraph 5.10 of your  
 11 witness statement. This is at {EXO00001621/14}. So  
 12 5.10. We should actually pick it up at 5.9. This is  
 13 "Exova's involvement after the appointment of Rydon":  
 14 "I was not aware at the time precisely when Rydon  
 15 took over the site, or were formally appointed. I was  
 16 aware in general terms that Rydon had taken on overall  
 17 responsibility for the project. We were not approached  
 18 by Rydon to provide services to them. This is not an  
 19 unusual state of affairs."  
 20 I think you just explained that to us.  
 21 A. Yes.  
 22 Q. Then you say:  
 23 "As a result of this, we were not copied on project  
 24 correspondence, or invited to attend design team  
 25 meetings, or to agree commercial terms for our continued

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1 involvement. On occasion, some queries were raised with  
2 me from time to time, and I discuss these below, but  
3 aside from that we were no longer involved in the  
4 project."

5 Now, in your experience, was that an unusual state  
6 of affairs, to be giving advice from time to time in  
7 response to queries, but otherwise to consider  
8 yourselves no longer involved? Was that a normal state  
9 of affairs?

10 A. As I said earlier, it does happen quite frequently.  
11 People will say -- you know, somebody -- it might be the  
12 manager of the building already occupied, "Can you just  
13 give me some information as to what this meant in the  
14 fire strategy", and I don't think that's unreasonable  
15 for them to ask that or for me to answer it.

16 Q. Did you --

17 A. I don't think we've seen copies of 90 emails that you  
18 have referred to. I mean, we have been through all of  
19 the documentation and I don't ... 90 emails doesn't ring  
20 any bells with me at all. And why would they send them  
21 to me?

22 Q. There are a lot of emails about the smoke control  
23 system, for example, that were being --

24 A. 90?

25 Q. Not all about the smoke control, there is some on the

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1 cladding, there is the smoke control system, there is  
2 advice continuing to be provided.

3 Let's move on.

4 Did you ever question why you were being asked so  
5 many times to give advice?

6 A. I didn't think it was a large number of times, to be  
7 honest.

8 Q. Okay. So did you ever question why you were being asked  
9 for advice but you were not embedded within the design  
10 team at this time?

11 A. No, I didn't ask that question, no.

12 Q. Did that ring any alarm bells for you, that you were  
13 providing advice but you weren't looped into the  
14 day-to-day work of the design team? Was that concerning  
15 for you?

16 A. It wasn't concerning for me in the sense that the  
17 questions that were put forward were reasonably  
18 straightforward.

19 Q. Can we go to the minutes from the contractor induction  
20 meeting on 4 April 2014 at paragraph 5.3 on page 4  
21 {ART00002255/4}. This wasn't a meeting that you were  
22 at. It's recorded, 5.3:

23 "Exova completed the fire strategy at tender stage.  
24 They have not been novated, but SL [Simon Lawrence] will  
25 contact them with the view of using them going forward."

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1 Do you see that there?

2 A. I do, yes.

3 Q. Did Simon Lawrence or anyone else at Rydon ever approach  
4 you with a view to instructing you on the project?

5 A. No, never.

6 Q. Were you surprised that you were not approached to  
7 provide advice pursuant to a contract with Rydon during  
8 this post-contract phase?

9 A. No, because, as I said earlier, once Rydon had been  
10 appointed and we had no contact from them, I had assumed  
11 that that was it. As I said earlier, the design and  
12 build contractors frequently use their own consultants.

13 Q. I just want to have a look at some of the emails that  
14 you sent during the period you were providing some  
15 advice on the project.

16 I want to start with an email of 25 October 2013.  
17 Can we go to {SEA00000121}. If we look at this, this is  
18 an email from Mr Sounes to John Allen and Paul Hanson of  
19 RBKC Building Control, and you are cc'd into that, do  
20 you see that there?

21 A. I do, yes.

22 Q. In the first paragraph it says:

23 "Further to our meeting at RBKC on 17 August we are  
24 now in a position to forward your our proposed fire  
25 strategy for Grenfell Tower for comment. Please see

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1 attached fire strategy drawings, strategy document from  
2 Exova and a description of the proposed upgrade to the  
3 smoke exhaust system."

4 Do you see that?

5 A. Yes, I do.

6 Q. We can see from the documents list that is attached  
7 below -- there is a heading "Documents attached" -- it's  
8 got various plans, sections, and then it says, the final  
9 item on the list, "Grenfell Tower - OFSS". Do you see  
10 that?

11 A. Yes.

12 Q. "Iss 02", issue 2, do you see that there?

13 A. Yeah.

14 Q. Then the email concludes with reference to a number of  
15 other issues that needed to be discussed. So it says:

16 "There are a number of other issues in dealing with  
17 this refurbishment that need to be discussed and this is  
18 probably best done in person once you have had a chance  
19 to study the documents. Would you be able to advise  
20 availability ..."

21 Et cetera, et cetera.

22 Now, the email refers to a meeting of  
23 17 August 2013. Do you recall attending that meeting?

24 A. No, I don't recall, but I'm sure I did, if they said  
25 I did.

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1 Q. When you were copied in to this email, do you recall  
 2 knowing what the other issues were that needed to be  
 3 discussed that are being referred to at the end by  
 4 Mr Sounes?  
 5 A. No.  
 6 Q. Do you know now what he might have been referring to  
 7 there?  
 8 A. No, not even now.  
 9 Q. Now, there is a response from Building Control copying  
 10 you in on 11 November 2013, [RBK00002985]. This is  
 11 a response from John Allen of RBKC Building Control.  
 12 A. Yeah.  
 13 Q. We can see from the first sentence of that that  
 14 Building Control were saying that the information  
 15 submitted so far was not adequate to enable an effective  
 16 consultation with the fire authority. Do you see that  
 17 there?  
 18 A. Yes, indeed.  
 19 Q. It seems clear from the rest of the email that the  
 20 concerns focused around the smoke control system.  
 21 A. Yes.  
 22 Q. Is that correct?  
 23 A. Yeah.  
 24 Q. Is that your understanding at the time?  
 25 A. That is my understanding.

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1 Q. Yes.  
 2 The email suggests in the fourth paragraph that  
 3 a letter should be written. It says:  
 4 "A letter needs to be written that can be forwarded  
 5 to the fire authority that presents information on the  
 6 existing smoke extract system (Design and performance)  
 7 and the proposed replacement system."  
 8 To your knowledge, was that letter ever written?  
 9 A. I've no idea, as it was Max Fordham's responsibility,  
 10 I'm not sure whether it went or not.  
 11 Q. I see. So you don't know what happened about addressing  
 12 it in a letter?  
 13 A. No. No.  
 14 Q. Did you understand at the time you saw this what it was  
 15 that was inadequate in the information that had been  
 16 provided at the time?  
 17 A. I'm sorry, could you repeat that?  
 18 Q. Did you understand what it was that was inadequate in  
 19 the information that had been provided at this time?  
 20 A. I read that to mean that they were not satisfied that we  
 21 had put forward a smoke ventilation strategy which they  
 22 could reasonably send to the Fire Brigade for comment.  
 23 Q. Can we go to paragraph 5.3 of your witness statement.  
 24 This is at [EXO00001621/12]. You are dealing with this  
 25 email there, you say:

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1 "On 11 November 2013, John Allen of RBKC emailed  
 2 Mr Sounes, copying me, stating that RBKC did not think  
 3 that the information submitted so far was adequate to  
 4 enable an effective consultation with the fire  
 5 authority. The email stated that 'the question that  
 6 needs to be proposed to the Brigade is whether the  
 7 replacement smoke extract system to the residential  
 8 parts will be acceptable'. I do not know what was sent  
 9 to RBKC prior to this email. The points in the email  
 10 relate to Max Fordham's work in designing the smoke  
 11 extract ventilation system, not to Exova's work."  
 12 Do you see that there?  
 13 A. Yes, I do.  
 14 Q. We saw from the email, and we specifically looked at it  
 15 a moment ago, that what had been sent to RBKC, to which  
 16 you were copied in, was issue 2 of your outline fire  
 17 safety strategy.  
 18 A. Yes, but I don't think that relates to John Allen's  
 19 concerns. John Allen's concerns were specifically  
 20 related to the smoke extract system.  
 21 Q. Yes, but part of the information they had received,  
 22 which they obviously didn't find adequate, was your  
 23 outline fire safety strategy.  
 24 A. I'm sorry, you're inferring that that was the case.  
 25 I didn't read it that way at all. I didn't think that

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1 our report -- they never said to us that our report was  
 2 inadequate.  
 3 Q. I see.  
 4 A. The concern they specifically had was they couldn't send  
 5 it to the Brigade without answering specific questions  
 6 on the performance of the smoke extract system.  
 7 Q. Were you at all concerned at this stage that you hadn't  
 8 given sufficient advice to enable an effective  
 9 consultation with the fire authority?  
 10 A. No, I wasn't.  
 11 Q. Did you notice that only issue 2 of your outline fire  
 12 safety strategy had been provided to RBKC  
 13 Building Control?  
 14 A. I did note that, but as we've already established, there  
 15 was not an awful lot of difference between 2 and 3.  
 16 2 still contained the fundamental proposals in relation  
 17 to the internal alterations.  
 18 Q. Did you ever think about sending them issue 3 so that  
 19 they had the most recent version?  
 20 A. Not at that point.  
 21 Q. Did you ever do a response to RBKC's email?  
 22 A. No, it wasn't addressed to me specifically. It was  
 23 addressed to Bruce Sounes, I think. Or certainly  
 24 Studio E.  
 25 MS GRANGE: Perhaps I can just, Mr Chairman, finish this

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1 small topic. It's just a page and a bit of notes, if  
 2 I can be allowed.  
 3 SIR MARTIN MOORE-BICK: Five minutes?  
 4 MS GRANGE: That would be great.  
 5 So if we go to {EXO00000653}, at the bottom of  
 6 page 1, it's 15 January, from you to Duncan Campbell at  
 7 Max Fordham and Phillip Booth, do you see that there?  
 8 A. Yes, I do, yes.  
 9 Q. The subject is "Lobby Smoke Venting", so this is a few  
 10 months on from the correspondence we were just looking  
 11 at. If we can read that, you say:  
 12 "Duncan  
 13 "It would be possible to carry out a CFD analysis  
 14 which compared a base case (a code compliant scheme with  
 15 an automatic opening vent 1.5m2 in area located on one  
 16 side of the lift lobby) with what we are proposing but  
 17 we haven't budgeted for this analysis and the cost might  
 18 be more than measuring the flow rates provided by the  
 19 existing system. Given that what we are proposing is a  
 20 significant improvement over what exists, I [think] RBKC  
 21 are being unreasonable.  
 22 "However, we still need to satisfy ourselves that  
 23 the LFEPA won't 'reject' the system under the RRO.  
 24 Therefore, it is imperative that RBKC consults the  
 25 latter for a view. Should we (collectively) have

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1 another go at RBKC?  
 2 "Kind regards  
 3 "Terry."  
 4 Do you see that there?  
 5 A. I do, yes.  
 6 Q. It does appear from that email that you are seeing  
 7 yourself as part of the team that is trying to persuade  
 8 RBKC that this smoke control proposal is acceptable; is  
 9 that not a fair reading of that?  
 10 A. Well, I think to just ignore all of these emails would  
 11 not have been very helpful to the design team.  
 12 Q. Is it right that you are encouraging the design team to  
 13 have another go to ensure that the system is not  
 14 rejected by the London Fire and Emergency Planning  
 15 Authority?  
 16 A. I think, yes, I think that's correct, that was the  
 17 correct thing to do. I mean, we had to get a resolution  
 18 to this.  
 19 Q. This situation had been going on over a prolonged  
 20 period, as we have seen. You had been made aware on  
 21 11 November 2013 that the Building Control officer felt  
 22 he had not been provided with sufficient information to  
 23 have an effective consultation.  
 24 Would you agree -- I'm going to put this to you --  
 25 that, with hindsight, you should have been focused on

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1 ways to improve the system as opposed to trying to get  
 2 it past the fire authority and RBKC Building Control?  
 3 A. No, I think that it was generally accepted -- and I've  
 4 said this several times over the last couple of days --  
 5 that the natural ventilation system wouldn't work and  
 6 that it had to be made a mechanical system to have any  
 7 prospect of improving the situation.  
 8 The subtle difference between just making it  
 9 mechanical or doing one which had been verified by a CFD  
 10 analysis is that RBKC may, in conjunction with the LFB,  
 11 have been prepared to accept something which improved it  
 12 but didn't amount to a scheme which meets current  
 13 standards.  
 14 Q. I see.  
 15 A. If that's clear. I mean, there are two ways of doing  
 16 this: you either put in a code compliant scheme and you  
 17 have to justify that by comparing it to what would have  
 18 been done naturally, or you say, "Well, look, we are  
 19 going to put a fan at the top of the shaft and extract  
 20 the smoke from there, will that suffice?" That would be  
 21 a quantum improvement in the arrangements anyway.  
 22 Q. Would you agree that you should have been warning the  
 23 client, the TMO, and/or Studio E that the proposed  
 24 ventilation system was unsatisfactory?  
 25 A. I think the client already knew that, but, as I said

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1 earlier -- and I don't want to sort of avoid answering  
 2 your question directly -- it was Max Fordham's job to  
 3 deal with the smoke extract system. We would merely  
 4 assist them in that process.  
 5 Q. Was there a policy within Exova at the time which would  
 6 have governed the circumstances in which such a warning,  
 7 about the system being unsatisfactory, should be given?  
 8 Was there any policy?  
 9 A. Not specifically, no.  
 10 MS GRANGE: Mr Chairman, that is a really good moment to  
 11 stop.  
 12 SIR MARTIN MOORE-BICK: Good. Well, you have done well to  
 13 keep it within five minutes.  
 14 MS GRANGE: Thank you.  
 15 SIR MARTIN MOORE-BICK: Right, well, we're going to break at  
 16 that point, Mr Ashton, for the afternoon. I am afraid  
 17 we are going to have to ask you to come back for a few  
 18 more questions tomorrow.  
 19 THE WITNESS: Yes, indeed.  
 20 SIR MARTIN MOORE-BICK: But, for the time being, you are  
 21 free to go. Please don't talk to anyone about your  
 22 evidence while you're away from the room.  
 23 THE WITNESS: Okay, thank you.  
 24 SIR MARTIN MOORE-BICK: And we will resume at 10 o'clock  
 25 tomorrow morning, please. Thank you very much.

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1 (Pause) 203  
2 Good, thank you. 10 o'clock tomorrow, please.  
3 MS GRANGE: Thank you.  
4 (4.05 pm)  
5 (The hearing adjourned until 10 am on Thursday, 9 July 2020)

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