

Tuesday, 29 January 2013

1

2 (10.00 am)

3 THE CORONER: Thank you, good morning.

4 Yes, Mr Maxwell-Scott, we have Miss Queen Ogbeifun
5 first; is that right?

6 MR MAXWELL-SCOTT: We might do Mr Kayode first.

7 THE CORONER: All right.

8 MR MAXWELL-SCOTT: He has a video.

9 THE CORONER: Okay.

10 MR MAXWELL-SCOTT: A short video which he refers to in his
11 statement. It may be least disruptive to play it
12 straight away.

13 THE CORONER: Yes.

14 MR MAXWELL-SCOTT: As soon as the jury are in court.

15 THE CORONER: Okay. It's ready to go, is it?

16 MR MAXWELL-SCOTT: Hopefully.

17 THE CORONER: Well, if we ask the jury to come in, is that
18 time enough to get it ready?

19 MR MAXWELL-SCOTT: It's ready to go.

20 THE CORONER: Right. Okay, yes, please could we ask the
21 jury to come in. Mr Edwards, are you ready to proceed?

22 MR EDWARDS: Yes.

23 (In the presence of the Jury)

24 THE CORONER: Yes, good morning, members of the jury. Today
25 we're going to have evidence from two former residents

1 of Lakanal House and then from three firefighters. So
2 the first witness will be Mr Kayode. Are you in court,
3 please, Mr Kayode? Thank you.

4 ROBERT KAYODE (sworn)

5 THE CORONER: Thank you, Mr Kayode. Do sit down. The
6 microphone in front of you is switched on, but you need
7 to be quite close to it for it to amplify your voice, so
8 please could you make sure you keep your voice up and
9 try to speak into the microphone. All right? That
10 would be very helpful. Thank you very much. I must
11 apologise because I believe you came last week --

12 A. Yeah.

13 THE CORONER: -- and we weren't able to get to your evidence
14 in time. I'm so sorry you had a wasted journey.

15 A. That's all right.

16 THE CORONER: But thank you very much for coming today.

17 Mr Maxwell-Scott, who is standing up, is going to begin
18 by asking you questions on my behalf and then there may
19 be questions from others.

20 A. Okay.

21 THE CORONER: All right? Thank you.

22 A. Thank you.

23 Questions by MR MAXWELL-SCOTT

24 MR MAXWELL-SCOTT: Good morning, Mr Kayode. Can you give
25 the court your full name, please.

1 A. My name is Robert Alela Kayode.

2 Q. I'm going to ask you some general questions about your
3 knowledge of Lakanal House and then some questions about
4 your experience of the fire on 3 July 2009.

5 A. Okay.

6 Q. Before I do that, though, I believe that you took
7 a short video clip at the time of the fire on your
8 mobile phone?

9 A. Yeah.

10 Q. What I'm going to do is ask for it to be played on the
11 big screen and on the monitors so that we can find out
12 at the outset whether, as far as you remember, this is
13 the footage that you took.

14 A. Okay.

15 (The video was played to the Court)

16 Q. Does that refresh your memory? Is that the footage that
17 you took?

18 A. Yeah, yeah.

19 Q. Thank you. We'll come back to that later. Firstly some
20 general questions not about the day of the fire itself.
21 We're hearing evidence from at least ten people who were
22 residents of Lakanal House at the time of the fire, and
23 we'd like to ask each of them essentially the same
24 questions about their awareness of fire safety advice
25 and of the layout of the building, so that we can build

1 up a picture of what residents knew at the time.

2 A. Okay.

3 Q. So firstly in relation to fire safety advice, if you
4 could have a look at page 1050 in the advocates' bundles
5 at file 3. (Handed) This is the first page of
6 a four-page London Fire Brigade leaflet. What I'd like
7 you to do, taking as much time as you need, is to look
8 at the four pages of it, finishing on 1053, and then ask
9 yourself whether you recognise it, whether you think
10 you've seen it before or not. (Pause)

11 A. Yeah.

12 Q. You do recognise it?

13 A. Yeah.

14 Q. Thank you. Is that something that you recognise as
15 having seen some time before the fire in July 2009?

16 A. No.

17 Q. You think you've seen it more recently?

18 A. Yeah.

19 Q. Okay. Thank you. Then if you look at page 1054. This
20 is the first page of a two-page document and if you look
21 at both pages of it in your own time. It's the same
22 question: do you think you recognise it? Do you think
23 you had seen it before or not?

24 A. No, don't recognise it.

25 Q. Thank you. Then if you move on in the same file to

1 page 1068.

2 A. Yeah.

3 Q. You'll see in the bottom right-hand corner the number
4 27.

5 A. Yeah.

6 Q. So this is part of a longer document, and what we have
7 here for you to have a look at is this page, the next
8 page, and finally a third page, which has a number 29 in
9 the bottom of it.

10 A. Okay.

11 Q. It's the same question. Taking as long as you need, see
12 whether you think you recognise it, whether you think
13 you've seen it before or not. (Pause)

14 A. Yeah, okay.

15 Q. You do recognise it?

16 A. Yeah.

17 Q. Do you remember where you had seen it before, or in what
18 context?

19 A. I've seen it in places but not in the building.

20 THE CORONER: Mr Kayode, can you speak more closely.

21 A. I've seen it in places, but not in the building. That
22 wasn't in the building but I've seen it in other places.

23 MR MAXWELL-SCOTT: Okay, thank you. Before the fire
24 in July 2009, had you ever, for any reason, had a look
25 at the London Fire Brigade's website for fire safety

1 advice?

2 A. I've looked at it 'cos I'm -- I did health and safety --
3 I studied health and safety and I went to the website,
4 and I actually studied about the Fire Brigade when I did
5 my health and safety diploma.

6 THE CORONER: Mr Kayode, I'm not hearing very well what you
7 saying, so when you're answering the questions, instead
8 of looking at Mr Maxwell-Scott if you could look across
9 to the jurors, and that will help them to hear what
10 you're saying. And could you speak slowly because the
11 typists are making a transcription and they need to be
12 able to follow what you're saying.

13 A. All right.

14 THE CORONER: So if you would speak loudly and slowly and
15 clearly, please.

16 A. Okay.

17 THE CORONER: I didn't follow what you were saying about
18 whether you had looked at the website. Could you repeat
19 what you said, please?

20 A. Yeah, I said I've been to the Fire Brigade website.
21 I said I studied health and safety, I did my diploma in
22 health and safety, and through that I always go to the
23 website and study more about the Fire Brigade.

24 THE CORONER: Thank you.

25 MR MAXWELL-SCOTT: When you lived at Lakanal House, did you

1 ever receive what's called a home fire safety visit,
2 which is when a firefighter comes and visits your flat
3 to give you some health and safety, fire safety advice,
4 not because there's a fire at the time?

5 A. No.

6 Q. I'm going to move on now and ask you about your
7 knowledge of some features of Lakanal House. Back
8 in July 2009, how long had you lived there for?

9 A. It was April 1997 that I moved in the building -- into
10 the building.

11 Q. So 12 years?

12 A. Yeah.

13 Q. Do you remember how many floors there were in the
14 building?

15 A. Yeah, there are 13 floors.

16 Q. Did you know how many flats there were in the building?

17 A. 99? I'm not that (Inaudible) about it but I think
18 there's 99 flats or so.

19 Q. Were you aware that all the flats were essentially
20 identical in layout?

21 A. Yeah, yeah, I was aware.

22 Q. Did you have a feel for where individual flat numbers
23 were in the building? So for example, if you met
24 somebody outside the building, and they said, "I'm
25 trying to get to flat 85", would you have been able to

1 give them any assistance in how to get there?

2 A. Yes, I -- I can, yeah. Initially, it was not --

3 initially there was -- it was difficult to tell people

4 where the flats were because normally on tall buildings,

5 when you get to the lift they put numbers there and it

6 would be easy for you to tell them where the flat is --

7 where the flats are, but on this particular building

8 there was -- the numbers were not there for a long time.

9 Then later on I think the council put it there.

10 Q. Let me show you a photograph of what I think you're

11 referring to. This is photograph 7, and it shows the

12 area at ground floor level where the two lifts were. Do

13 you see in that there's a sign above the two lifts?

14 A. Yeah, yeah.

15 Q. Is that what you were referring to?

16 A. Yeah, it was not there for a long time.

17 Q. But by the time of the fire they were there?

18 A. Yeah.

19 Q. Photograph 8 shows a close-up of that.

20 A. Yeah.

21 Q. And you knew that sign was there in July 2009?

22 A. Yeah.

23 Q. Turning, then, to ask you about your knowledge of

24 features of your flat itself, you'll remember,

25 I imagine, that on the upper floor, the flat extended

1 across the width of the building, so you had windows

2 looking out either side of the building?

3 A. Yeah.

4 Q. Do you remember that there were doors that led on one
5 side from a kitchen to a balcony and on the other side
6 from a lounge to the balcony?

7 A. Yes, yeah.

8 Q. Let me show you a photograph of one of those balconies.
9 You see the balcony there with a door at the end of it,
10 photo 36. Photo 38 is looking in the other direction.
11 There's a wall at the end that doesn't lead anywhere.
12 There's no door. Photograph 37 is a close-up view of
13 the door we saw in photo 36. Did you know where that
14 door went?

15 A. No.

16 Q. Do I assume from that that you'd never been through one
17 of those doors?

18 A. Yeah, I've never been through one of them.

19 Q. Did you know, or have any view on, what the purpose of
20 the balconies and that door were?

21 A. Yeah, I knew it was for a fire -- I mean for a fire
22 escape, but I've never used it before.

23 Q. Thank you.

24 I'm turning now to your experience of the fire on
25 3 July 2009. Which flat were you living in at the time?

1 A. 66.

2 Q. On the 9th floor?

3 A. The 9th floor, yeah.

4 Q. With a front door opposite flat 65?

5 A. Yeah.

6 Q. On the afternoon of the fire, who was with you in your
7 flat?

8 A. My little boy.

9 Q. How old was he at the time?

10 A. Seven months. About seven months.

11 Q. Did there come a time when you noticed something
12 unusual?

13 A. Oh, yeah.

14 Q. What was it?

15 A. That afternoon, I told my wife to go and pick my senior
16 daughter at school, so she left to go and pick the -- my
17 daughter at school, and I -- I put my seven-month-old
18 boy in the cot in the building, then I went into the
19 bathroom and I was having a bath. Then I smelt
20 something, something like burning rubber, something
21 black -- I mean, I smelt something burning and then --

22 Q. After you smelt it, what did you do?

23 A. I got out of the bathroom and I went upstairs.
24 I thought that my wife left something on the cooker.
25 But when I went there, there was nothing. And then

1 I went back to the bathroom, I continued having my bath,
2 and then the smell was getting thicker. It was getting
3 a bit (Inaudible). So I got out of the bath and then
4 I went down to -- I opened the window, because I knew
5 what happened two years before that time, the 11th
6 floor. There's a flat on the 11th -- on the 11th floor
7 that caught fire and I knew the smell. I -- I mean,
8 I knew how it smelt that time.

9 Q. Just pausing there, you recognised that the smell was of
10 a flat on fire?

11 A. Yeah like burning -- like burning -- you know like
12 a burning tyre, something like that. Black rubber.

13 Q. You mentioned a moment ago looking from a window?

14 A. Yeah.

15 Q. Can you remember where you were when you looked out of
16 the window?

17 A. I think -- I think it was the bedroom window, the
18 bedroom window next to the flat that was burning.

19 Q. So the bedroom window would have looked out over the
20 east side of the building?

21 A. Yeah, it was towards my right, yeah.

22 Q. What did you see?

23 A. When I opened the -- the curtain, I saw black smoke
24 coming out of the window next to mine.

25 Q. What did you do next?

1 A. What I just did is I just wrap my boy, 'cos -- I took
2 him from the cot, I dressed up and wrapped him up and
3 that was it. When I wrapped him I put his face towards
4 my chest. I opened the door, and I just went through
5 the stairs. I ran down -- I went down all the nine --
6 you know, I was on the 9th floor, so I had to --

7 Q. I'm just going to pause you there. So you've described
8 picking up your baby son.

9 A. Yes.

10 Q. At what point did you decide that what you wanted to do
11 was leave the building?

12 A. To be honest, I was there two years earlier on when the
13 11th floor -- there was a flat on the 11th floor that
14 caught fire then, and I knew what happened, and I said,
15 "Look, I'm not going to stay in the building one more
16 second." So I got my boy, wrapped him up, put his
17 chest --

18 Q. So you made a decision you wanted to leave the building?

19 A. Yeah.

20 Q. The records that we have indicate that you telephoned
21 999 --

22 A. That was when I came out of the building.

23 Q. I'll just give you the time of that -- at 16.21.34.

24 A. Okay.

25 Q. Can you remember where you were when you called 999?

1 A. I think I was outside the building, actually.

2 Q. Do you remember making a statement about your experience
3 of the fire a few days afterwards?

4 A. Yeah, yeah.

5 Q. That was on 9 July 2009. Do you think your memory at
6 that time was better than it is now, some three and
7 a half years later?

8 A. To be honest, I will remember here. I will.

9 Q. I'll ask if you can be shown your statement, which is at
10 page 58 of the statements bundle. (Handed) Do you
11 recognise that as your statement?

12 A. Yeah.

13 Q. Just take a moment to have a look at it. Then if you
14 turn over the page and look by way of where the first
15 holepunch is, on the right side of the page, do you see
16 it then says:

17 "I then dialled 999."

18 A. Yeah.

19 Q. It says:

20 "I then dialled 999 from my phone number [and you
21 give the number], asked for the Fire Brigade, telling
22 them of the fire and giving them the location. I then
23 opened my front door."

24 Does that help you at all to remember where you were
25 when you dialled 999?

1 A. What I can remember is I wrapped my boy up and made my
2 way down the stairs, and then after then I called the
3 Fire Brigade.

4 Q. If you could be shown advocates' bundle file 2,
5 page 732, please. (Handed)

6 Just to explain what this is, the practice is that
7 999 calls are tape-recorded. That means it's possible
8 then to type up what was said after the event. Call 5
9 here, as we understand it, is a typed-up version of what
10 you said in your 999 call. On that page, in the middle
11 of the page, firstly you're recorded as saying:

12 "Yeah, hello, there's a fire burning on top of my
13 flat."

14 Then you went on to say that you were on the 9th
15 floor --

16 A. Yeah.

17 Q. -- and the house was burning on the 11th floor. Then
18 over the page, there is a discussion about trying to get
19 the address right, get the street name right, and then
20 over the page again, coming to the end of the call, the
21 operator asks you:

22 "We are on our way. Can you get out all right?"

23 And you said:

24 "Thank you, yes, I'm talking outside the house now."

25 A. Yes.

1 Q. Can you remember whether, at the end of the call, you
2 were outside your flat but inside the building, or
3 whether you were outside the building completely, at
4 ground floor level?

5 A. Yeah, I was outside the building completely.

6 Q. As far as you remember, were you walking, using your
7 mobile phone while making the 999 call?

8 A. No.

9 Q. So your recollection is that you didn't call 999 until
10 you got out of the building; is that right?

11 A. Yeah, correct.

12 Q. Just going back to what you said about that in your
13 statement on 9 July 2009. You referred to dialling 999
14 and the statement said:

15 "I then opened my front door. As soon as I did
16 this, smoke entered my flat, setting off the two smoke
17 alarms."

18 Then you describe making your way out of the
19 building. But you don't think that's exactly correct?
20 You think you didn't phone 999 until you were outside;
21 is that right?

22 A. Yeah, I called 999 when I was outside.

23 Q. Can you tell us, as best you remember, to what extent
24 there was smoke in the corridor and on the stairs as you
25 made your way out of the building?

1 A. Yeah, as my -- my flat is next to the -- the flat that
2 was on fire, so when I wrapped my boy up, put his head
3 towards my chest, I opened my front door and then
4 I noticed the whole corridor was full -- was filled up
5 with black smoke, and then -- the smoke now came into
6 the house and all the smoke alarms went off. I closed
7 the door. There's another door before you get to the
8 stairs. I opened that door, and the staircase was full
9 of smoke. It was difficult to see the stairs. To be
10 honest, if you were not living in the building, you
11 wouldn't know about -- you wouldn't know where the
12 stairs were and how to get down, but because I've lived
13 there for so long and I've used it a couple of times
14 when the lift locked down, so I knew how to -- where to
15 hold and run all the way down to the bottom of the
16 building.

17 Q. If I can just pause you there, as you were making your
18 way down the stairs, was it equally smokey all the way
19 to the bottom, or did it change?

20 A. Yeah, the -- the staircase was full of the smoke, so you
21 could not -- I could only hear people shouting. I could
22 not see the faces because of how thick it was.

23 Q. Just on that point, for completeness, if I can just
24 refer you to what you said in your statement at page 59,
25 by the lower of the two hole punches, and what you said

1 in July 2009 was:

2 "As I got to the bottom of the stairs, I began to

3 notice that the smoke was not as dense and I could

4 breathe a bit easier."

5 A. At the bottom, yeah, but not at the top.

6 Q. Thank you.

7 A. Yeah.

8 Q. Coming out at the bottom of the stairs would have

9 brought you out on the east side of the building. What

10 did you do when you got out?

11 A. I just went out of the building. I didn't look

12 backwards until I was clear of the building, and then

13 I made the call.

14 Q. Are you able to say whether any fire engines had arrived

15 at the time that you got out of the building?

16 A. No, there was -- I was hearing the siren but there was

17 no fire engine at the building at that time.

18 Q. So is what you're saying you could hear fire engines on

19 their way?

20 A. Yes, I didn't know whether they were, like, the police

21 or the ambulance, but there was no -- there was no --

22 there were no fire engines at the property at that time

23 when I got down. When I came out of the building, there

24 was none.

25 Q. But you could hear sirens?

1 A. Yeah.

2 Q. The mobile phone video footage that you took and we
3 looked at on the screen, do you remember how soon after
4 you came out of the building that you took that?

5 A. Yeah, it was immediately after I came out of the
6 building that I took it.

7 Q. Our understanding of the properties of the file that you
8 have provided is that it appears to give a time of
9 1720 hours. That's obviously not correct?

10 A. Yeah.

11 Q. I was wondering whether it might have been an hour
12 earlier, 16.27, or are you not able to help?

13 A. Yeah, I had it on two or three different clips on my
14 phone. I recorded it about two or three times,
15 different times, so I think I gave one of the --
16 I think the chip, one of the -- to the police officer.

17 Q. But your best recollection is that you took it shortly
18 after you came out of the building?

19 A. Yeah, I took it about -- yeah, at about that time.

20 Q. Did you remain in the area of the building and see fire
21 engines arrive and firefighters enter the building?

22 A. When I was outside, then the firemen just started coming
23 in. There were -- there were a lot.

24 Q. For how long did you remain in the area of Lakanal House
25 after you had got out of the building?

1 A. I was there for a long time.

2 Q. Did any member of the emergency services speak to you or
3 ask you any questions whilst you were standing outside
4 the building?

5 A. No.

6 Q. Thank you very much. Those are my questions, but others
7 may have some questions.

8 A. Okay.

9 MR EDWARDS: No questions, thank you.

10 Questions by MS AL TAI

11 MS AL TAI: Good morning, Mr Kayode.

12 A. Good morning.

13 Q. I act on behalf of one of the bereaved. Just briefly,
14 I have one question for you: in response to a question
15 you were asked earlier, you responded that you had left
16 the building because a few years prior you were in the
17 building when a fire had occurred and you realised you
18 weren't going to stay in the building one second more.
19 Can you explain to us what you mean by that, please?

20 A. Yeah. Two years earlier on, there was a flat on the
21 11th floor that caught fire and -- just like what
22 happened on my floor. I looked up and there was black
23 smoke boiling out of the window and I ran downstairs at
24 that time. You know, I've read a lot of things on the
25 internet concerning buildings. When buildings are on

1 fire, you cannot use the lift and all that. So I made
2 up my mind that I'm not going to stay in the building,
3 that I'm going to leave the building.

4 Q. Thank you very much, Mr Kayode.

5 THE CORONER: Mr Walsh?

6 Questions by MR WALSH

7 MR WALSH: You mentioned that there was a fire a couple of
8 years earlier.

9 A. Yeah.

10 Q. I think we'll hear evidence in due course that there was
11 a fire on the 11th floor, but it was many years ago. It
12 was 1997 that there was a fire.

13 A. No, two years earlier when -- the one that happened in
14 2009? It was two years earlier. I think it was 2007.

15 Q. Do you remember a fire then?

16 A. Yeah, yeah, there was a flat on the 11th floor that
17 caught fire.

18 Q. Thank you very much. I just want to clarify the time of
19 your telephone call when you called 999. I don't need
20 to take you to documents.

21 A. Okay.

22 Q. We have it in page 1 of the sequence of events. Do you
23 agree this: the time of your 999 call was 16.21.34. So
24 that's the timing that's recorded for it. Would you
25 agree with that?

1 A. Yeah, I read it, yeah. I can't remember the time now.

2 It's been a long.

3 THE CORONER: It was 16.27, Mr Maxwell-Scott said.

4 MR MAXWELL-SCOTT: It was 16.21, and the video footage
5 facing the property said 17.27.

6 THE CORONER: Yes, thank you. Sorry, that's muddled
7 everybody. Apologies for that. Thank you, yes.

8 Questions by the Jury

9 THE FOREMAN OF THE JURY: Thank you, madam coroner. We just
10 have one question. The gentleman says he has two smoke
11 alarms in his flat and we were just wondering whether
12 they were fitted by himself or the council.

13 THE CORONER: Could you answer that please, Mr Kayode?

14 A. Please repeat?

15 THE FOREMAN OF THE JURY: You said you had two smoke alarms
16 in your flat that went off when the smoke came in. Were
17 those fitted by yourself or by the council?

18 A. It was fitted by the council.

19 THE FOREMAN OF THE JURY: Both of them?

20 A. Yeah, two of them.

21 THE FOREMAN OF THE JURY: Thank you very much.

22 THE CORONER: Mr Kayode, thank you very much and thank you
23 for the evidence that you've given to us. You're
24 welcome to stay if want to, but you're free to go if you
25 would prefer. Thank you very much.

1 A. Thank you.

2 (The witness withdrew)

3 THE CORONER: Yes.

4 MR MAXWELL-SCOTT: Madam, the next witness is Queen

5 Ogbeifun.

6 THE CORONER: Yes. Miss Ogbeifun, are you in court? Would

7 you like to come forward, please.

8 QUEEN OGBEIFUN (sworn)

9 THE CORONER: Thank you very much, Miss Ogbeifun. Do sit

10 down. Do have a glass of water if you would like.

11 You've probably heard me say to Mr Kayode that we do

12 need to be able to hear your evidence, so please if you

13 could speak up and speak clearly and speak close to the

14 microphone, that would be helpful.

15 A. Okay.

16 THE CORONER: If you direct your answers across the room to

17 the jurors, then that will help them to hear your

18 evidence and also help you to keep close to the

19 microphone.

20 A. Okay.

21 THE CORONER: Mr Maxwell-Scott is standing, and he is going

22 to begin by asking you some questions on my behalf.

23 Then there may be some questions from others.

24 A. Right, thank you.

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Questions by MR MAXWELL-SCOTT

MR MAXWELL-SCOTT: Can you give the court your full name, please?

A. Yeah, my name is Queen Ogbeifun.

Q. As with the previous witness, I'm going to ask you some general questions about your knowledge of Lakanal House and then some questions about your experience of the fire on 3 July 2009. As you heard me say to him, we're hearing evidence from at least ten people who were residents of Lakanal House at the time of the fire.

A. Okay.

Q. We'd like to ask each of them essentially the same questions about their awareness of fire safety advice and of the layout of the building, so that we can build up a picture of residents' understanding.

Firstly on fire safety advice, if you could be shown the document that starts at page 1050 in file 3 of the advocates' bundles. (Handed) It's a four-page London Fire Brigade leaflet, starting on that page and going through to page 1053. What I'd like you to do is, taking your time, see whether you recognise it, whether you've seen it before.

A. Yes, I've seen them before.

Q. Do you remember whether you'd seen that since the fire at Lakanal House, or if you'd seen it before?

1 A. I've seen them before.

2 Q. Thank you. Then at page 1054 is the first page of
3 a two-page document. If you look at both pages of it,
4 again, taking as much time as you need, ask yourself the
5 same question: do you recognise it?

6 A. Yes, I do.

7 Q. Do you think that you had seen that before the fire
8 in July 2009?

9 A. Yes.

10 Q. Thank you. Then if you look on in the same bundle to
11 page 1068. You'll see in the bottom right hand corner
12 there's a number 27, so this comes from a longer
13 document, and I'd like you to look at three pages of it:
14 this page, the next page and finally this page, with the
15 number 29 in the bottom right-hand corner.

16 A. Yeah.

17 Q. You recognise that?

18 A. Yes.

19 Q. Do you remember where you've seen that, or in what
20 context?

21 A. The ground floor before you take the lift, and the --
22 the -- the doorbell lead outside, through the kitchen
23 side.

24 Q. Are you talking about inside your flat --

25 A. No.

1 Q. -- or inside the building?

2 A. Inside the building, outside the flat.

3 Q. And this was available in one of the communal areas in
4 the building? Is that your memory?

5 A. Yeah, yeah.

6 Q. Thank you. Do you remember ever receiving what's known
7 as a home fire safety visit, which is where there isn't
8 a fire in your flat but a fireman comes and gives you
9 some fire safety advice?

10 A. No.

11 Q. Thank you. You can put that file away now. I'm going
12 to move on to ask you about your knowledge of some
13 features of Lakanal House. Back in July 2009, do you
14 remember how long you had been living in Lakanal House
15 for?

16 A. About two years plus.

17 Q. About two years?

18 A. Two years plus, yeah.

19 Q. Can you remember how many floors there were in the
20 building?

21 A. I can't remember. Can't remember.

22 Q. Did you know how many flats there were in the building?

23 A. I can't remember.

24 Q. At the time, do you think you were aware that all the
25 flats in the building were essentially identical in

1 layout?

2 A. Yeah.

3 Q. My next question is about the knowledge that you had of
4 where different flats were in the building, so tying
5 different flats to places in the building.

6 A. Okay.

7 Q. So for example, if you had met somebody at ground floor
8 level outside the building who had said, "I'll trying to
9 get to my friend in Flat 32", would you have been able
10 to help them at all and give them some advice and
11 direction as to how to get there?

12 A. Flat 32 is on the left-hand side of the building, but
13 I can't remember the floor.

14 Q. Would you have been able to give them some advice and
15 directions as to how to get there?

16 A. Yeah, by using the lift.

17 Q. Why would using the lift help them to know where to get
18 to?

19 A. Because on the ground floor, it listed the flats -- each
20 flat on various floors, so with the lift you can know
21 the floor you are going and when you get there, the
22 numbers are on -- by the wall.

23 Q. You mentioned a list. Are you referring to a sign in
24 the area where the lifts were?

25 A. Yeah.

1 Q. Let me show you a photograph to try and help you. This
2 is a photograph at ground floor level where the two
3 lifts were.

4 A. Yes.

5 Q. Do you see there's a sign on the wall above the lifts?

6 A. Yeah.

7 Q. Is that what you were thinking of?

8 A. Yeah.

9 Q. Photograph 8 is a close-up view of it. That shows floor
10 numbers and the numbers of flats on individual floors?

11 A. Yeah.

12 Q. Is that what you would have suggested to somebody to use
13 as a guide to how to get somewhere in the building?

14 A. Yes.

15 Q. Thinking now about the layout inside your flat, you will
16 remember, I imagine, that on the upper floor of your
17 flat, the flat extended the whole width of the building,
18 so you had windows looking out at either side?

19 A. Yeah.

20 Q. Do you remember that there were doors on one side
21 leading from the kitchen to a balcony?

22 A. Yeah.

23 Q. And on the other side from a lounge to a balcony?

24 A. Yeah.

25 Q. Let me show you a photo of one of those balconies. This

1 is photo 36. That's taken on a balcony at
2 Lakanal House, looking towards a door. Photograph 38
3 looks in the opposite direction towards a wall at the
4 end. Does that refresh your memory of what the
5 balconies look like?

6 A. Yeah.

7 Q. If we go back to 36, you see the door at the end, and
8 then 37 is a closer up view of the door. Did you know
9 where those doors went?

10 A. No, I never used them before.

11 Q. So you'd never been through?

12 A. No.

13 Q. Did you know what the purpose of the balconies and those
14 doors was?

15 A. No.

16 Q. I'm going to ask you now about your experience on the
17 day of the fire, 3 July 2009. Is it right that you
18 lived at flat 91 on the 13th floor?

19 A. That's right.

20 Q. That afternoon, who were you at home with? Who was in
21 the flat?

22 A. With my two kids.

23 Q. What ages were they at the time?

24 A. My daughter was three years and two months, and my son
25 was five months old.

1 Q. Do you remember what first drew your attention to
2 something unusual?

3 A. Yeah, I was in the toilet that afternoon when my
4 daughter ran down from the living room downstairs, and
5 she said, "Mummy, the TV just trip off", because she was
6 watching a cartoon. And when I opened -- when I came
7 out, I smelt something, and it smells like a wire --
8 electric wire. So I peeked through her room window to
9 see what was going on and I noticed smoke.

10 Q. Just pausing there, when you say you looked through her
11 room --

12 A. Yeah, my daughter room.

13 Q. -- was that a bedroom window?

14 A. Yeah, was a bedroom window.

15 Q. So you would have been looking on the west side of the
16 building?

17 A. Yes.

18 Q. What did you see when you looked out of the window?

19 A. Smoke, and I saw people downstairs, a lot of people
20 downstairs shouting.

21 Q. What did you do next?

22 A. I just quickly grabbed my phone and I dial 999.

23 Q. Just pausing there, if you could be shown the second
24 advocates' bundles at page 754, please. (Handed) You
25 may have heard me explain to the previous witness that

1 the practice is that 999 calls are tape-recorded at the
2 time, so it's possible to type up what was said
3 afterwards.

4 A. Okay.

5 Q. If you look on page 754, it's a typed-up account of
6 a 999 call. Above it, it says "call 17". Don't worry
7 about that for the moment.

8 A. Okay.

9 Q. You see the call begin on page 754, and then, over the
10 page to 755, at the top of the page we see the operator
11 is speaking and says:

12 "Fire Brigade, can I help you, please?"

13 And the caller says:

14 "Yes, there's smoke coming out from 91
15 Lakanal House."

16 A. Yeah.

17 Q. The operator says:

18 "Which house? Lakanal?"

19 The caller says:

20 "Sorry?"

21 Then the operator asks about the street, there's
22 some noise and the caller says:

23 "I can't hear you, love."

24 The operator says:

25 "We're on our way."

1 And the caller says:

2 "Okay, bye."

3 There's a clear reference there to smoke coming out

4 from 91 Lakanal House.

5 A. Yeah.

6 Q. Do you think that that is a call that you made, that

7 you're the caller there?

8 A. Sorry?

9 Q. Do you think that that is your call?

10 A. Yeah.

11 Q. And the records show that that call was made at

12 16.23.15.

13 A. I can't remember the time.

14 Q. I can understand that. After you'd made a call, what

15 did you do?

16 A. 'Cos I was naked, so I quickly put on my jeans trousers

17 and a top. So I tie my little boy on my back and I grab

18 my daughter on my left-hand side. So I grab a towel

19 I wanted to use in the bathroom and cover my son at the

20 back because he's a baby, and I opened the door. I saw

21 my neighbours running out and some say, "Are you still

22 in the building?" I said, "What's going on?" They

23 said, "The building is on fire." So I had to run down

24 and use the stairs.

25 Q. Just pausing there. You said you saw your neighbour in

1 the corridor. Do you remember who that was?

2 A. I can't remember their name. It's two brothers. They

3 live at the extreme end of the same floor with me.

4 Q. So two brothers who lived at the end of your floor?

5 A. Yeah.

6 Q. Was that at the end of your corridor?

7 A. Yeah.

8 Q. Sorry, I interrupted you. What did they say to you?

9 A. They said, "Auntie, are you still in? The building is

10 on fire." So I just -- they ran past me, so I quickly

11 opened the door, and my neighbour, the guy opposite me,

12 he was saying to me: "Oh, go inside. Don't worry. Help

13 is on the way." So I didn't listen to him. I just run

14 out and take my kids, and when I got to the stairs, it

15 was very dark. There was --

16 Q. Just pausing there again, did you mention there talking

17 to another neighbour?

18 A. Yeah, the guy that lives opposite me.

19 Q. Do you remember who that was?

20 A. I don't remember his name. I know he's a Jamaican guy.

21 Q. Jamaican?

22 A. Yeah, he's a (Inaudible) guy.

23 Q. And do you remember which flat he lived in?

24 A. I think 93. He was just opposite me.

25 Q. I think you were going on to say that you started to

1 make your way out of the building?

2 A. Yeah, so I was screaming, "Help, help, help." I was
3 hearing noise, so no-one could come down to help me.

4 Q. Could you have a look in the jury bundle at tab 11,
5 page 1, please. (Handed) You won't have seen that
6 before, but it's a representation of what Lakanal House
7 looks like viewed from the west side of the building.

8 A. Yes.

9 Q. Showing the flat numbers.

10 A. Yeah.

11 Q. If we look at that, you were in flat 91.

12 A. 91, yeah.

13 Q. So you're on the top level of flats.

14 A. Yeah.

15 Q. But you're on the south corridor.

16 A. Yes.

17 Q. You were telling us firstly about two brothers who were
18 at the end of the corridor. Do you mean that they were
19 at the end of the same corridor as you, so in either
20 flat 85 or 86? Or were they on the other side?

21 A. No, on same corridor with me, yeah. At the extreme end
22 of mine.

23 Q. So just looking at the diagram, are you referring to the
24 end where 85 and 86 are, or the end where 97 and 98 are?

25 A. I don't understand the building, sorry.

1 Q. When you were on your corridor, your flat is close to
2 the central staircase?

3 A. Yeah.

4 Q. And in order to get to flats 93 to 98, you would have to
5 go into a lobby area through some doors --

6 A. No.

7 Q. -- and you'd have to go through another set of doors to
8 get onto the north corridor.

9 A. No, no.

10 Q. So what I wanted to know was: the two brothers that you
11 remember, were they on the same corridor as you?

12 A. Yeah.

13 Q. You mentioned a neighbour from flat 93. Now, flat 93 is
14 the other side of the central staircase area.

15 A. No. Maybe I couldn't remember the flat number, but his
16 door is just opposite my door.

17 Q. Opposite you would be 92, looking at this.

18 A. Oh, maybe.

19 Q. So your memory is it was somebody who was across the
20 corridor from you, opposite you?

21 A. Yeah.

22 Q. When you got onto the staircase at the top of it, before
23 you started going down, can you remember whether it was
24 smokey at all?

25 A. Yeah, there was smoke.

1 Q. Did you then walk down the stairs with your two
2 children?

3 A. Yes.

4 Q. Were any other residents coming down with you?

5 A. No, everywhere was so dark so I couldn't see, but I was
6 hearing noise, slamming of doors -- but I couldn't see
7 anyone until I get to the 6th floor and saw the fireman
8 with a torchlight on his head. So that was why we
9 used -- he now assist me with my daughter and we went
10 down the stairs to the ground floor. So we used the
11 back exit.

12 Q. So as you were coming down from the 13th floor --

13 A. Yeah.

14 Q. -- until you met the fireman, you think around the 6th
15 floor, can you tell us whether it was smokey all the way
16 down, or whether it got better --

17 A. It was smokey and I was very hot.

18 Q. Did the smokiness get better at any point as you were
19 getting down?

20 A. No, no.

21 Q. Did you speak to the fireman?

22 A. I just -- I just ask him if he could help me, and he has
23 this torchlight to find my way downstairs with my little
24 girl. Then he moved me away from the building, that was
25 it.

1 Q. Did he turn round and come down part of the way with
2 you?

3 A. Yeah.

4 Q. When you got near the bottom, did the smoke get better?

5 A. When I was outside the building?

6 Q. When you got near the bottom of the stairs.

7 A. Yeah, it was -- it was better.

8 Q. After you had got out of the building, what did you do?

9 A. There was like a small field on the side of the
10 building. People went there, so I just -- I sat down
11 there and I was crying.

12 Q. Did anyone from the emergency services come over and
13 talk to you?

14 A. No.

15 Q. I think it's right that you didn't get any medical
16 assistance or ask for any at the time, but a couple of
17 days later you went to hospital because you had been
18 feeling a little unwell?

19 A. That's true.

20 Q. But as it happened, neither you nor your children
21 suffered any long term problems; is that right?

22 A. No.

23 Q. Thank you very much. Those are my questions. There may
24 be some others.

25 A. Okay.

1 THE CORONER: Mr Walsh.

2 Questions by MR WALSH

3 MR WALSH: I'd just like to ask you some questions about the
4 conditions on the 13th floor.

5 A. Okay.

6 Q. And then the conditions as you went down the stairwell.
7 I'm asking questions on behalf of the Fire Brigade, by
8 the way. We just want some clarification, if you could
9 help. Thank you. As you went down the stairwell --

10 A. Yeah.

11 Q. -- would it be right to say that the smoke conditions
12 and the heat got worse as you went down?

13 A. Yeah, it was worse.

14 Q. So as you got further down, you could feel heat?

15 A. Yeah.

16 Q. Do you remember that?

17 A. That was between the 9th floor to the 7th floor,
18 I think, yeah.

19 Q. Yes, okay. You've told us that you came across
20 a fireman coming up the stairs.

21 A. Yeah.

22 Q. I needn't ask you to look at your statement unless you
23 would like to, but you mentioned when you made
24 a statement shortly after the fire that you were
25 screaming for help, you were properly panicking at the

1 time, understandably.

2 A. Yeah.

3 Q. "One of the firemen took my daughter from me and shone
4 the torch to help us see ..."

5 A. Yeah.

6 Q. Do you remember that?

7 "... and we made our way down."

8 A. Yes.

9 Q. You felt unwell a couple of days later. As you were in
10 the stairwell coming down, can you remember how you were
11 feeling, what effect the smoke was having on you as you
12 came down past the 9th floor?

13 A. I was very hot and I noticed my skin felt funny.

14 Q. All right. So let's go back a little earlier, when you
15 noticed the smoke in the first place, when you were on
16 the 13th floor.

17 A. Yeah.

18 Q. You remember smoke was in the corridor on the 13th
19 floor?

20 A. Yeah.

21 Q. You've told us about that. Was the smoke in the
22 stairwell as you went past the 9th floor feeling as you
23 were worse as you went down there than it was on the
24 13th floor?

25 A. The -- yeah, the one on the 9th floor was worse than

1 that on the 13th, yeah.

2 Q. Yes, and the smoke was worse, I imagine, in the corridor
3 of the 13th floor than it was inside your flat? When
4 you opened the door, you saw smoke, and when you closed
5 the door to the flat, the smoke at least was shut out
6 from the corridor. Do you remember that?

7 A. Yeah.

8 Q. Thank you. All right, thank you very much indeed.

9 THE CORONER: Miss Ogbeifun, thank you very much indeed for
10 coming and thank you very much for the help that you've
11 been able to give us. You're welcome to stay if you
12 would like but you're free to go if you would prefer.

13 A. Right, thank you.

14 THE CORONER: Thank you.

15 (The witness withdrew)

16 THE CORONER: Yes.

17 MR MAXWELL-SCOTT: Madam, the next witness is Firefighter
18 Alex Miller. His statement starts at page 202 of the
19 statements bundle.

20 THE CORONER: Thank you. Mr Miller, would you like to come
21 forward? Thank you.

22 ALEXANDER MILLER (affirmed)

23 THE CORONER: Mr Miller, thank you. Do sit down. I think
24 there's a glass of water there. You've probably heard
25 me ask the two previous witnesses to make sure that they

1 speak closely to the microphone so that we can pick up
2 what's been said.

3 A. Okay.

4 THE CORONER: If you direct your answers across to the
5 jurors, that will help them and also help you to keep
6 close to the microphone. The typists are making
7 a transcription, so please don't speak too quickly.
8 Thank you.

9 Mr Maxwell-Scott, who's standing, is going to ask
10 questions initially on my behalf, and then there will be
11 some questions from others. Thank you.

12 Questions by MR MAXWELL-SCOTT

13 MR MAXWELL-SCOTT: Can you give the court your full name,
14 please?

15 A. Alexander James Miller.

16 Q. In July 2009, were you a firefighter based at the
17 Old Kent Road fire station?

18 A. Yes.

19 Q. At that time, how long had you been at Old Kent Road
20 for?

21 A. I think about eight -- eight months at station.

22 Q. And how long had you been a firefighter for?

23 A. 11 months.

24 Q. Were you still a trainee at the time?

25 A. I had diamonds, which indicates a trainee, yeah. On my

1 helmet, sorry.

2 Q. Just to be clear to the jury, you were wearing something
3 on your helmet that would have indicated to other
4 firefighters that you were a trainee?

5 A. Yes, yes.

6 Q. Had you ever been to Lakanal House before you went there
7 on 3 July 2009?

8 A. No.

9 Q. I'm going to turn, then, to ask you about your
10 involvement in the attempts to fight the fire on
11 3 July 2009. Is it right that you were mobilised from
12 the Old Kent Road fire station at around 4.20 in the
13 afternoon, just after 4.20?

14 A. Yes.

15 Q. Then you travelled there on the pump ladder?

16 A. Yeah.

17 Q. Do you remember who was with you on the pump ladder?

18 A. It was Watch Manager Howling, Firefighter Mullins
19 driving, Firefighter Sanchez, and Firefighter Belmont.

20 THE CORONER: Belmont?

21 A. Belmont, sorry, yes.

22 MR MAXWELL-SCOTT: Was your appliance the first one from the
23 Old Kent Road to arrive?

24 A. Yes, I -- I don't know. It was very close. It was
25 a convoy. We arrived in convoy, the two machines.

1 THE CORONER: Mr Miller, sorry, can you speak a little more
2 slowly.

3 A. Sorry.

4 MR MAXWELL-SCOTT: Do you remember anything being said or
5 discussed on the way from the fire station to
6 Lakanal House?

7 A. I've no -- no recollection of what was discussed
8 exactly.

9 Q. When you arrived at Lakanal House, did you notice other
10 fire engines there already?

11 A. Yes. I saw Peckham's -- one -- one of Peckham's
12 vehicles were there. That's what I remember. I was
13 under the impression two were there from the call slip
14 you get at station, but I only saw one.

15 Q. So your memory is seeing one, but you mentioned
16 a call slip. Is that what we've heard of as coming from
17 a teleprinter?

18 A. Yes, at the station, yes.

19 Q. Did that indicate to you that both the Peckham
20 appliances were being asked to attend?

21 A. I believe so, yes.

22 Q. Do you remember where your appliance parked when it
23 arrived?

24 A. Yes, I do. I believe it was just past -- I don't know
25 which side is east or west, but I believe it's just past

1 the side we initially came in from.

2 Q. Let me show you a photograph that may help you. This is
3 an aerial photograph. Lakanal House is in the middle of
4 the page where the white arrow is, and some roads are
5 marked.

6 A. I thought it was about -- between Dalwood Street and
7 Sedgmoor Place, just about where your thing is -- where
8 your cursor is, I think.

9 Q. Do you remember what your initial impressions were when
10 you arrived?

11 A. I remember thinking it was quite -- quite a big job from
12 what I've seen, because I've only done eight months at
13 that time, and it was quite -- it was punching out quite
14 a lot of flame and there was quite a lot of smoke, quite
15 high up, so it seemed like quite -- quite a big job.

16 Q. It may help you to know that our records indicate that
17 your appliance arrived just after 16.26 that afternoon.
18 The other appliance from the Old Kent Road arrived very
19 shortly after that.

20 A. Okay.

21 Q. Do you remember noticing anything falling from the
22 building?

23 A. Yes, I remember seeing debris falling, smouldering
24 debris.

25 Q. Did you say "smouldering"?

1 A. Some of it was smouldering, yes.

2 Q. Did you form any view of what it was that was falling at
3 the time?

4 A. Solid materials. Long lengths of -- I thought possibly
5 window frame but I didn't know. I couldn't tell you
6 what -- what it was.

7 Q. Was any of it on fire?

8 A. As it fell, but I can't recall if it was on fire when it
9 hit the ground.

10 Q. As it was falling some of it was on fire, but you
11 couldn't recall what happened after?

12 A. As it fell from the building, yes, some of it was on
13 fire.

14 Q. Do you remember any of your more senior colleagues
15 commenting at all on the fact that some of the debris
16 that was falling was on fire?

17 A. I remember -- I believe it was Crew Manager Willett
18 telling people to close their windows up and stay inside
19 because people were looking out at it, at the falling
20 debris. I don't know if it was because it was on fire
21 or -- I can't recall if it was definitely on fire.

22 Q. Was he saying that to residents or to firefighters?

23 A. No, to residents in the building below the floor where
24 the fire was. People were opening their windows and
25 looking up, which is obviously quite dangerous, and he

1 was telling them to shut their windows just to be safe,
2 stay inside.

3 Q. Was he using any kind of loud hailer to do that, or was
4 he just shouting as best he could?

5 A. No, shouting. It was as soon as we turned up, this was.

6 Q. What task were you given on arrival?

7 A. On arrival, I got off the vehicle with a couple of bits
8 of equipment, because it was obviously gonna be a high
9 rise job and you've got a list of stuff to take to a
10 bridgehead if it is a high rise job. So I took a couple
11 of pieces of equipment with me to John Howling, who then
12 told me they needed an ECO on the -- on the bridgehead.

13 Q. Just pausing there, you talk about getting some
14 equipment out because it was a high rise job. Did
15 anybody have to tell you what to do or did you know what
16 to do?

17 A. No, generally, when it is a high rise job, the people on
18 the back will have -- you'll talk amongst yourself as to
19 what you're going to take up there. I mean, it might be
20 duplicated by Peckham's crew, they might have done the
21 same, but you would normally take, say, lengths of
22 hose -- the essential things just to start off with:
23 lengths of hose, branches, the BA board, stuff like
24 that. You'll have that with you so you don't have to go
25 back to the machine, and it's there and you can just put

1 it in the lift ready to be taken up, just for speed,
2 really.

3 Q. You mentioned about being asked to be the ECO?

4 A. Yes.

5 Q. The entry control officer?

6 A. Yes.

7 Q. Was it Mr Howling who asked you to do that?

8 A. Yes, yes, I believe so.

9 Q. After he had asked you to do that, what did you do?

10 A. I went to the lift with my bits of equipment, put them
11 in and then I believe I went up to be ECO officer.

12 Q. Did you go up with anyone else?

13 A. I can't -- I can't recall. There was -- there was other
14 people in the lift but I can't remember -- I can't
15 remember who it was.

16 Q. Mr Miller, you made a statement ten days after the fire
17 on a 13 July 2009.

18 A. Yes.

19 Q. Do you think your memory then was probably better than
20 it is now --

21 A. Yes.

22 Q. -- some three and a half years later?

23 A. Yes.

24 Q. Would it help you to have a look at that statement?

25 A. Yeah.

1 Q. If the witness could be shown that. It starts at
2 page 202 in the statements bundle. (Handed) If you
3 look on the first page, 202, date of 13 July 2009. Do
4 you recognise that as your statement?

5 A. Yes.

6 Q. Then if you turn on in it to page 207.

7 A. Yeah.

8 Q. In the first paragraph, you talk about being tasked to
9 be the entry control officer and therefore getting
10 stuff, including the high rise gear, and then in the
11 next paragraph, you see, as you've just been saying,
12 Watch Manager Howling sent you as an entry control
13 officer. Then it says:

14 "... and Sanchez and Belmont as BA firefighters."

15 A. Yes.

16 Q. "The three of us entered the central entrance from the
17 same side of the building which was on fire, having to
18 skirt around the falling debris. Once inside this
19 entrance I could see a lift, which I called and found it
20 to be on the ground floor level."

21 I will just try and refresh your memory with
22 a photograph of the lift area. This is photo 7, and our
23 understanding is that at the time there would have been
24 one lift in service and one lift out of service, as one
25 sees in the photo. Does that help to refresh your

1 memory?

2 A. Yes, yes. This -- I didn't call the lift down, though.

3 It was already there. There was someone in it with --

4 with gear. I remember that much. It was full up with

5 gear.

6 Q. The statement says you started to load the equipment

7 into it, along with another firefighter from another

8 station. They were there already; is that right?

9 A. Yes.

10 Q. Presumably they must have been from Peckham?

11 A. Yes, they must have been, yes.

12 Q. The statement says:

13 "He told me that there was already another ECO in

14 place at the bridgehead, so I stayed downstairs as

15 Sanchez and Belmont went up in the lift."

16 A. Yeah, that's what it says, yeah.

17 Q. You then went back out to Watch Manager Howling, who was

18 still with the crew manager from Peckham outside?

19 A. I would have gone to get tasked another job, I imagine,

20 on that information, going from that.

21 Q. Because you had been told to be entry control officer

22 and then somebody had said there already was one and you

23 weren't needed, so you went to get another task; is that

24 right?

25 A. I imagine -- I can't remember but I imagine I would have

1 gone back to get tasked for another job, because there's
2 a lack of people there to start with.

3 Q. Madam, it's 11.20. Is that a convenient moment for
4 a break?

5 THE CORONER: Yes, it is, thank you.

6 Mr Miller, we're going to have a short break. The
7 strict rule is I must ask you to not talk to anyone
8 about your evidence or this case during this break,
9 thank you.

10 A. Thank you.

11 THE CORONER: Members of the jury, we'll have a short break.
12 Feel free to leave your papers behind. If you would go
13 with Mr Graham. We'll reconvene just after 11.30.

14 (11.21 am)

15 (A short break)

16 (11.30 am)

17 THE CORONER: Mr Miller, you're giving your evidence on
18 oath, and please remember not to speak too quickly.

19 A. Okay.

20 (In the presence of the Jury)

21 THE CORONER: Yes, thank you.

22 MR MAXWELL-SCOTT: Mr Miller, we'd just reached a point when
23 you'd been told that there was an entry control officer
24 already in place at the bridgehead, so you went back to
25 Mr Howling to get given another task?

1 A. Yes.

2 Q. If you look at your statement at 207, the penultimate
3 paragraph says that a message came down from the crew
4 manager upstairs asking in fact for another entry
5 control officer?

6 A. Yes.

7 Q. And Mr Howling told you to go up and assist?

8 A. That's correct, yes.

9 Q. To be that person?

10 A. Yeah.

11 Q. Is it right that you travelled up in the lift?

12 A. Yes, I did, yes.

13 Q. Was there anyone else who went up with you at that time?
14 Your statement says another firefighter from Peckham.

15 A. I remember there being other people in the lift, yes.
16 I thought there was two, but it says a firefighter from
17 Peckham, so ... at least one.

18 Q. When you got to the 7th floor, did you find the
19 bridgehead?

20 A. That's where we set the bridgehead up, yes. That's
21 where the crews were. People were working with the
22 hose. It had been loaded onto that floor out of the
23 lift. The bits of the -- the bits of equipment for the
24 bridgehead were on that floor, yes.

25 Q. Was that in the lobby immediately after you came out of

1 the lifts or was that in the central staircase?

2 A. The equipment was in the lobby, not the central
3 staircase.

4 Q. Had any crews been committed in breathing apparatus at
5 the time that you arrived, as far as you were told?

6 A. There was a crew that had put breathing apparatus on and
7 gone straight -- straight up, yes.

8 Q. And you were told of that? Or you saw it from a board?

9 A. No, I was told. I was told that. I was given the
10 tallies from them to start the entry control board, to
11 start putting the details in.

12 Q. So when you arrived, had an entry control board been
13 started?

14 A. No, I don't believe they had the -- the manpower to do
15 that and do all the other essential bits. That's why --
16 that's why I went up, to take that role.

17 Q. So you started up the board?

18 A. Yes.

19 Q. And you were told that a crew had already been
20 committed?

21 A. Yes.

22 Q. And you were given their tally keys?

23 A. That's right, yes.

24 Q. To insert in the appropriate place on the board?

25 A. Yes, and begin filling in the details of what they were

1 doing, their location, et cetera.

2 Q. Did you set up your board in the lobby area by the lift
3 or in the central staircase?

4 A. It was in the central staircase, mainly because the
5 communications with the crew manager was in the central
6 staircase, checking -- communicating with the team
7 that's gone in and other -- someone else was up there.

8 Q. The crew manager you mentioned, was that the person who
9 was in charge of the bridgehead?

10 A. Yes, yes.

11 Q. Did you know who he was?

12 A. I didn't recognise him, no. I knew he was from Peckham,
13 or the crew manager at Peckham, but I didn't recognise
14 him as being a crew manager of -- of Peckham.

15 Q. When you first got to the bridgehead, did you recognise
16 anyone who was there?

17 A. I recognised by face but I hadn't been there long enough
18 to know -- I didn't know names, or ...

19 Q. Were any of them from the Old Kent Road, or were they
20 all from Peckham?

21 A. I believe Belmont and -- Firefighter Belmont and
22 Firefighter Sanchez were there somewhere but I didn't
23 know any of the other -- the other firefighters there by
24 now.

25 Q. The final sentence of your statement on page 207 says:

1 "I put my PR to channel 6 ..."

2 Is that personal radio?

3 A. Personal radio, yes.

4 Q. "... which is the same channel that bone mikes work on
5 so I could keep in contact with all the committed
6 crews."

7 A. That would be relating to the BARIE -- BARIE equipment,
8 the breathing apparatus. "BARIE" is an acronym for
9 "breathing apparatus rapid" -- or "radio interface
10 equipment", I think it stands for.

11 Q. So the reference to bone mics, that's to the radios they
12 wear on the breathing apparatus?

13 A. Yeah, you get a bone microphone and it goes through the
14 vibrations of your skull, transmits through that.

15 Q. Do you recall your colleagues Sanchez and Belmont then
16 being committed?

17 A. Yes, I believe they were committed as soon as I got up
18 there pretty much, probably before I even put the
19 entries in for -- for the other crew.

20 Q. Just looking at the top of page 208, your statement
21 says:

22 "Another crew was committed past the entry control
23 point. This was made up of Sanchez and Belmont.
24 I checked them through and did a radio check with them
25 before they headed up to the 9th floor."

1 A. Yes.

2 Q. What's a radio check?

3 A. As entry control officer, there's -- you'll have a few
4 things you have to do to check -- check over them for
5 their safety, and one of those is the radio check.
6 I'll just establish a call sign so when I do want to
7 contact them they know it's them I'm trying to contact.
8 So it would be echo -- "Old Kent Road pump ladder 3",
9 say. So whenever, say, I want them, I would use that --
10 I'd say that to get them on radio.

11 So I'd just clarify that comms is working with them
12 at that point, and get a response and make sure it's all
13 clear and audible.

14 Q. Did you then experience some problems with radio
15 communication with crews that were committed?

16 A. Initially, I checked -- I did do all the comms checks
17 and it was fine at that level, except I think it was
18 John Clarke only had his personal radio because their
19 crew didn't have a comm set between them, so they used
20 his personal -- he set that to channel 6, his personal
21 radio.

22 Initially, there was no problem when they were at
23 the bridgehead but as they went up to the fire floors,
24 I was getting limited comms, if any.

25 Q. Can you just say that again so the jury are understand

1 and hear what you said. As the crews that were
2 committed went up from the bridgehead to the fire
3 floor --

4 A. Yes, there was limited comms.

5 Q. Limited comms?

6 A. It was -- yes, it was limited. I could communicate with
7 them through -- not runners but because they weren't
8 that far away from where I was, but the comms wasn't
9 very -- wasn't very good. The only person I remember
10 getting comms through the whole thing from the first
11 stage was Crew Manager Clarke, who used his personal
12 radio.

13 Q. So the crews using breathing apparatus radios, you
14 weren't having much success in speaking to them?

15 A. No. I was getting some, from my recollection, but
16 I don't think -- I don't think -- I can't recall how
17 much -- I couldn't tell you how much communication I was
18 getting. I was relaying messages through John Clarke,
19 I believe.

20 Q. Because he was using a personal radio and that was
21 working better?

22 A. Yes.

23 Q. You just mentioned Mr Clarke. Did there come a time
24 when he and Mr Bennett arrived at the bridgehead?

25 A. Yes.

1 Q. And also Mr Mason and Mr Mechen?

2 A. Yeah, Firefighter Mechen and Mason -- I believe I've
3 sent them in as the third crew and shortly behind was
4 Bennett and Clarke.

5 Q. Were you part of giving any briefing or instruction to
6 any crews?

7 A. No. I would have -- I would have noted down on the
8 entry control board what their briefing would have been.
9 There's a small space to put it in, so I would have put
10 it in as -- as little writing as I could have done,
11 I think, but I wouldn't -- I wouldn't personally brief
12 the crews.

13 Q. That's not your role?

14 A. No, I mean, I would try and overhear so it would save
15 time having to ask them.

16 Q. So the crew manager from Peckham was giving briefings;
17 is that right?

18 A. I believe -- I can't recollect, but I believe it would
19 have been him.

20 Q. Is what you're saying that you were trying to overhear
21 what was said so you could write it down on the entry
22 control board without having to ask again what the
23 briefing was?

24 A. You would -- you would try, depending on what you were
25 doing at that point. It's quite manic, so I would have

1 been -- you've got to get the times -- there's certain
2 things you've got to put on that board, one of them
3 being the time at which they all set out. You've got to
4 work out how long they've got before they should turn
5 around and you will warn them of that. So you've got to
6 figure out how long and what time you have to tell
7 them -- prompt them to check their gauges to see if
8 they've got enough air.

9 So if I wasn't busy doing that I would try to
10 overhear to write it down so that I don't have to ask
11 them, just to save time with them going up onto the fire
12 floor.

13 Q. The members of the jury have seen an entry control
14 board. One was physically brought into the court, so
15 they have a feel for what it looks like and how much
16 space there is on it.

17 A. Yeah.

18 Q. Can you help us with what sort of thing you might write
19 in the box for what the crew's instructions were?

20 A. Things like fighting -- fighting the fire on -- on
21 a floor number, or searching -- search and rescue, what
22 floor -- what flats, possibly, they're searching or
23 where they're searching, if they're just hose management
24 or things like that.

25 Q. Do you remember any discussion about what Mr Clarke's

1 and Mr Bennett's task ought to be before they set off to
2 carry it out?

3 A. No, no.

4 Q. Your statement refers to the crews that we've mentioned
5 being committed, and then the first Peckham crew coming
6 out, and then a crew from Brixton, a crew of three from
7 Brixton arriving and being committed, whom we now
8 believe were two firefighters from Brixton and one from
9 Peckham. Did you hear what was said by the first crew
10 from Peckham that came out? Was there any discussion at
11 the bridgehead by way of a debrief?

12 A. I -- I don't remember what was said, no. I -- no,
13 I couldn't -- couldn't tell you what was said. But
14 I remember them coming out and being debriefed, but
15 I don't know -- I wasn't privy to what was being said
16 there.

17 Q. Do you remember the crew of three from Brixton being
18 committed past the entry control point?

19 A. Yeah, I remember -- I remember thinking it's Brixton
20 because they had it written on their -- I knew it was
21 Brixton because they had it written on their cylinder
22 case but I don't recognise any of them. I do remember
23 them going in.

24 Q. Do you remember whether, at that point, the bridgehead
25 was in the same place or had it been moved?

1 A. I thought -- I thought it was in the 7th when they went
2 in. The entry control -- I think the entry control
3 board would say, so (indistinct)

4 THE CORONER: Sorry, I didn't catch that?

5 A. Sorry?

6 THE CORONER: I didn't catch what you just said.

7 A. I think -- I'm not sure that's correct, what I just
8 said, actually. I think on the entry control board it
9 said what floor they went in from. I don't think -- no,
10 sorry, that's wrong. I shouldn't have said that.

11 THE CORONER: Right.

12 A. Yeah, I made a mistake. The entry control board
13 wouldn't have said what floor they went in from.

14 MR MAXWELL-SCOTT: Do you remember seeing members of the
15 public, residents?

16 A. I know there were other people coming down, but I don't
17 remember seeing anyone. I don't remember seeing faces.
18 I just know there were people coming down.

19 Q. Do you remember residents being helped by firefighters?

20 A. I know it was happening, but I can't remember any
21 definite occasions.

22 Q. Do you remember there came a time when another officer
23 came and took over control at the bridgehead?

24 A. Yes, I remember -- the firefighter I was with was using
25 communications -- he was doing the communications whilst

1 I was doing the entry control side of things. So we
2 were both on channel 6 trying to communicate with the
3 teams up there, and there came a point when we switched.
4 He become -- he became the entry control officer and
5 I became the comms op. I can't remember when that was.
6 That was while we were on the 7th, I believe.

7 Q. But initially there was -- when you got there, there was
8 a crew manager who was in command --

9 A. Yeah.

10 Q. -- at the bridgehead. Did somebody come and take over
11 command from him?

12 A. Oh, right, sorry, yes, yes. Watch Manager Payton,
13 I believe, at some point.

14 Q. I'm going to try and test your memory as best we can.
15 I apologise for stretching it if necessary, but can you
16 remember, when Watch Manager Payton arrived, how many
17 crews had firstly been committed and then, secondly,
18 already come out and given you their tally keys back?

19 A. I can't remember. I remember Peckham definitely had
20 come out before he arrived.

21 Q. Is that one Peckham crew?

22 A. Definitely Peckham had come out before he had arrived.
23 I can't remember the exact timing.

24 Q. After he arrived, do you remember whether any further
25 crews were committed?

1 A. I can't -- I can't remember if we had the resources
2 then. I know -- no, I can't remember, sorry. I'm not
3 sure what point he arrived. I'm not sure if the
4 Brixton -- there's a chance the Brixton crew hadn't
5 been -- gone in, but I think all the others definitely
6 had.

7 Q. Do you remember anybody's alarm activating and a tally
8 key having to be used so that they could continue
9 firefighting?

10 A. Yes.

11 Q. Do you remember who that was?

12 A. It was Firefighter Mechen, I believe.

13 Q. I'm going to take to you to a document that might help
14 on that. It's in the advocates' bundle at page 1036.
15 (Handed) You almost certainly won't have seen this
16 document before, and probably haven't seen a document in
17 this format before. If I explain what it is. It is
18 a summary of information that can be got from the
19 bodyguard system, which is fitted to the breathing
20 apparatus sets the firefighters wore. It records when
21 sets are activated and also when they're shut down. So
22 this is the page for firefighters from the Old Kent Road
23 fire station, and if you look just over halfway down on
24 the right-hand side, do you see Mr Mechen's name?

25 A. Yes, I see.

1 Q. Then if you look across that row, there's some red text
2 on the left-hand side, which says:
3 "Wearer's ADSU activated. This is all the same
4 wear."
5 Does that help you to remember what happened?
6 A. No more than -- no more than -- no, sorry. I still
7 remember the event but that doesn't really aid me in any
8 way.
9 Q. So in terms of your memory of the event, did he come
10 back to the bridgehead with an alarm that had activated?
11 A. Yes.
12 Q. What does that mean? Does that mean it's making
13 a noise?
14 A. Yeah, it's -- it's -- yeah, quite a piercing, bleeping
15 noise.
16 Q. So he was at the bridgehead with you with a BA set that
17 was making a piercing noise?
18 A. He came to collect his tally, yeah. Collect a tally to
19 put it in to silence it and then went back, I believe.
20 Q. Did you do that for him or did you see somebody else do
21 it?
22 A. No, I passed him the tally to -- and he silenced -- he
23 silenced his and then -- I think, yeah -- I can't
24 remember what he done then, but I think he went -- he
25 might have gone straight back up. I'd be speculating.

1 But I passed him the tally, he passed it back and I put
2 it in the entry control board.

3 Q. Is it your recollection that he did then go back up?

4 A. He must have gone back up, yeah. I can't remember
5 exactly. He might have had a chat with the crew manager
6 about something.

7 Q. Just looking at this page here, our understanding of it
8 is that it shows him first starting up in bold at 16.47,
9 and then something happening at 17.02, and then, almost
10 seven minutes later, we see the time 17.08.56. That
11 might suggest a gap of six to seven minutes between the
12 alarm going off and going back to carry out
13 firefighting. Does that fit with your recollection, or
14 do you think it was shorter?

15 A. No, it was not -- it was not -- he was only down for
16 maybe -- it was a matter of a minute, maybe, at the
17 most.

18 Q. Was Mr Mason with him at the time?

19 A. I can't remember.

20 Q. Do you remember Crew Manager Clarke coming down and
21 having a discussion with Watch Manager Payton and then
22 going back to do some other tasks?

23 A. I do remember him being -- him and Firefighter Bennett
24 coming down at some point. I think they were escorting
25 someone down. I remember John being there, but I don't

1 remember what -- why he was there.

2 Q. Did conditions at the bridgehead change during the time

3 you were there?

4 A. Yes, yes.

5 Q. In what way?

6 A. Once the fire caught underneath us, the -- the -- the

7 stairwell started to get quite smoke-logged.

8 Q. So there came a time when on the 7th floor the stairwell

9 became quite smoke-logged?

10 A. Yes. Up until the point it caught underneath it was --

11 there was no problem, from my recollection. You could

12 smell fire but there was no visual -- you couldn't see

13 smoke until it caught underneath.

14 Q. Did you know at the time that a fire had started on the

15 lower floor, or is that something you learned later?

16 A. I can't remember. I don't believe I knew straight away

17 that that's what it was.

18 Q. The 7th floor bridgehead began to get smoke-logged. Do

19 you remember a decision being taken to move the

20 bridgehead down?

21 A. I don't remember the -- I remember moving it down, but

22 I don't remember that decision, what happened there.

23 I can't remember exactly the details of it. I just

24 remember moving it down.

25 Q. So do I understand from that what you don't remember who

1 decided it should move down?

2 A. Yeah, I can't remember that.

3 Q. Did you remember a more senior officer coming to the

4 bridgehead and, shortly after that, the bridgehead

5 moving down?

6 A. Yes, yeah.

7 Q. Do you remember who that was?

8 A. That would have been Watch Manager Payton.

9 Q. Do you remember Guy Foster coming to the bridgehead?

10 A. No.

11 Q. When the bridgehead was moved down from the 7th floor,

12 do you remember how many crews were still committed?

13 A. No. I know -- I know obviously the first crew from

14 Peckham -- I know Brixton were -- or I thought Brixton

15 were. No, I couldn't -- I couldn't tell you.

16 Q. Is it right that as you made your way down the building,

17 the bridgehead was never permanently established at

18 a lower floor and it was eventually set up outside?

19 A. I think it stayed at level 3 for not -- probably no

20 longer than ten minutes, if that, and then it went

21 straight out and it went outside.

22 Q. What did you do after you had gone outside the building?

23 A. I believe it went downstairs outside, close to the

24 building, the bridgehead, and then it -- no, not the

25 bridgehead -- yeah, the entry control point of the

1 bridgehead, and then it came back a bit further from the
2 building because of debris falling down or something.
3 And then I started help -- I helped -- I can't remember.
4 I can't remember if I saw the crews out or -- I imagine
5 I did. I wasn't actually entry control officer at that
6 point. I would have been comms op. But that bit's
7 hazy. Coming out of the building's quite hazy, what I
8 done.

9 Q. I'm just looking at your statement at page 210. The
10 second paragraph says you waited around for ten minutes.
11 Then you were told that extended duration breathing
12 apparatus wearers were being committed and that "we were
13 not needed" so you took off your sets. Then as a crew
14 you collected 45-millimetre hoses from a number of
15 different appliances and made a pile of equipment ready
16 for use near the entrance. Does that sound right?

17 A. Yeah, yes, that sounds correct, yeah.

18 Q. Then, later on, your statement says Group Manager
19 Andrews tasked you to go up to the 1st floor and check
20 out directions to see if there was any other way to get
21 into the building, and you did that?

22 A. Yes.

23 Q. You then took him up to show him what you found?

24 A. Yeah. He asked me if there was any other fire escapes,
25 any other access out of the building for the -- the

1 residents, and I ran, I think, to the 1st or 2nd floor,
2 ran along the corridor. There wasn't, so I went back
3 and told him that, which is what it says here, so ...

4 Q. Do you remember what it was like on the 1st floor at
5 that time?

6 A. Yeah, it was -- there wasn't any smoke.

7 Q. Your statement says that you went back to near the entry
8 control point and helped out as and where you could with
9 the entry control board and other things until
10 Group Manager Andrews moved the bridgehead back into the
11 3rd floor.

12 A. Yeah, I don't know that it was Group Manager Andrews who
13 done it. Wait a second. Yeah, I don't know if Group
14 Manager Andrews did do it, but that is what I done,
15 yeah.

16 Q. Did you then stay working at the entry control point for
17 the rest of the time you were at the incident until just
18 before 10 in the evening?

19 A. Yes, yes.

20 Q. Whilst you were there, did you see crews being briefed
21 and debriefed?

22 A. I was more getting equipment and bringing it. Anything
23 that was needed, I would go and get it off a machine and
24 run it up -- run in between points getting equipment to
25 the bridgehead as and when it was needed. I don't

1 remember -- I wasn't -- they had the lobby where all the
2 briefing was going on with the actual crews and
3 I wasn't -- I was more in the stairwell area.

4 Q. My final significant topic is about knowledge that you
5 built up in the course of the incident of certain
6 features of the building. I have heard and fully
7 understand that it wasn't your job to brief or debrief
8 crews, that you had other important tasks to carry out
9 at entry control point, but it would help us if we could
10 ask you about certain features of the building and
11 whether you learned about them in the course of the day,
12 and if so, approximately at what stage. Okay?

13 A. Yes.

14 Q. So firstly, did there, at any point, come a time when
15 you learned that the flats in the buildings were
16 maisonettes, in other words that they were on two floors
17 with internal staircases?

18 A. No, I don't think I was -- I don't remember being aware
19 of that.

20 Q. Did you ever become aware that on the upper floors of
21 each flat, the flat extended the full width of the
22 building, so it had windows on one side, looking out of
23 the west side, and also windows on the east side?

24 A. No, I believed the flats were -- I didn't realise they
25 went across the stairwell -- across the hallway. I just

1 assumed it was on either side of the building.

2 Q. You mentioned the stairwell in your answer. Did you

3 mean the central stairwell?

4 A. No, sorry, I mean the hallway -- the hallway leading to

5 the flats. I just assumed the flats were on either

6 side, I didn't realise they went over the -- the

7 hallway.

8 Q. Did you ever learn that the flats had balcony escape

9 routes that led to the central staircase?

10 A. No.

11 Q. I've put up on screen a representation of what

12 Lakanal House looks like from ground floor level,

13 looking at the west side. I'm now going to place over

14 it flat numbers. So this is a diagram that shows by

15 reference to the windows you can see when you look at

16 the west side which flat they are. Did you ever begin

17 to build up any sort of mental picture like that of

18 where flats were within the building?

19 A. No.

20 Q. Taking you back now to this photograph number 7 in the

21 ground floor lift lobby area. You see the sign above

22 the lifts?

23 A. Yes.

24 Q. I'll show you a close-up of it in photograph 8. Do you

25 recall ever noticing that sign on the day?

1 A. I don't remember on the day, but that's quite typical of
2 high rises in Southwark. Most of them have got a -- one
3 of those signs saying what numbers are on what floors.

4 Q. Is the word you used "typical"?

5 A. Most high rises on Old Kent Road's ground would have
6 a sign which would say -- in the lift lobby area at the
7 bottom. Not on every floor but at the bottom, you'd
8 have something like that.

9 Q. My final question is this: looking back on your
10 involvement on the day of the fire, is there any single
11 thing that you can think of that would have most helped
12 you to carry out the tasks that were assigned to you
13 that day?

14 A. It was just the comms, really. If the comms -- I mean,
15 obviously more -- more crews going in initially would
16 have been good, but the comms -- having comms that
17 were -- that worked perfectly.

18 Q. I understand. Thank you very much. Those are my
19 questions, but there may be some questions from others.

20 Questions by MR EDWARDS

21 MR EDWARDS: Thank you. Mr Edwards on behalf of some of the
22 families. Can I ask you to turn to page 206 of the
23 witness statement you gave the police, please. Could
24 someone put that up on the screen as well, please.

25 You were asked about debris which was falling from

1 Lakanal House when you arrived, and you said you thought
2 it was smouldering. If I can direct you to the final
3 paragraph on page 206, about halfway down. What you
4 said then is:

5 "It appeared to be parts of the window frames and
6 fascia. It was on fire as it fell to the roadway below
7 near where the stairway and entrance was."

8 A. Yes.

9 Q. Does that help jog your memory?

10 A. Sorry?

11 Q. Does that help jog your memory?

12 A. Yeah, that is -- yeah, what I remember, I suppose.

13 Q. So the debris was on fire as it landed?

14 A. I -- I don't remember it being on fire as it landed, but
15 if that's what it says, then that is correct, I suppose.

16 Q. You've given evidence about the various bridgehead
17 moves. I appreciate you didn't know exactly what was
18 happening above the bridgehead at the different
19 occasions when it moved down the building. As far as
20 you're able to say, when the bridgehead was moved to the
21 3rd floor and then later on the ground floor --

22 A. Yes.

23 Q. -- did firefighting continue on the 9th floor?

24 A. I -- I wouldn't be able to -- I couldn't tell you
25 without seeing -- I'm not sure who was in at that point

1 when we moved down. If there was still crews on the 9th
2 floor fighting fire, then they would have stayed there
3 fighting the fire. I can't remember what Brixton --
4 I can't remember what they were briefed to do. I'd have
5 to see the entry control board, because I know they were
6 still in there when we brought it down to the 3rd.
7 I thought they were.

8 Q. Presumably you're not able to say whether search and
9 rescue was carrying on on the 9th floor or above either?

10 A. I can't remember what each crew was tasked to do.

11 Q. Thank you.

12 MS AL TAI: No thank you.

13 THE CORONER: Yes, Mr Compton.

14 Questions by MR COMPTON

15 MR COMPTON: Mr Miller, Ben Compton. I represent
16 Apollo Services, so just one or two matters, please.
17 You've told us that you were a trainee. Was that
18 a trainee in the breathing apparatus side of matters?
19 How far had your training progressed?

20 A. I'd completed all my training at Southwark but being
21 a trainee, you do, like, a trial -- not a trial period
22 but a period where you watch and you -- you're still
23 learning. You've got all your knowledge, but you're
24 learning -- like an apprentice, I suppose, kind of
25 thing. So you're still watching and learning but you

1 have got knowledge of all the breathing apparatus.
2 You've done all the tests and stuff to prove you're
3 capable of it.

4 Q. I understand that, but you have some signs on your
5 helmet, don't you, to draw attention to the fact that
6 you're still a trainee?

7 A. Yes, just to draw -- yeah. Help officers to --

8 Q. So others know, what were they? Orange dots or diamonds
9 or something? What did you have on your helmet?

10 A. They're -- yeah, large -- large circles with a square
11 cut out of them. They're called diamonds.

12 Q. That's good sense, isn't it, because with your lack of
13 practical experience, others will know in an emergency
14 that you're a trainee?

15 A. Yeah, depending on -- well, yeah.

16 Q. Now, you told the coroner and this jury that you'd never
17 been to this building before?

18 A. To my knowledge, yeah, correct.

19 Q. So it follows that you had no familiarisation training
20 with the building?

21 A. No.

22 Q. And you had no idea of the layout?

23 A. No, that's correct, yes.

24 Q. When you arrived there, did anyone tell you about the
25 layout or any unusual features of the building?

1 A. Not to my knowledge, no.

2 Q. I think that follows from answers you've given to
3 Mr Maxwell-Scott. So you're outside looking up at this
4 fire, and it's a hot summer's day?

5 A. It was sunny, yes. I can't remember how hot it was.

6 Q. I'm just taking it from your statement. A hot summer's
7 day.

8 A. Sorry.

9 Q. And people have their windows open?

10 A. Yes, that's correct.

11 Q. We've heard that these windows can open outwards, and
12 because of falling debris, that was causing concern to
13 firefighters on the ground?

14 A. It -- it would have done, yes.

15 Q. Because of people looking out. When the -- I think it
16 was the crew manager from Peckham who was shouting out
17 to people. Was he using a loud hailer?

18 A. No.

19 Q. Because there were loud hailers around, weren't there?

20 A. There was, yes. It was more a -- an instinct thing as
21 they were poking their heads out. It wasn't -- wasn't
22 happening all the time. As I walked over, it happened,
23 and he just shouted: "Put your head -- close the
24 window."

25 Q. Could you tell if people could hear over the noise?

1 A. People were reacting.

2 Q. Closing the windows?

3 A. From what I saw of the person he said it to. It was
4 more -- he wasn't standing there telling a whole group
5 of people. It was more -- it was directed at a certain
6 person.

7 Q. We know there were loud hailers because I think you were
8 asked to get a loud hailer later on, weren't you,
9 from -- was it Watch Manager Payton, whom we're going to
10 hear evidence from? When he was inside the building,
11 you collected a loud hailer for him?

12 A. I -- I don't remember actually doing it but I'm sure
13 I did.

14 Q. It's a long time ago. I appreciate that.
15 I just want to ask you about the radios, just to
16 park this particular point. When you're there, round
17 the bridgehead, were you put in charge of the BAECO
18 board at one point?

19 A. Yes.

20 Q. The BAECO board is the breathing apparatus entry control
21 board?

22 A. Yeah, entry control board.

23 Q. And no breathing apparatus fireman or fireman in
24 breathing apparatus can go past that point unless his or
25 her number is on the board and with the timings on it?

1 A. That's correct, yes.

2 Q. We've heard about that. The board seems to have been
3 full, almost full; is that correct?

4 A. It -- I had a spare board, but yes, it was very close to
5 being full.

6 Q. Were you actually at one point in charge of putting
7 entries on the BAECO board?

8 A. I think the majority of the entries on that first BAECO
9 board were mine.

10 Q. And then when I think it was Mr Payton came along, did
11 he actually change the system slightly and put somebody
12 else in charge?

13 A. Yes, he did, yes. He -- the firefighter who was with me
14 was -- had done a lot more time, and I think he made
15 a -- because the incident was getting projected.

16 Q. This is a vitally important aspect of firefighting,
17 isn't it, the BAECO board?

18 A. Yes, it is.

19 Q. Because you know who's gone out and who's coming back.
20 During this time, you were having problems with your
21 radio, weren't you?

22 A. I was having problems with the communications, yes.

23 Q. I just want to -- I said I'd talk about this -- just ask
24 you to go to your statement at the top of page 208.
25 Forgive me if this has been dealt with, but I think it

1 may be an important matter for the jury. I'm going to
2 read it to you verbatim, and then we'll go down two
3 paragraphs on:

4 "While in this role, I attempted to call the Peckham
5 crew but for some reason their radios didn't seem to be
6 able to transmit to me. I could hear radios at the
7 bridgehead, but beyond that I could hear nothing, just
8 a bleeping noise."

9 Pausing there. So you're there with the BAECO board
10 and you can't contact anyone above?

11 A. Not -- I could get through to John Clarke.

12 Q. We'll come back to that in a moment.

13 A. Sorry.

14 Q. But to others, those of the Peckham crew, you couldn't
15 get through to them?

16 A. Not everyone, no.

17 Q. Well, you say, if we go two paragraphs on:

18 "Once the crews had been committed, the only person
19 I had radio contact with was Crew Manager Clarke via his
20 PR."

21 His personal radio; is that right?

22 "All the others were just making a bleeping noise."

23 A. I don't recollect the bleeping noise. I believe
24 initially I did have communications with -- with one --
25 I can't remember how many crews but with not only -- not

1 just John Clarke.

2 Q. You've been asked this before, but this is your
3 statement taken shortly after the event.

4 A. That's correct, yes.

5 Q. Before this vast passage of time, many, many months
6 later. When you record that the others were just making
7 a bleeping noise, is that likely to be correct?

8 A. It is likely, but I have got no recollection of that
9 bleeping noise.

10 Q. If you then go to the top of page 209, to follow on from
11 this -- and it's the second paragraph down:

12 "At about this time, Watch Manager Payton from
13 Southwark arrived at the bridgehead and spoke with the
14 crew manager. I informed him that I couldn't get
15 through to the crews on the radios."

16 Is that right? Do you have that passage?

17 A. I have that, yes. I don't remember the exact event but
18 I would have passed that information on to whoever's in
19 charge at some point.

20 Q. What was the reaction to that? Can you remember?

21 A. I -- I can't remember that conversation, I'm afraid.

22 Q. The next paragraph:

23 "I remember getting a message over the personal
24 radio from Crew Manager Clarke, who was searching
25 a flat. I recorded it on the BA board, but can't

1 remember which one it was now. Due to the poor
2 communications, Crew Manager Clarke asked me if there
3 were any messages to be passed to the other BA crews."
4 Do you have that?
5 A. Yeah, got that.
6 Q. What would be the answer to that? Were there any
7 messages that you had that were to be passed on to the
8 other BA crews?
9 A. I can't remember exact questions, but it would have been
10 likely location.
11 Q. And if there had been questions, would they have been
12 recorded?
13 A. Yes, if it was important information, it would be on the
14 BA board.
15 Q. Where would it be recorded?
16 A. It would be on the BA board.
17 Q. On the BA board. Was there enough room? We already
18 have one -- we've seen photographs of this, but one
19 that's full and the other board being used. Was there
20 sufficient room to record these sort of messages?
21 A. There's not a -- there's not a lot of room on the board
22 but you abbreviate quite a lot to -- I mean, if I had
23 abbreviated on it, I'd know what my abbreviations were,
24 as long as I knew what they were and I can pass that on.
25 Q. It's important that other people know what you are

1 abbreviations are as well, isn't it?

2 A. Yes, that's true.

3 Q. Thank you very much.

4 Questions by MS CANBY

5 MS CANBY: Mr Miller, I'm Fiona Canby and I'm asking
6 questions on behalf of SAPA.

7 THE CORONER: Miss Canby, do you think you could try and get
8 your microphone closer to you?

9 MS CANBY: Is that better?

10 THE CORONER: Not a lot.

11 MS CANBY: I'll hold it up.

12 THE CORONER: Thank you very much.

13 MS CANBY: Can I just ask you, please, to look at page 206.
14 You were taken to this passage by Mr Edwards. You say
15 this in your statement dated 13 July:

16 "As I was looking up at the fire, I could see that
17 a majority of the block's windows were open. It was
18 a hot summer's day and they were obviously open for
19 ventilation. Although it was hot, I also noticed that
20 it was rather windy. I could see the trees moving
21 around a lot."

22 Is that passage in your statement accurate,
23 Mr Miller?

24 A. Yes.

25 Q. Thank you very much.

1 Questions by MR WALSH

2 MR WALSH: Thank you very much. Mr Miller, the statement to
3 which you have been taken quite a lot -- and entirely
4 properly -- is one which was made on 13 July 2009. So
5 that statement is the result of you having been asked
6 a lot of questions --

7 A. Yes.

8 Q. -- by those who were interested in investigating the
9 fire, and your replies are recorded there. So that is
10 there to help you in relation to your recollection.
11 You've obviously been asked today, more than three years
12 later, your recollection about quite a lot of other
13 matters of fairly fine detail. But you weren't asked to
14 recall them in July 2009, otherwise they'd be in your
15 statement; is that right?

16 A. Yes.

17 Q. It's obviously very difficult. We all acknowledge that.
18 You're now looking back more than three years to recall
19 particular fine points. That's why you've been taken to
20 your statement. I'm afraid I'm going to take you to
21 page 206, because this last paragraph on page 206 has
22 been referred to by, I think, everybody who has asked
23 you a question today. But there's just one part of that
24 paragraph that I want to take you to that hasn't been
25 touched upon yet, the last paragraph. This is just as

1 you arrived, and you're describing that when you arrive
2 you can see a fire on about the 9th floor:

3 "It was coming out of the windows and spreading
4 upwards and getting bigger."

5 Do you see that?

6 A. Yes.

7 Q. "Flames and smoke were rolling up the walls to engulf
8 the floors above. The smoke didn't seem that thick, and
9 at this time it looked like it was only confined to one
10 flat."

11 That was your perception at that time?

12 A. Yes.

13 Q. Confined to one flat. Now, obviously there came a point
14 when you were, as we've heard, committed up to the
15 bridgehead, and you were performing the task of entry
16 control which you have described. How long had you been
17 at the Old Kent Road fire station?

18 A. I believe I started in September 2008 at Old Kent Road.

19 Q. Right. When you started there in about September of
20 2008, you had undertaken and completed your training at
21 Southwark?

22 A. Yes.

23 Q. So you were fully qualified as a firefighter to perform
24 the tasks that you were required to?

25 A. Yes.

1 Q. And when you were responsible for the entry control
2 board -- we've already heard that the board was getting
3 pretty full and there was a point when there were only
4 three spaces left. There was quite a lot of coming and
5 going, quite a lot of work that you had to concentrate
6 on?

7 A. Yes.

8 Q. So while you were focussing on your task, were you
9 particularly aware of what was happening around you,
10 people going up the stairs, coming up the stairs, as to
11 who they were, unless it was in relation to records on
12 the entry control?

13 A. A lot of stuff -- you are told not to get too
14 task-focussed but a lot of stuff around you -- it is
15 quite important to get all the timings right, when --
16 the time of the whistle and stuff, so when you're
17 figuring that out, you do have to block out, to
18 an extent, other things around you.

19 Q. Yes, you have to focus on your job, what you're doing?

20 A. Yes.

21 Q. You were asked by Mr Maxwell-Scott in relation to the
22 point before the bridgehead was moved when you noticed
23 smoke-logging on the bridgehead itself?

24 A. Yes.

25 Q. Which means that there was smoke-logging in the central

1 stairwell?

2 A. Yes, when it caught underneath us, that's when ...

3 Q. Yes. It's just that you said it may have happened when

4 the fire caught underneath you. I'm going to ask you to

5 think about that, because when you were on the 7th

6 floor, you weren't aware, were you, about the fires

7 having caught underneath you until later on, until the

8 bridgehead had to move?

9 A. Until it was moved, yeah, I wasn't -- I don't think

10 I was aware. I might have assumed, but I don't think

11 I was aware for sure.

12 Q. You may have presumed because of what you learned later,

13 but at the time that you were on the bridgehead and you

14 could see smoke-logging, at that time -- can I put it in

15 this way -- you wouldn't have known then whether the

16 smoke-logging was as a result of fires catching below or

17 some other reason, at that point?

18 A. I -- yeah, I can't recall if I would have known.

19 Q. All right. Then just to be clear about the question

20 which was asked -- I think Mr Maxwell-Scott asked you

21 about it. That was in relation to the request, when you

22 came out of the building later, by Group Manager

23 Andrews. He wanted you to go and check fire escapes?

24 A. Yes.

25 Q. By that, are we to take it from what you told us that he

1 wasn't asking you to look at balcony fire escapes but to
2 go to see if there was any other way of getting down
3 from the upper floors other than via the central
4 stairwell?

5 A. I believe, yes, he wanted me to check that there wasn't
6 other stairwells.

7 Q. And as we know, there was no other means?

8 A. No.

9 Q. All right. Thank you very much.

10 Questions by the Jury

11 THE FOREMAN OF THE JURY: Thank you, madam coroner. We have
12 two questions. We were just wondering if
13 Firefighter Miller remembers who the original entry
14 control officer was -- sorry, there's a number of parts
15 to this -- and also why Mr Miller was not requested on
16 first arriving at the bridgehead -- sorry, not required
17 on first arriving at the bridgehead but then was later
18 requested to return by Watch Manager Howling.

19 THE CORONER: Can I just stop you there. Let's just take
20 these one at a time. So the first question is whether
21 you can recall who was the original entry control
22 officer; is that correct?

23 THE FOREMAN OF THE JURY: I think so, yes.

24 A. Yeah. There was no -- I was the first entry control
25 officer. There was no-one before me.

1 THE CORONER: Okay.

2 THE FOREMAN OF THE JURY: Okay, thank you. You were not
3 requested on first arrival at the bridgehead -- sorry,
4 could I just confirm with my fellow juror?

5 THE CORONER: Yes. (Pause)

6 THE FOREMAN OF THE JURY: Okay, sorry. What we're trying to
7 clarify was that you went up to the bridgehead, found
8 that you weren't needed and came down, and then were
9 told to go back up again.

10 A. No, no.

11 THE FOREMAN OF THE JURY: You didn't?

12 A. I helped with stuff -- carrying stuff on the lift.
13 Watch Manager Howling told me to go to be entry control
14 officer. When I took bits of equipment to go up there,
15 I put it in the lift, and then I was told that there was
16 an entry control officer. I think they thought they had
17 the resources up there. So I took that information back
18 to John Howling.

19 THE CORONER: So you were still at the bottom of the lift?

20 A. I went to the lift at the bottom, and then it was
21 a matter of by the time they got to the top -- so, say,
22 40 seconds -- the message came down saying, "No, we need
23 an entry control officer", and then that's when I went
24 up.

25 THE FOREMAN OF THE JURY: Okay, thank you. The other

1 question was: we've heard from a number of your
2 colleagues that the BA wear length can vary a great deal
3 between the physical fitness of the firefighter, what
4 they've been doing, the heat, things like that. So
5 first, when you're noting the times on the entry board,
6 is there a standard time that you allocate? If a person
7 gives their tally at 4 o'clock, you say you need to be
8 out by 4.15, or does it change according to the person?

9 A. You have -- you have on their gauge, depending on what
10 pressure they have in their cylinder, that will say --
11 for instance, 170 bars of pressure in their cylinder.
12 That will relate to a number on the BA board. It will
13 say 170 is, say, 20 minutes safe, for instance. 180-bar
14 would be this amount, 30 minutes. So you would refer to
15 that. Whatever their lowest gauge written is, you would
16 put that --

17 THE FOREMAN OF THE JURY: So it is dependent on the actual
18 cylinder. Just on that, you say that they need to check
19 their levels at a certain time. If you're fighting
20 a fire, how do you know what time it is?

21 A. Sorry, could you ask that again?

22 THE FOREMAN OF THE JURY: You say that you tell the
23 firefighters: "You're going in at this time. You need
24 to check your levels at this time." How do they know
25 how much time's passed?

1 A. No, what -- what happens is we -- we work out how many
2 minutes from the time they give us when they go in, and
3 then we prompt them to check what they've got on
4 their -- on their gauge, and it'll have a time on.
5 Depending on how hard they work, the time will go down,
6 so it'll say 26 minutes left, and then you'll have the
7 gauge -- the pressure, sorry, and then they'll tell me
8 the pressure -- they'll relay what they've got left --
9 you know you've got to turn around by a certain pressure
10 on the gauge. You know you've got to get back to the
11 entry control point before it gets to a certain
12 pressure.

13 THE CORONER: So are you saying that a firefighter is
14 expected to monitor the pressure, but not the time?

15 A. You -- you go -- you get to know that if you've got
16 100-bar pressure you've got this long, depending on
17 how -- how hard you work, but I'm there to -- it's hard
18 to explain. Yes, yeah, what you said, yeah.

19 THE CORONER: Well I am just wondering if that is what
20 you're actually agreeing with. The juror's question
21 was: how does a firefighter keep a check on time passing
22 when he's actually fighting the fire? Are you saying
23 that a firefighter isn't expected to keep an eye on
24 a watch or a clock for time passing, just to keep an eye
25 on the pressure?

1 A. Yeah, that's right, sorry, yeah.

2 THE CORONER: Okay.

3 THE FOREMAN OF THE JURY: Thank you. I think that covers
4 it.

5 THE CORONER: Thank you very much.

6 MR WALSH: Madam, on that very topic, can I just ...?

7 THE CORONER: I can't hear you.

8 Further questions by MR WALSH

9 MR WALSH: Just on that very topic, can I just clarify one
10 further matter which just finishes the point off?

11 There is also a whistle on the BA set which goes off
12 when the pressure becomes low?

13 A. Yes, yeah.

14 Q. To warn the firefighters, and they can hear them?

15 A. Yes.

16 THE CORONER: Thank you.

17 Thank you very much, Mr Miller. Thank you for
18 coming, thank you for the information that you've given
19 us. You're welcome to stay if you want, but you're free
20 to go if you would prefer. Thank you very much. Don't
21 worry, just leave the bundle there. We'll probably need
22 it again in a moment. Thank you.

23 A. Thank you.

24 (The witness withdrew)

25 THE CORONER: Yes, Mr Mullins? Mr Mullins, would you like

1 to come forward.

2 MARK MULLINS (sworn)

3 THE CORONER: Mr Mullins, thank you very much. Do sit down.

4 A. Thank you.

5 THE CORONER: Help yourself to a glass of water if you would
6 like.

7 A. Please, thanks.

8 THE CORONER: Thank you. If you could try, please, to speak
9 fairly slowly -- well, not slowly, but not too fast, so
10 that the typists can make a transcription of what's
11 being said, and speak closer to the microphone so that
12 we can hear what you're saying. It might feel a bit
13 artificial but if you could give your answers across the
14 room to the jurors, that will help them to hear what
15 you're saying and also help to keep you close to the
16 microphone.

17 A. Yes, madam.

18 THE CORONER: Thank you. Mr Maxwell-Scott, who's standing,
19 is going to ask questions on my behalf initially and
20 then there will be probably be questions from others.

21 Questions by MR MAXWELL-SCOTT

22 MR MAXWELL-SCOTT: Good afternoon, Mr Mullins. Could you
23 give the court your full name please?

24 A. My name's -- my name's Mark Mullins.

25 Q. Is it right that in July 2009 you were a firefighter

1 based at the Old Kent Road fire station?

2 A. That's correct.

3 Q. You still work for the London Fire Brigade?

4 A. Yes, I do.

5 Q. How long have you worked as a firefighter?

6 A. Just under 19 years.

7 Q. I think it's right that you hadn't been to Lakanal House
8 before the fire on 3 July 2009?

9 A. That's correct.

10 Q. So I'll start by asking you your recollection of your
11 involvement on that day. We know that appliances from
12 the Old Kent Road fire station were mobilised just after
13 4.20 in the afternoon. Which appliance were you on?

14 A. I was driving the pump ladder, Echo 351.

15 Q. Can you remember where you parked it when you arrived at
16 Lakanal House?

17 A. First of all we turned up in the road, Dalwood Street,
18 and parked by the service road that runs down the side,
19 which I believe is what you're calling the east side of
20 the building, the front of the building.

21 Q. If you pause there, I will show you some photos. I have
22 an aerial photo that may help. Lakanal House is in the
23 middle where my white arrow is. The entrance where the
24 lifts are is the west side, which I'm marking here,
25 where it says "Sedgmoor Place", and the entrance where

1 the central staircase is on the east side. If it helps,
2 I think you did a diagram shortly after the event, and
3 I'll show you that diagram now. Could we go to the
4 advocates' bundles, page 196 in file 1. (Handed)

5 I think you're looking at the map itself. On the
6 previous page, there's a slip of paper that explains
7 what the map is. If you turn back one page to 196.
8 Yes, that's it. It's going to explain what we're going
9 to look at on the next page. It says:

10 "Point A refers to position of fire appliance on
11 arrival and point B to position of ALP."

12 I think it says. If I could take you then to 197.
13 Lakanal House is where my arrow is, towards the bottom
14 right of the page.

15 A. Yeah. Yeah, I understand that, sir, yeah. I've
16 orientated it now. I understand.

17 Q. Thank you. So the "A" is meant to indicate where you
18 parked?

19 A. Yeah, that is correct, yeah.

20 Q. And the "B" relates to an aerial ladder platform, and
21 that's somewhat later in the story?

22 A. Yeah.

23 Q. As the driver, did you have any particular role that was
24 going to fall to you on arrival?

25 A. Yeah, on arrival, obviously to park the machine in the

1 best place possible, and then your next main role is to
2 stay with the gov'nor, which was John Howling.

3 Q. Tell the jury what you mean by "the gov'nor"?

4 A. Sorry, the gov'nor is the officer in charge, which, on
5 the day, was John Howling, Watch Manager Howling, and
6 basically my job is to relay his messages to control,
7 what he wants to send, what appliances he wants sent on
8 the job, et cetera.

9 Q. By control, you mean brigade control?

10 A. That's correct.

11 Q. Which is like an operations room, which is somewhere
12 else in London?

13 A. That's correct.

14 Q. So you are the person who helps the incident commander
15 to relay messages to and from brigade control?

16 A. That's correct.

17 Q. Do you have anything that you use to help you to keep
18 track of messages that need to be relayed in that way?

19 A. At the time, we had notepads on the front of the fire
20 engine that we'd write things down in.

21 Q. Can you just describe to the members of the jury what
22 those note pads are like?

23 A. The note pad is basically about that high, which is
24 about six inches, about three inches across, and it's
25 just a message pad. You write messages down on it.

1 Q. Presumably you have pens or pencils with you as well?

2 A. Yes.

3 Q. Where did Watch Manager Howling position himself on
4 arrival? I'll take you back to that aerial photograph,
5 if I may, because it may help. This is photograph 3.

6 A. There's a green area in front of the -- where the
7 service road is that goes down to it, there's a green
8 area in front of that. That's where he positioned
9 himself, so he could see the whole block.

10 Q. By the service road, do you mean Sedgmoor Place, which
11 I'm showing with my arrow on the west side of the
12 building?

13 A. To be honest, sir, I didn't know that was called
14 Sedgmoor Place. I thought Sedgmoor Place was opposite.
15 I may be wrong.

16 Q. Well, we see the words "Sedgmoor Place" twice, but don't
17 worry about that. I only mentioned it to draw attention
18 to where it is on the map. Is it the road which I'm
19 marking with this arrow running north/south on the west
20 side of the building that you're talking about, and the
21 grass area to the left of it which I'm showing?

22 A. I'm not sure, sir, because as far as I knew that was
23 just a service road. I didn't realise that actually had
24 a name, Sedgmoor Place, so ...

25 Q. Don't worry about the name of it. I'm just trying to

1 get you to help us as best you can remember with where
2 Mr Howling positioned him as incident commander.

3 A. Well what -- what we called the front of the building,
4 the green in front of that, that is where he positioned
5 himself, not far from where the central staircase was.

6 So if it makes it any clearer, sir, what I would say
7 is where Peckham set their fire engine in to the
8 dry riser, he wasn't that far away from their machine,
9 if that makes sense.

10 Q. We've heard evidence that they parked on this service
11 road, shown on the map as Sedgmoor Place, and set into
12 a dry riser on the west side. Mr Howling was also on
13 the west side, the same side as them; is that right?

14 A. That's correct.

15 Q. You mentioned a grass area. We can see some grass in
16 the area I'm marking with my arrow. So he would have
17 been somewhere in that area --

18 A. That's correct.

19 Q. -- lined up with the central staircase; is that right?

20 A. That's right.

21 Q. Thank you. And you stood there with him?

22 A. Initially -- I stood there with him first of all --
23 sorry, no, first of all, I would have been getting my
24 gear on, because as a driver, you're not allowed to
25 drive rigged. So he would have left me, and that's

1 where I found him, first of all. So I would have got my
2 gear on and then gone straight to him afterwards.

3 Q. Looking back at the map that you drew shortly after the
4 event, which indicates where your appliance was parked,
5 we can see, I think, that your appliance was not parked
6 right next to where Mr Howling stood as incident
7 commander.

8 A. That's correct.

9 Q. Can you just help the jury with how it would work in
10 practical terms, getting messages, relaying them to
11 Mr Howling and then relaying messages from him back to
12 brigade control?

13 A. Right, well, normally on that day, I would have used my
14 own machine. So I would have used Echo 351 and used the
15 radio on that machine to send the messages. But because
16 Peckham's machine was closer, I decided to use that. So
17 any messages that needed to be sent would be -- I sent
18 from that machine initially, if that -- does that make
19 sense?

20 Q. It does. What about messages sent by control to E351?

21 A. At the time -- it's a new system we've got now, but at
22 the time, even though they were sending messages to
23 Echo 351, I would have been able to -- I would have been
24 able to hear those messages on Peckham's machine. Does
25 that make sense?

1 Q. It does make sense. I just want to make sure we're all
2 absolutely clear about this. So a message sent by
3 control where they say "E351", and E351 says, "Proceed",
4 and then the message is given, you can hear that not
5 only when you're in E351 but also when you are at
6 Peckham pump E371?

7 A. Yes. Any of the machines with radios on, I would be
8 able to hear my call sign so I would know that they were
9 trying to contact me.

10 Q. But what about hearing it on personal radios?

11 A. No.

12 Q. So in summary, messages that are addressed to
13 an appliance can be heard on any other appliance?

14 A. Yes, they can.

15 Q. So when you took up this role of passing messages from
16 Watch Manager Howling to brigade control and from
17 brigade control to Watch Manager Howling, which
18 appliance did you use to do that?

19 A. I used Peckham's appliance, because it was closer.

20 Q. How close was that to where Watch Manager Howling was,
21 and in particular did you have to keep walking to and
22 from the appliance or could you stay in the same place?

23 A. No, you can stay with the appliance and use your
24 handheld radio. So I've got a handheld radio on the
25 front of the machine. If the watch manager had

1 a handheld radio, I could get in contact with him.

2 Q. So in order to listen to messages on the appliance and
3 send messages on the appliance, you would have to be
4 standing somewhere that wasn't right next to
5 Watch Manager Howling; is that right?

6 A. I could sit on the machine, the front of the machine,
7 and listen to messages being sent by his handheld radio
8 to me.

9 Q. That's the point I'm getting at. When you're at the
10 appliance listening to messages from control and sending
11 messages to control, in order to communicate with
12 Watch Manager Howling, you're using a personal radio?

13 A. That's correct.

14 Q. Rather than speaking to him face-to-face?

15 A. Later than on I did speak to him face to face, but
16 initially it was by handheld radio.

17 Q. Is it right that you began to hear messages from control
18 about people in flats and to hear flat numbers?

19 A. That's correct.

20 Q. From what you've been saying to us, those could have
21 been messages that were addressed to E351 or to another
22 appliance?

23 A. Could be to another appliance, but it would be to us
24 because Watch Manager Howling was the officer in charge,
25 so they would be sending it to Echo 351.

1 Q. You probably recall there came a time when there was
2 a command unit, command unit 4, CU4, set up. Would you,
3 on E371, be able to hear messages between brigade
4 control and CU4?

5 A. I would be able to, but at the time the command unit, if
6 I recollect, wasn't set up yet.

7 Q. After it was set up, is it your evidence that you were
8 able to hear the messages that were being addressed to
9 it?

10 A. At the time I was retasked to do something else but on
11 normal occasions, if I hadn't been doing something else,
12 I would -- any radio traffic I would have been able on
13 hear on the machine, coming from the command unit as
14 well as from any other machines.

15 Q. So when you're sending messages to and from appliances,
16 you can hear on any appliance -- you're including in
17 that messages from or to a command unit?

18 A. That's correct.

19 Q. Thank you. The messages that you were getting in which
20 you heard flat numbers, what did you do with them?

21 A. Once I -- once I got information, I think, if
22 I remember -- if I recollect, I got a message saying
23 that there was people trapped in whatever the number
24 flat -- flat was. I wrote that down, but then soon
25 afterwards there was -- before I got a chance to relay

1 that message, another message came through with another
2 flat number, and then another. So I decided to, rather
3 than go onto me handheld radio, hold off for a bit, make
4 sure I've got all the numbers correctly, and then
5 I had -- sorry.

6 Q. I'll going to try and take this point slowly, so we are
7 clear.

8 A. Yeah.

9 Q. You received a message about a flat number, for example,
10 for the first time. You say you would have made some
11 kind of note of it -- we'll go back to that in
12 a moment -- and then you would have heard another
13 message with another flat number. Would you then have
14 written on the same sheet of paper something about the
15 second flat number, or did there come a point when you
16 had multiple bits of paper?

17 A. No.

18 Q. Or did you create a fresh piece of paper at the end of
19 this process?

20 A. No, I started with one sheet of paper off the message
21 pad and wrote down the numbers as they came.

22 Q. Did there then come a time when you sought to pass those
23 numbers on to somebody more senior than yourself?

24 A. Yes, I -- I decided then to take them to
25 Watch Manager Howling, but rather than sending them over

1 the handheld radio, I thought it was important enough to
2 take them over to the watch manager.

3 Q. So that was at a point that you chose when you had built
4 up several numbers and written them down, is that right?

5 A. That's right, it was a very short space of time.

6 Q. Was that on a single sheet of paper, or more than one
7 sheet of paper?

8 A. It was on one sheet of paper.

9 Q. As best you can, can you tell us what was written on
10 that sheet of paper? I'm not asking what the numbers
11 were, first, what I'm trying to get at is: was it simply
12 a series of numbers, or was there more written down than
13 just the numbers of flats, if you can remember?

14 A. If I can remember -- if I remember correctly, it was the
15 numbers, and just above it, "People trapped," and then
16 the flat numbers written underneath.

17 Q. In my own mind, rightly or wrongly, I'm getting an image
18 of a piece of paper with "People trapped" written at the
19 top?

20 A. That's correct.

21 Q. And then several flat numbers written underneath?

22 A. That's correct.

23 Q. If that's correct, the phrase, "People trapped" is
24 heading the sheet of paper, and it's not specifically
25 attaching to one or more flat numbers, is that right?

1 A. No, it's just them numbers that were underneath it.

2 Q. So that's what the members of the jury should have in
3 mind, a single sheet of paper, with the words, "People
4 trapped" and then some flat numbers underneath?

5 A. Yes.

6 Q. What did you do with that piece of paper?

7 A. I took it to Watch Manager Howling. At the time when I
8 got to Watch Manager Howling -- would you like me to?

9 Q. Yes, please go on.

10 A. When I got to Watch Manager Howling, he was being
11 bombarded with information, quite a lot of people
12 standing round him, so -- not that he particularly
13 wanted to ignore me, but I had to be quite forceful with
14 the information that I had. Once I got his attention,
15 I went over the -- the information I had on -- on the
16 sheet of paper, and he immediately said to me that I
17 should give that information to Watch Manager Payton,
18 Chris Payton.

19 Q. Just pausing there, you said that you went over the
20 information that you had with Watch Manager Howling.
21 Does that mean that you discussed it with him?

22 A. Very -- very quickly, just that he understood that that
23 was people in their flats that couldn't get out, and
24 then -- so then he said, "Right, okay, I'm setting up
25 a bridgehead, Watch Manager Payton's going to be in

1 charge of that, pass on the information to him."

2 Q. Did you physically show the piece of paper to

3 Watch Manager Howling, did he look at it?

4 A. Yes.

5 Q. But I think from what you said he didn't keep it, is

6 that right?

7 A. No, he didn't.

8 Q. What did happen to the piece of paper?

9 A. I then went over to Chris Payton and gave him the piece

10 of paper.

11 Q. Did you say anything to him about it?

12 A. I just basically went over the same information that I'd

13 given Watch Manager Howling and then returned back to --

14 back to the officer in charge.

15 Q. Did you show the piece of paper to Mr Payton?

16 A. Yes, I showed him it and gave it to him.

17 Q. Sorry to do this in so much detail --

18 A. That's okay.

19 Q. -- but when you imagine an A5 piece of paper like this

20 with text written on it, when you showed it to him, did

21 you show it to him in a form with the text visible, or

22 for example was it folded up?

23 A. No, it was visible.

24 Q. It was visible?

25 A. Yes, it was open.

1 Q. Did he look at it?

2 A. He did, yes.

3 Q. Did he ask you any questions about it?

4 A. No.

5 Q. Can you remember how many flats were on it?

6 A. No, I'm sorry, sir, I can't.

7 Q. Can you remember today the numbers of any of the flats
8 that were on there?

9 A. No, I'm sorry, sir, I can't.

10 Q. Do you recall making a statement about nine days after
11 the fire?

12 A. Yes.

13 Q. Was your memory at that time of events better than it is
14 today, some three and a half years later?

15 A. Yes, it would be, yes.

16 Q. Would it assist you to have a look at the statement?

17 A. Yes, please.

18 Q. It starts at page 211 in the witness statements bundle.
19 (Handed) I've put up the first page on the screen. If
20 you could just have a look at that and confirm that that
21 is your statement, dated 12 July 2009?

22 A. It's my statement, yeah.

23 Q. I'm going to ask you to look over the page at 212.
24 Where I've marked with my arrow on the screen, near the
25 second holepunch on the page, do you see your statement

1 says this:

2 "As I was sending these messages, I was getting
3 messages from control telling me that there were people
4 in flat numbers 78, 79, 80, 81 and 57. I recorded these
5 numbers in my notebook. I relayed the flat numbers to
6 Watch Manager Howling, and he asked me to make a note of
7 the flats, which I had already done.
8 Watch Manager Howling told me to relay this information
9 to Watch Manager Payton who had joined us. He was from
10 Southwark fire station. I wrote down the flat numbers
11 again and gave them to Watch Manager Payton."

12 Just pausing there, on that final point, the
13 impression given in the statement is that you created
14 a second sheet with the numbers on it to give to
15 Watch Manager Payton, do you remember that?

16 A. I do not recall that. I may well have done, but I do
17 not recall that.

18 Q. Your recollection today is as you told the court
19 earlier, that you had a single sheet which you showed to
20 Watch Manager Howling, he asked you to give it to
21 Watch Manager Payton and you gave it to him and in
22 a form where he could see it and looked at it?

23 A. Yes.

24 Q. You've seen that the statement that you made on
25 12 July 2009 gave the numbers of five flats, does that

1 refresh your memory at all, that there were five flats?

2 A. No, it doesn't, sorry.

3 Q. You'll see the numbers given in the statement, nine days
4 after the fire, were 78, 79, 80, 81 and 57. Does that
5 refresh your memory at all?

6 A. At this particular day I can't remember what the numbers
7 were, if that's what I wrote in my statement then I'm
8 sure that must be correct.

9 Q. So that was your memory on 12 July 2009?

10 A. Yes.

11 Q. Are you able to remember whether you were shown
12 anything, or prompted in any way, in your recollection
13 on that date to give those numbers?

14 A. Sorry, I don't understand the question, can you repeat
15 that?

16 Q. It's difficult, I know, but do you think that on
17 12 July 2009, when you gave the statement, you recalled
18 these numbers straight away from memory, or can you
19 remember if you were shown anything or told anything or
20 prompted in any way to remember those numbers?

21 A. I'm sorry, I -- I can't remember.

22 MR MAXWELL-SCOTT: Madam, it's just after 1 o'clock.

23 THE CORONER: Yes, is this a convenient stopping point?

24 MR MAXWELL-SCOTT: I think it is.

25 THE CORONER: Yes, all right, we'll have a break for lunch

1 now. Mr Mullins, you're half way through giving your
2 evidence, and the strict rule is you must not talk to
3 anyone at all about your evidence or about the case.

4 A. I understand.

5 THE CORONER: So the safe thing is to have lunch by
6 yourself. Can you be back please to continue at 2.05?

7 Thank you.

8 Members of the jury, we'll continue at 2.05. Thank
9 you very much.

10 (1.03 pm)

11 (The short adjournment)

12 (2.05 pm)

13 THE CORONER: Thank you. Yes, Mr Mullins, you're giving
14 your evidence on oath. Can we ask the jury to come back
15 in, please.

16 (In the presence of the Jury)

17 THE CORONER: Yes, thank you.

18 MR MAXWELL-SCOTT: Mr Mullins, before the adjournment we
19 were looking at your witness statement and you will
20 recall that in it -- in your statement dated
21 12 July 2009 -- your recollection was that you recorded
22 five flat numbers and that those numbers were 78, 79,
23 80, 81 and 57. What I'm going to do with you now is to
24 look at some of the radio messages that were being
25 passed on the afternoon of the fire to see what flat

1 numbers were referred to in them. If we could firstly
2 have a look in the advocates' bundle, file 1 at
3 page 395. (Handed)

4 Just to explain what this is, this is a transcript,
5 a typed-up copy, of radio traffic between Vicki Barnet,
6 who worked in the control room at brigade control and
7 mobiles attending the Lakanal incident, so units. It's
8 timed at 16.36.44. You can see that on the top left.

9 A. Yeah, I see that.

10 Q. For the benefit of members of the jury, this is
11 summarised in the sequence of events at the top of
12 page 4. In this message between brigade control and
13 E351, in around the middle of it, we can see reference
14 to Watch Manager Howling making pumps six. That would
15 have been you passing on that message?

16 A. I would have been sending the message, yeah, on behalf
17 of him.

18 Q. Thank you. Then just below that we get VB1, which is
19 Vicki Barnet, saying to you:

20 "We've got some information regarding residents that
21 are trapped in their flats. In flat 68, six, eight,
22 caller is trapped in their sitting room, and in flat 79,
23 seven, nine, they cannot open the front door to get out
24 of the property. Both flats smoke-logged."

25 Then you confirm that you've received that message.

1 A. Yeah, that's correct.

2 Q. So that was 16.36.44, and that would have given you flat
3 numbers 68 and 79. Then, just at the bottom of that
4 box, you see there's reference to further traffic and
5 Vicki Barnet then says:

6 "Just for your information we're also receiving
7 a call from flat 80, eight, zero, regarding heavy
8 smoke-logging. Over."

9 Then you see below a continuation of above. You
10 say:

11 "All received. Over."

12 A. Yeah, I can see that.

13 Q. So at that point, on that basis, you would have been
14 able to write on your notepad numbers 68, 79 and 80.

15 A. Yeah.

16 Q. We then go on to page 397. I'm looking now at the entry
17 at 16.46.16. This is also in the sequence of events at
18 the top of page 14. The second thing recorded at that
19 time said by VB1 was this:

20 "For your information, we've also got smoke going
21 into flat 57, five, seven, on the 9th floor level.
22 There's a young baby inside the flat with persons.
23 Please check flat. They are upstairs in the flat.
24 Over."

25 Echo 351 -- we assume this is you again; is that

1 right?

2 A. Yes.

3 Q. You say:

4 "Say again after flat 57."

5 And then Vicki Barnett said:

6 "Answer yes. Flat 57 on the 9th floor. There is

7 a young baby inside with persons with smoke-logging.

8 Over."

9 And you confirmed that you had received that

10 message.

11 So that would have got the number of flats to four,

12 and would have been 68, 79, 80 and 57. Then if we go to

13 page 345.

14 THE CORONER: Sorry, 345?

15 MR MAXWELL-SCOTT: 345, yes, in the same bundle.

16 THE CORONER: Thank you.

17 MR MAXWELL-SCOTT: For the benefit of the members of the

18 jury, this one is summarised on page 17 of the sequence

19 of events, 16.49.49. This is a typed-up version of the

20 conversation between Paul Real from control room and

21 command unit 4. You told the jury before the

22 adjournment that you would have been able to hear from

23 your appliance radio traffic between control and the

24 command unit. That's right, isn't it?

25 A. I don't recognise any of that. That doesn't look like

1 normal radio traffic that we get, especially the way
2 they're speaking as well to each other. That sounds --
3 that almost looks like a phone call conversation. So --
4 we wouldn't normally talk like that on the radio, so
5 I don't understand why ...

6 Q. I see the point you make and in due course we'll hear
7 evidence about whether it is a radio message or a phone
8 call.

9 A. Right.

10 Q. But at this stage, if I can just draw your attention to
11 the fact that here we've got flats 68 and 79 in the
12 fifth line, and then, further down, where my cursor is,
13 we now have reference to flats 82 and 80.

14 A. I see that, sir, yeah.

15 Q. So if you had heard that conversation, or if the
16 contents of it had in some way been passed to you, then
17 as at around 16.50 hours, you would have had five flat
18 numbers that you could have written on your pad, and
19 they would have been 68, 79, 80, 57 and 82. Your
20 statement on 12 July 2009 gave 78, 79, 80, 81 and 57.
21 Comparing those two lists in your head if you can, three
22 of those numbers match. So 79, 80 and 57 were in radio
23 traffic and also in your witness statement.

24 A. Yeah.

25 Q. In your witness statement you gave 78, which -- I would

1 ask you to comment -- you may think is a misrecollection
2 of the number 68 that we've seen in the radio traffic,
3 and the one number which is in your statement which
4 isn't in radio traffic is 81. At the time that you gave
5 your statement, would you have been aware that five
6 people had died in flat 81 in the course of the fire?

7 A. I can't recall that, no. I wouldn't ...

8 Q. I think that's as far as we can take trying to compare
9 your recollection in your witness statement with what
10 messages were in fact being passed over the radio at
11 this time.

12 You told us before the short adjournment that you
13 gave the sheet of paper to Watch Manager Payton. Did
14 you see what he did with it?

15 A. No, I didn't, no.

16 Q. Your statement refers to the fact that there came
17 a point when one of the officers of the command unit who
18 was present at the scene told you that after making
19 pumps eight, the command unit would take over sending
20 messages. Do you remember who was present in the area
21 where Watch Manager Howling was from a command unit?

22 A. No. There were several people there at the time.

23 I can't remember who it was who said that, sorry.

24 Q. Do you remember if they were passing any messages about
25 flat numbers to Watch Manager Howling?

1 A. I -- I never personally heard them passing the
2 information like that.

3 Q. Do you remember being part of or overhearing any
4 conversations about where in the building the flat
5 numbers that were being mentioned were to be found?

6 A. No.

7 Q. Just to be clear on that, are you saying you don't
8 remember one way or the other, or your recollection is
9 that you didn't hear any such conversations?

10 A. My recollection is that I didn't hear any conversation
11 like that, talking about numbers.

12 Q. Just in the interests of completeness, is it possible
13 that such a conversation could have taken place between
14 Watch Manager Howling and others which you didn't
15 overhear, for example because you were back by the
16 appliance?

17 A. That possibly could have happened.

18 Q. Do you recall being part of or overhearing any
19 conversation involving Watch Manager Howling, where he
20 and one or more other people looked up at the building,
21 looked up at the west side, and commented on what they
22 could see?

23 A. I can remember standing there with Watch Manager Howling
24 and we was trying to work out how many floors up,
25 roughly, the flat was that was alright.

1 Q. I'm going to show you some photographs now. These are
2 also in the sequence of events. You just talked about
3 the flat that was alight. Let me show you some
4 photographs relating to that point. That is 16.40.
5 Essentially, from shortly after when you arrived, you
6 were on that access road either by the Peckham appliance
7 or talking to Watch Manager Howling.

8 A. That's correct.

9 Q. Until you were given other tasks, which we haven't come
10 to yet?

11 A. That's correct.

12 Q. If you look at this photograph. I accept, of course,
13 it's a close-up photograph, but if you look at that.
14 This is 16.42.12. Looking at it in this way, it's
15 clear, isn't it, that there is more than one flat which
16 has a fire affecting it?

17 A. From that photograph it looks to me like it's two flats,
18 but you could say -- you could say that that was
19 a ground floor and a first floor flat, as well. Does
20 that make sense?

21 Q. I understand what you --

22 THE CORONER: I don't really understand. Could you just
23 explain?

24 A. Where you can see the actual flames, that could be
25 one flat, and where there is no flames below but

1 something has been burnt out, madam, you can see that
2 could either be two flats or that could be a ground
3 floor and a first floor, say, bedroom.

4 THE CORONER: I see.

5 MR MAXWELL-SCOTT: If I take you on to 16.46.11. This is
6 three seconds before the call about somebody in flat 57.
7 Does that look like one flat on fire, or more than one?

8 A. As I said before, I think it looks like one flat alight,
9 but it could be two, because one could be ground floor,
10 one could be first floor.

11 Q. I'll just take to you an exterior photo of the building,
12 to get our bearings. The photo we were looking at had
13 two exterior panels on fire, didn't it?

14 A. Yes.

15 Q. You can see more clearly here that in between those two
16 there is a floor with a balcony, so with a different
17 configuration?

18 A. Yeah, I can see that.

19 Q. So going back to the previous photograph, one view of it
20 is that you have three floors on fire. You have the one
21 with the very intense fire, then you have a balcony
22 level underneath it, and then underneath that you have
23 the flat which I'm pointing to with my white arrow.

24 A. I can see what you're saying. The photographs are not
25 that clear because it's a close-up. But also what I

1 would say is that because I don't know the particular
2 layout of the building, it's very hard to say whether
3 that looks like one flat or two flats.

4 Q. If I show you a photo of just a minute later, perhaps
5 a little clearer.

6 A. From that photograph, sir, I would say that that does
7 look like two flats.

8 Q. Do you remember being part of, or overhearing, any
9 conversation about the upper flat in that photograph
10 which I'm pointing to with my arrow?

11 A. No, I can't remember.

12 Q. Again, does it follow from your previous answers that it
13 is possible that Watch Manager Howling was involved in
14 such conversation but you didn't overhear it because you
15 were by the fire engine?

16 A. I could have been sending messages or I could have been
17 going over to put my fire gear on.

18 Q. You mentioned putting on your fire gear. Did there come
19 a time when you were tasked to do something different
20 from what you had been doing? You had been passing
21 messages from Watch Manager Howling to control.

22 A. Yeah, I think once -- once the command unit had turned
23 up and they were going to take over the sending the
24 messages, Watch Manager Howling had a discussion with me
25 about whether they could get an aerial in that side to

1 fight the fire from an aerial appliance.

2 Q. Was that something that you had some previous experience
3 of and were able to comment on?

4 A. Yeah, I'm -- I'm trained in aerials -- use of aerials,
5 TLs and ALPs for the London Fire Brigade.

6 Q. What was your view, as you expressed it to him?

7 A. I believed you could get one down there at squeeze but
8 there were a lot of parked cars in the way.

9 Q. Were attempts then made to move an aerial ladder
10 appliance?

11 A. I think at the time while we were discussing to do such
12 a thing, that's when we heard the scream from the crowd
13 and things changed.

14 Q. Which side of the building was that on?

15 A. That was on the opposite side, so it would be on the
16 east side of the building.

17 Q. Did you go round to see what was happening?

18 A. Everyone did. Most -- I say "everyone". Most people
19 went round that side to see what was going on.

20 Q. What was there?

21 A. There was a very big crowd looking up at the building,
22 and we could see -- I think it was several people at
23 different windows, but what I particularly noticed were
24 a family, a black gentleman and, I believe, his wife and
25 their baby. It looked like he'd tied some sheets

1 together and possibly they could jump.

2 Q. I'm going to show you a photograph that may assist in
3 prompting your memory. Do you see there --

4 A. Yes.

5 Q. -- a black man, a black woman and then a yellow sheet or
6 piece of fabric?

7 A. That's what I thought it was. I thought it was sheets
8 that they had tied together, sir.

9 Q. So that's what you're remembering?

10 A. Yes.

11 Q. That that was what had attracted all the attention.

12 A. The scream was so loud -- it was almost like a football
13 crowd scream, it was that loud. You could hear it over
14 all the appliances and everything that was going on.

15 Q. What was then done with the aerial ladder platform?

16 A. It was then decided that we should maybe perhaps try and
17 get the aerial round to the other side of the building
18 to see if we could get to these people on that floor.

19 Q. I think that around the time of your witness statement
20 you did a map, the one we looked at earlier, that was
21 intended to show where it ended up. I think the "B" on
22 this map, which I'm marking with the white arrow -- is
23 that where --

24 A. Yeah, that looks correct, yeah.

25 Q. Is that where it was positioned?

1 A. Yes.

2 Q. Were you then asked to do something with it?

3 A. I was asked by -- because effectively then I hadn't got
4 a specific job to do then, because when you first start
5 the job you're the radio operator for the officer in
6 charge. Once the command unit took that over,
7 Watch Manager Howling knew that I was trained in using
8 aerials, so he said for me to go off with the other two
9 people that were designated that day to ride the aerial,
10 to help them set the aerial up on the other side of the
11 building.

12 Q. Were you asked to go up in it?

13 A. Yes.

14 Q. On your own, or with someone else?

15 A. With another firefighter.

16 Q. Was that Firefighter Sharpe?

17 A. That's correct.

18 Q. Was there an attempt to use the aerial ladder platform
19 to rescue them?

20 A. There was, but it was more to do with getting them to
21 say where they were, because we soon assessed that we
22 wouldn't be able to get close enough to the building to
23 be able to reach them because of the limits of the ALP.

24 Q. Was it easier to talk to them from up the aerial ladder
25 platform cage than from ground level?

1 A. Definitely. I think that's what stopped them from
2 jumping.

3 Q. Did you speak to them yourself?

4 A. Yes, we did.

5 Q. Did they say anything to you that particularly sticks in
6 the memory?

7 A. Basically, it was mainly that they wanted to get out and
8 we were shouting out back to them that -- to just stay
9 where they were, that there were crews coming to get
10 them.

11 Q. Were you still in the aerial ladder platform when crews
12 arrived to get them?

13 A. Yes, we were, yeah.

14 Q. Did you witness them being rescued?

15 A. No, no, 'cos I think they'd already gone in by them and
16 I -- for the crews to see them and take them out.

17 Q. I didn't quite follow that.

18 A. Well 'cos that -- I think it's like a balcony or
19 a window or whatever they were standing on. They'd gone
20 back into the flat.

21 Q. You didn't see them leave along the balcony?

22 A. I didn't -- no, I didn't see them leaving the balcony,
23 no.

24 Q. Did you then return to ground level?

25 A. No, we stayed up there, first of all, because we set the

1 aerial ladder platform up as a water tower to fight any
2 fires that we needed to fight.

3 Q. So you were firing water jets from the aerial ladder
4 platform?

5 A. Yes, but only once we realised that there were people
6 out the way and there wasn't crews and it wasn't anyone
7 in danger.

8 Q. Later on, did you discover that the family that you had
9 seen on the balcony had indeed been rescued?

10 A. Yes, we had a message relayed back up to us that they
11 had been rescued.

12 Q. Your witness statement on page 214 says:

13 "I've never experienced a fire like this. Time
14 moved really fast. I've seen plenty of flat fires in my
15 career, but none like this."

16 A. No, it was -- it was really strange. I've never seen
17 a fire progress so quickly, not only up and down but
18 horizontally as well.

19 Q. My final significant topic is about awareness that you
20 may have built up of certain features of Lakanal House
21 during the course of the afternoon that you were there
22 fighting the fire.

23 Firstly, did there come a time when you learned that
24 the flats were maisonettes, on two floors, with internal
25 staircases?

1 A. No.

2 Q. Did you ever learn that the upper floors in flats
3 extended the full width of the building and therefore
4 had windows both on the east side and the west side?

5 A. No, I didn't know that, sir, no.

6 Q. Did you learn that the balconies which you would have
7 been able to see, certainly when you were up in the
8 aerial ladder platform, provided escape routes to
9 a central staircase through a door?

10 A. I only realised that afterwards, after the job was over
11 and we went inside the building to have a look and
12 realised that the balconies went right the way across.

13 Q. That was late into the evening, was it?

14 A. Yes, because you couldn't -- and the next day. I think
15 we were back the next day as well.

16 Q. If you look at what I have up on screen now, that's
17 a representation of the west side of Lakanal House
18 looking from ground level.

19 A. Yeah.

20 Q. I'm now going to put over it a representation of flat
21 numbers. Just take a moment to have a look at that.

22 A. Okay.

23 Q. Did you, at any point, start to build up a mental
24 picture of where flat numbers were in the building that
25 looked like that?

1 A. Sometimes a lot of these flats, you wouldn't be able to
2 see them because of the smoke anyway. There was a lot
3 of smoke. No, I never got a mental picture of that, no.

4 Q. Do you remember ever seeing a sign in the ground floor
5 area of the building that provided information about
6 what flat numbers were on what floors?

7 A. If I can remember, I don't -- I didn't even go that far
8 in the building, so I wouldn't be able to comment.

9 Q. Thank you. My final question is this: if you reflect
10 back on your own involvement in fighting the fire and
11 the tasks that you were given and carried out, can you
12 think of one thing that would have most helped you to
13 carry out those tasks?

14 A. I'd say the -- probably one of the main things is
15 parking. The parking was horrendous there. So having
16 to, as a firefighter, move cars out of the way
17 physically by bouncing them up and down, to get the cars
18 out the way to get appliances in, was probably one of
19 the main factors.

20 Q. Did that occur with the aerial ladder platform?

21 A. Well, that and -- with the aerial ladder platform, it's
22 a case of the further up you want to go, the closer you
23 want to be to the building. All right, it's an old
24 building but a lot of them are designed with greens and
25 with bollards around and you can't get close enough to

1 the buildings to be able to use the vehicle to its full
2 potential.

3 Q. Thank you. Those are all my questions, but others will
4 have some for you.

5 THE CORONER: Thank you.

6 Questions by MR EDWARDS

7 MR EDWARDS: Mr Edwards, on behalf of some of the families.
8 Mr Maxwell-Scott was asking you about radio
9 transmissions and radio messages you received. Can I
10 ask you to turn to page 395, please, of the advocates'
11 bundle. Can we have that on screen as well. We can see
12 at the top of the page, the top box, large box, there
13 are messages between control and you, which is E351,
14 with flat numbers.

15 You said in response to Mr Maxwell-Scott's questions
16 that at the time you were not using the radio on your
17 own appliance but were using the radio on another
18 appliance?

19 A. That's correct.

20 Q. Would you have been using the call sign to your own
21 appliance when you were using the radio on another
22 appliance, or would you have been using that appliance's
23 call sign?

24 A. I know it sounds weird, but I would be using Echo 351
25 call sign, but I'm on a different appliance.

1 Q. So if we go to page 394, please, the second entry down
2 at 16.33, E372, that entry saying there is someone
3 trapped in flat 79, that is not you?

4 A. I wouldn't have used that call sign, no.

5 Q. Can we turn to page 397, please. Mr Maxwell-Scott
6 showed you some photographs of the building from the
7 outside with the fire at different parts, and asked you
8 to say which flats you thought were alight, how many
9 floors were alight. If I direct you to the entry at
10 16.45, M2FS, we have a transmission from E351. That's
11 you, isn't it? The top box?

12 A. Yeah, that must be me, yeah.

13 Q. And under that, VB1:

14 "Echo 351, go ahead with message. Over."
15 That's control. Then, underneath that, E351:
16 "FS Echo 351 from Watch Manager Howling at
17 Lakanal House, Dalwood Street, SE15. A residential
18 block of 12 floors, 20 metres, 20 metres by 60 metres,
19 60 metres. Ten per cent of 9th, 10th, 11th and 12th
20 floor alight."

21 So does that sound right, that at 16.45 you were
22 transmitting a message that 10 per cent of the 9th,
23 10th, 11th and 12th floors was alight?

24 A. I would say that's me sending that, yes.

25 Q. I appreciate you may not have known exactly how the

1 floor numbering would have worked, but it probably goes
2 without saying that's the fire floor and the three
3 floors above it that you thought were alright?

4 A. Yes.

5 Q. At 16.45, therefore, it's essential to get anyone out of
6 those floors above the fire that you're transmitting are
7 alright?

8 A. Yes.

9 Q. Can we have page 345 of the advocates' bundle up on
10 screen, please. This was the document that you thought
11 was probably a telephone record rather than a radio
12 message.

13 A. It makes me think that because of the language they're
14 using, yes.

15 Q. What do you mean by that?

16 A. Well, you have proper procedures in radio procedures
17 that you have to use, and that is just like a normal
18 conversation you'd have with person to person on a
19 phone.

20 Q. So they're not saying "over" and things like that?

21 A. Yeah, and you wouldn't say, "Hello, mate."

22 Q. This might sound a silly question, but if it's
23 a telephone call between CU4 and PWR, how does that
24 work? Is there actually a telephone on the outside of
25 CU4?

1 A. They have -- I believe they have mobile phones that they
2 use.

3 Q. Do say if you don't know, but if it's a telephone call,
4 presumably you can only hear, at the very most, the
5 person speaking at your end? You can't hear what is
6 being said on the other end?

7 A. I probably wouldn't hear any of that -- probably not
8 hear any of that conversation.

9 Q. Is a radio message different in that it comes out over
10 a small loud speaker so that people standing round can
11 all hear it?

12 A. Yeah, you've got a radio speaker inside the cab of the
13 appliance, so if anyone was -- the volume was turned
14 right up, someone standing near the cab of the fire
15 appliance would be able to hear it, or you're sitting
16 inside.

17 Q. So I think it follows from that, certainly looking at
18 this page, 354, you're unlikely to have got numbers 68
19 or 82 from this telephone call?

20 A. Certainly not from that, no.

21 Q. May I turn you back to page 212 in the witness statement
22 bundle, which is your statement. I appreciate you've
23 been -- do you have a copy? (Handed) I appreciate
24 you've been referred to this document a number of times
25 by Mr Maxwell-Scott, and we are now three and a half

1 years after the fire, so it's quite difficult to
2 remember.

3 A. Yeah.

4 Q. But what you say at page 212, which is on 12 July 2009,
5 so about nine days after the fire, is that you had
6 messages from control telling you that there were people
7 in flat numbers 78, 79, 80, 81 and 57.

8 A. I'm sure if I wrote that down in my statement that's --
9 that is what I heard.

10 Q. And that's what you remembered on 12 July?

11 A. Yes.

12 Q. Were you aware at any time that the people in the
13 flats -- any of the people in the flats, the flat
14 numbers that you wrote down -- were making something
15 called fire survival guidance telephone calls or being
16 given fire survival guidance by control?

17 A. I believe that's standard procedure, so ... But that is
18 something that they would do at control. They would
19 talk them through it.

20 THE CORONER: We just need to know what you know from your
21 own knowledge.

22 A. No, then.

23 THE CORONER: You weren't aware?

24 A. No.

25 MR EDWARDS: Did you know whether they were people who

1 simply needed reassuring, or whether they were people
2 who were actively in danger?

3 A. I wouldn't be able to tell the difference, unless
4 control told us themselves in a message.

5 Q. As far as you remember --

6 A. Yeah.

7 Q. -- did control tell you any of these people were
8 actively in danger?

9 A. No.

10 Q. I'm going to move on now and ask you briefly about the
11 positioning of the aerial ladder platform. I just want
12 to get this clear in my head to make sure I've
13 understood your evidence. Initially, the aerial ladder
14 platform from Old Kent Road was going to go on the west
15 side of the building?

16 A. That's correct.

17 Q. And that's the side with the small service road?

18 A. That's correct.

19 Q. And it could have got right up to the building,
20 effectively, to the bottom of the building?

21 A. It certainly would have been able to have got closer on
22 the other side, yes.

23 Q. The jury are likely to see photographs of this in due
24 course, but when it was eventually positioned on the
25 other side of the building, it was some distance from

1 the building, because of the layout of the ground
2 outside the building on the east side?

3 A. Yes, it was.

4 Q. I think there were bushes or trees or something in the
5 way?

6 A. There was a green area in the front and there was
7 bollards. What I'd also like to point out as well is
8 that aerial ladder platforms and TLs -- you're not
9 really meant to put them on the pavement. There was
10 a bit of a discussion beforehand whether or not we
11 should do that, and because we wanted to get it up as
12 close and as quick as possible to the people in the
13 balcony, we decided to put it on the pavement there.

14 Q. To get it on the pavement, you had to bump a parked car
15 that was blocking access to the pavement out the way; is
16 that right?

17 A. I think it was probably more than one car. Several
18 cars.

19 Q. Did you physically help move the car?

20 A. Yes.

21 Q. I appreciate it's difficult, but can you give us
22 an estimate of how long it took you to move the car, or
23 the cars, as you've said, that were blocking access to
24 the pavement out of the way?

25 A. I would say it's probably at least five minutes.

1 Q. Thank you.

2 THE CORONER: Mr Dowden?

3 Questions by MR DOWDEN

4 MR DOWDEN: Good afternoon, my name's Dowden. I ask
5 questions on behalf of Mr Francisquini.

6 THE CORONER: Mr Dowden, could you move your microphone is
7 closer to you.

8 MR DOWDEN: Yes. We have a glossary. I may refer you to
9 that in a moment, but could you help us with your
10 definition of "smoke-logging"?

11 A. Smoke-logging? Just thick smoke in an area that's built
12 up. Smoke normally mushrooms up, so it mushrooms up to
13 the top where it can't go no further, the ceiling, and
14 then gradually layers itself back down towards the
15 floor. And there's different degrees of smoke-logging.

16 Q. Would you agree that it's smoke to the extent that
17 seeing and breathing are both difficult in the area?

18 A. There are different degrees of smoke-logging, but yes,
19 it could make it hard to see and difficult to breathe.

20 Q. You've been referred to page 395 and a telephone call
21 which you received at 16.36. You were told that during
22 that message that there were two flats which were
23 experiencing smoke-logging.

24 A. Are you talking about the phone conversation or the
25 radio traffic?

1 Q. Sorry, the radio conversations.

2 THE CORONER: Do you want to see it, Mr Mullins?

3 A. Please, madam, yes.

4 THE CORONER: Page 395. (Handed)

5 MR DOWDEN: In the top left hand box, you see flats 68 and

6 79 referred to in there. Do you see that?

7 A. No, sorry, bear with me a second. Can you make it a bit

8 bigger, please.

9 THE CORONER: You might find it easier if you look on the

10 page, Mr Mullins.

11 A. Thank you. Yeah, okay, I see that, yeah.

12 MR DOWDEN: You see right in the top left hand corner

13 there's a timing for that message, and it's 16.36.44.

14 A. Yeah, I see that.

15 Q. And you're referred to two particular flat numbers

16 during that message.

17 A. Yeah.

18 Q. You're also told that there's smoke-logging in those

19 premises.

20 A. Yeah.

21 Q. Did it cross your mind -- did you consider asking which

22 floors those flats were on?

23 A. No, I didn't, sir, no. What I would say to that is

24 I was busy writing down and making sure hopefully that

25 I've got the flat numbers right, so I can then relay

1 that -- relay that to my officer in charge as quick as
2 possible.

3 Q. Of course, and given that there was smoke-logging in
4 those flats, did you immediately attempt to contact
5 Mr Howling and tell him that information?

6 A. If I -- if I can remember rightly, what I did was
7 I wrote them down, and rather than just telling him over
8 the radio I wanted to make sure, so I took the paperwork
9 over to him.

10 Q. The paperwork with just those two flat numbers on it, or
11 other flat numbers?

12 A. I think it was possibly all the -- all the flats.

13 Q. Do you see on page 397 -- do you have that -- that
14 there's a call at 16.46?

15 A. Yeah, I see that, yeah.

16 Q. Which relates to another flat, flat number 57.

17 A. Yeah, I see that.

18 Q. That's some ten minutes after you were first told about
19 the smoke-logging in the other two flats.

20 A. Yeah. I -- all I can say is that I would have relayed
21 that information as well to the officer in charge.

22 Q. But was there any reason why you did not convey the
23 information you got some ten minutes earlier until after
24 16.46?

25 A. Sorry, I don't understand what you mean. Is that

1 different -- that's different flat numbers, though,
2 isn't it, from ten minutes before?

3 Q. It is indeed. Is what you're telling us that you first
4 of all received information about two flats, you stay
5 with the appliance, and then you receive more
6 information about other flats, and it's at least ten
7 minutes, if not longer, before you give that information
8 to Mr Howling?

9 A. Yeah, I can see what you're saying. All I can say is
10 what I remember at the time is taking down information
11 at that particular time and passing it on. If there was
12 any more information later on, be it five minutes or ten
13 minutes later, I would have taken that down and given
14 that to the officer in charge as well.

15 Q. You were asked by Mr Maxwell-Scott about the number 81,
16 and whether that might have been a number which you
17 recalled because unfortunately there were casualties in
18 that flat. Do you recall when you were first aware of
19 the flat number 81?

20 A. No. I'm sorry, sir, no.

21 Q. Do you have any idea as to how that information was
22 relayed to you?

23 A. No, I don't, sorry, no.

24 Q. Thank you.

25 THE CORONER: Thank you.

1 Questions by MS AL TAI

2 MS AL TAI: Good afternoon, Mr Mullins. I act on behalf of
3 one of the bereaved. If I can take you back to your
4 witness statement, please, if you have it before you at
5 page 212.

6 A. Yeah.

7 Q. I just wanted to clarify one thing with you. We've
8 heard evidence from you that you had relayed messages
9 between brigade control and Watch Manager Howling?

10 A. Yeah.

11 Q. And then you were requested to then give that
12 information to Watch Manager Payton?

13 A. Yes.

14 Q. And not long after that, the command unit then took over
15 relaying messages, is that correct?

16 A. That's correct, yeah.

17 Q. At that point when the command unit took over the
18 relaying of messages, did you inform them of the flats
19 that you had written down moments earlier?

20 A. I can only say that I can't remember whether I passed
21 them that information or not.

22 Q. Did you have any discussion with them at the time that
23 they took over?

24 A. No, I don't think so.

25 Q. So you didn't have a conversation with them?

1 A. I don't remember having a conversation with the command
2 unit, no.

3 Q. I see. Thank you.

4 Questions by MR COMPTON

5 MR COMPTON: Good afternoon, I represent Apollo Property
6 Services. Just one matter, and winding back to when you
7 received the information at the station, at the
8 Old Kent Road, about this fire.

9 A. Yeah.

10 Q. You're the driver of the appliance?

11 A. Yes.

12 Q. And you're an experienced firefighter, aren't you,
13 you've been doing it for a number of years?

14 A. Yes.

15 Q. It's only this I wanted to ask you about: I think
16 nowadays you have mobile data terminals, don't you?

17 A. On the machines, yes.

18 Q. On the appliance?

19 A. Yes.

20 Q. And so that the jury -- we've touched on this already,
21 there is a computer within the appliance that you can
22 then go to and get the critical --

23 THE CORONER: Sorry, apparently there's a problem with the
24 computer that the transcribers are using and they need
25 a five minute break in order to sort it out, so let's

1 have a short break to let them do that. So if we're
2 back in this room for 3 o'clock, is that all right?
3 Thank you. Mr Mullins, in the break no talking at all
4 to anyone about your evidence.

5 A. Yes, madam.

6 THE CORONER: Members of the jury, would you like to
7 withdraw? Leave your papers there if that's more
8 convenient.

9 (2.56 pm)

10 (A short break)

11 (3.01 pm)

12 THE CORONER: Thank you, yes. Could we ask the jurors to
13 come back.

14 (In the presence of the Jury)

15 THE CORONER: Thank you. Yes, Mr Compton.

16 MR COMPTON: Mr Mullins, I was just asking you about mobile
17 data terminals. You have one on all the appliances now;
18 is that correct?

19 A. We do now -- we do now, sir, yes.

20 Q. And that contains the critical risk information which
21 you need on certain buildings?

22 A. Yes, it does, yeah.

23 Q. I'm not going to ask you about section 7 and all that
24 side. I just want to ask you this: it's right, isn't
25 it, that fire stations would share information about

1 buildings?

2 THE CORONER: Are you talking about now, Mr Compton, or at
3 the time?

4 MR COMPTON: Madam, that's a correct and good question.
5 Let's look at it in two ways. Going back to 2009, would
6 it be correct that you would share information, risk
7 information, within fire stations as to particular
8 buildings?

9 A. Sometimes, if there's particular risks, I would say,
10 yes. Not always.

11 Q. It would depend on the building, firstly, if it had
12 particular risks, but it would make sense, wouldn't it,
13 to share information if a building had explosives or
14 chemicals or something like that?

15 A. They would make sense to do that, yes.

16 Q. And if you're a nearby station, it would make sense to
17 have information on that building?

18 A. Yes.

19 Q. Yes. And that would be done; would that be correct?

20 A. I can't say whether it would always be done all the
21 time, every single building.

22 Q. Let me approach it another way. Before mobile data
23 terminals came into being, would you have operational
24 folders?

25 A. Yes, we do.

1 Q. And when you attended the fire at Lakanal, was there
2 an operational folder on your appliance?

3 A. There was, yes.

4 Q. We know -- and it's common knowledge -- that there was
5 no information about Lakanal House, I think, in any
6 folders, but the question I have for you is: did anyone
7 on your appliance actually look in the operational
8 folder to see if there was any critical risk information
9 about this building?

10 A. As far as I know, no.

11 Q. You were the driver. Who would have been the person who
12 would have looked at the operational folder to see if
13 there was anything on Lakanal?

14 A. It could have been any of the firefighters or the
15 officer in charge riding on the machine at the time.

16 Q. So no-one did that, but can you give the jury an idea of
17 what was going on as you were driving from Old Kent Road
18 to Lakanal House? For example, was there discussion
19 trying to ascertain a little bit about the building?

20 A. First, as we're driving along, there were -- if
21 I remember rightly, there were multiple -- what they
22 call multiple calls. So that's obviously lots of other
23 people phoning in saying there's a fire. So that was
24 relayed to us while we're en route. Obviously I'm
25 driving, so I'm concentrating what I'm doing. I don't

1 know whether there was a discussion on the back of the
2 machine about whether anyone had been to Lakanal House
3 before, do they know the layout of the building, or
4 anything like that.

5 Q. We've heard evidence from a number of firefighters, but
6 you yourself didn't know the building?

7 A. That's correct.

8 Q. Didn't know the layout, and didn't discover until later
9 on, much later on, that it was maisonettes?

10 A. That's correct.

11 Q. The only other matter I want to ask you is this: you
12 talked about the unusual nature of the fire and the fire
13 spread.

14 A. Yeah.

15 Q. Please say if you can't answer this: this was a hot day,
16 wasn't it?

17 A. It was a very warm day, yes.

18 Q. And there was quite a strong wind?

19 A. There was a very strong wind, especially up the top of
20 the ALP.

21 Q. I say "are you aware"; that's not a good question. Did
22 you see, for example, falling debris catching in on open
23 windows and then causing fires below from where the
24 fires were at floors 7 and 9?

25 A. I can't recollect that -- I can't recollect that

1 happening, no. I can -- I can remember debris falling
2 down, but I could not positively say.

3 Q. Did you clock the fact that residents had their
4 windows --

5 A. Yeah, there were a lot of windows open.

6 Q. Because it was such a hot day?

7 A. Yes.

8 Q. And the wind itself, was it an unusual wind? In its
9 direction and so on?

10 A. I wouldn't be able to tell you which direction it was.
11 You could tell that it was strong but I wouldn't know
12 what direction it was coming from.

13 Q. Thank you very much.

14 THE CORONER: Yes, Mr Walsh.

15 Questions by MR WALSH

16 MR WALSH: Mr Mullins, this is what you said this morning:

17 "I never saw a fire progress so quickly, not only up
18 and down but sideways as well."

19 A. That's correct.

20 Q. Indeed, as Mr Maxwell-Scott has already drawn from your
21 statement, you've made the point that you'd never
22 experienced a fire like this before. The impact of
23 that, the unusual nature of the fire, was that things
24 were happening quickly in relation to --

25 A. Very quickly.

1 Q. -- responses to it. There was quite a bit of
2 information coming in, was there, through radios? Did
3 you hear that?

4 A. There was -- there was a lot of information coming on
5 the radios. There was a lot of information directed
6 towards Watch Manager Howling. Several -- quite a lot
7 of people -- several people standing round him, and you
8 could see that he was trying to deal with lots of
9 different pieces of information all coming from
10 different places.

11 Q. From a pretty early stage?

12 A. Yes.

13 Q. You're familiar with high rise procedure, high rise
14 fires?

15 A. Yes.

16 Q. You're an experienced firefighter. Have you dealt with
17 high rise fires over the years on a number of occasions?

18 A. Yeah, I've been to several high rise fires, yeah.

19 Q. Yes. In relation to a high rise fire in a flat, what
20 would you normally expect in terms of dealing with
21 a high rise fire for the purposes of putting it out and
22 addressing it when it's relating to a flat?

23 A. That it would stay in that compartment. They very
24 rarely spread to another compartment.

25 Q. All right. That's your experience. So you've described

1 the unusual nature of the fire and the fact that
2 responses had to be quick. You've described Watch
3 Manager Howling, when you were trying to get the message
4 to him, being surrounded by people giving him
5 information.

6 A. Yes.

7 Q. And you yourself told us this morning that you had to be
8 quite forceful --

9 A. Yes.

10 Q. -- to break through the rest of the information that he
11 was receiving to pass the messages about flat numbers?

12 A. That's correct.

13 Q. I'm just going to ask you, again, I'm afraid, about --
14 if we look at page 397, first of all, of the advocates'
15 bundle. This is the transcript of radio traffic.
16 You've been asked about this before. I'm going to ask
17 you not just to agree with me, but to look carefully.

18 A. Yeah.

19 Q. The entry that I'm going to take you to is at 16.46.16.
20 You were taken to this a few moments before the
21 adjournment. You can see what it says. Just read it to
22 quietly to yourself for a moment. VB1:
23 "Howling at Lakanal on Havil Street, SE5 ..."
24 Just read that to yourself. (Pause) Done it?

25 A. Yes.

1 Q. It was put to you just before the break -- it was just
2 a misreading, I think, but it was put to you that this
3 was a residential block of 12 floors, so many metres by
4 so many metres, 10 per cent of the 9th, 10th, and 11th
5 and -- it was put to you -- the 12th floors alight.

6 A. Yeah.

7 Q. Right. So that's the position in relation to 16.46.16.

8 A. Sorry, sir -- sorry, sir, I think it actually says 9th,
9 10th and 11th floors alight.

10 Q. So it does.

11 So that was the message at 16.46.16. If you go to
12 the message above that at 16.45.05, we can see that that
13 is a message being reported, E351, from
14 Watch Manager Howling at Lakanal House, Dalwood Street,
15 SE5. A residential black of 12 floors, so many metres
16 by so many metres, 10 per cent of the 9th, 10th, 11th
17 and 12th floor alight.

18 A. Yes.

19 Q. Would that have been a message passed by you?

20 A. It must have been, sir, yes.

21 Q. Does that look like an error?

22 A. It may have been an error on my part, sir, yes.

23 Q. Right. Now, the context of all this is that you now
24 have no recollection, independently, three and a half
25 years on, of what the numbers were that you were given,

1 which you recorded --

2 A. Yes.

3 Q. -- and indeed when you were provided with them.

4 A. Yes.

5 Q. But you're assisted by your statement, page 212 of your
6 statement, and in that -- it may be appropriate just to
7 pop it up again.

8 So the reason why we're looking at this in so much
9 dearly, apart from the fact that it is, of course,
10 important, is because of how this was recorded in your
11 statement.

12 A. Right.

13 Q. Let us look then down the third paragraph, midway down.
14 If we look at the left-hand end, the beginning of the
15 lines, do you see one that begins:

16 "... pumps at a time on behalf of WM Howling ..."

17 Just get to that line.

18 A. This means I was requesting two more pumps at a time on
19 behalf of WM Howling, yes.

20 Q. Right, and then the next sentence:

21 "As I was sending these messages ..."

22 So you're sending messages "make pumps six" and
23 "make pumps eight" --

24 A. That's correct, yes.

25 Q. -- at different times, obviously, and between the times

1 that you're sending those messages, you're receiving:

2 "As I was sending these messages, I was getting
3 messages [plural] from control telling me that there
4 were people in flat numbers."

5 And then we have the numbers listed there.

6 A. Yeah.

7 Q. Now, Mr Maxwell-Scott asked you earlier whether there
8 was anything which prompted you to quote those numbers.
9 He wasn't suggesting that there was anything wrong about
10 it or that in some way it was inappropriate, but of
11 course this statement is being taken in the course of
12 an investigation about the fire?

13 A. Yeah.

14 Q. Was there a policeman there taking the statement from
15 you?

16 A. We was interviewed by police officers, yes.

17 Q. Yes. And others?

18 A. Yes.

19 Q. So there you are, being asked to recall, albeit a few
20 days after the fire, what the flat numbers were. You
21 can't recall now how you recalled them, but there they
22 are written down there?

23 A. Yes.

24 Q. We, of course, know that the information that you
25 received in relation to flat numbers was received at

1 different times.

2 A. Yes.

3 Q. What you said this morning was that the information
4 which you recorded was received by you over a very short
5 space of time.

6 A. Yes.

7 Q. I'm going to ask you this, because here we are three and
8 a half years later: if you'd received some important
9 information about flat numbers, just thinking about it
10 now, would you have waited for ten minutes before you
11 strolled off to --

12 A. No.

13 Q. I shouldn't put it like that, but before you go to
14 Mr Howling and tell him?

15 A. No.

16 Q. No?

17 A. No.

18 Q. That's why I want to ask you again about exactly what
19 the mechanism was for informing Mr Howling what was
20 happening.

21 I'm now going to ask you about the messages of "make
22 pumps six" and "make pumps four". I'm sorry to make
23 Mr Maxwell-Scott go back to page 395 this time, if you
24 wouldn't mind, of the advocates' bundle and look at the
25 transcript again.

1 At the top of that page, the top left hand corner,
2 we see 16.36.44, and then we see the transcript section.
3 If we just come down to E351, you see --
4 A. Yeah.
5 Q. "FS Echo 351 from Watch Manager Howling. Make pumps
6 six. Over."
7 A. Yes.
8 Q. That was at 16.36.44?
9 A. Yes.
10 Q. I'm going to ask you about this: you're sending that
11 message from the Peckham pump --
12 A. That's correct.
13 Q. -- because it's the closest to Mr Howling. Insofar as
14 the messages were concerned which you had to write down
15 and give to Mr Howling about flat numbers, you actually
16 personally took those to him?
17 A. Yes.
18 Q. In relation to the messages to make pumps six and later
19 make pumps eight, I want to know what the mechanism for
20 your receiving that instruction from Mr Howling was, and
21 how long it took between you being told by Mr Howling to
22 make pumps six and radioing it and then having this
23 message logged with control.
24 A. Right.
25 Q. Just thinking about the "make pumps six" order from

1 Mr Howling, was that received by you over your personal
2 radio while you're standing by the Peckham pump? Were
3 you with Mr Howling? Do you recall now?

4 A. I can't remember. I can't remember whether I was in the
5 cab and he told me on the handheld radio, or whether
6 I was standing next to him at the time.

7 Q. So it's possible that you heard it on the radio. It's
8 possible that you were with Mr Howling and he told you
9 and you went to the pump?

10 A. Yes.

11 Q. If you wouldn't mind, then, turning to page 398. At the
12 top of the page, this is at 16.49.24, and there we see,
13 three entries down, 351:

14 "FS Echo 351 from Watch Manager Howling. Make pumps
15 eight. Over."

16 I imagine your reply to a request for the mechanism
17 of how you got that instruction and relayed it is the
18 same, is it, for "make pumps eight"?

19 A. Yes.

20 Q. The same as for "make pumps six", which is to say you
21 don't know whether you were told by radio or told in
22 person?

23 A. Yeah, that's correct. I don't remember.

24 Q. So we're not sure what the delay in time was from the
25 decision of Mr Howling to order you to inform control of

1 that information and actually when it was reported?

2 A. That's right.

3 Q. Obviously you can't recall now?

4 A. I can't, no, sorry.

5 Q. All right. I'm going to ask you about the aerial ladder
6 platform again.

7 A. Yeah.

8 Q. You've been asked a numbers of questions about that
9 which you've answered. You've been trained in the use
10 of ALPs, aerial ladder platforms?

11 A. That's correct.

12 Q. I think we heard some evidence from another witness the
13 other day but I'm going to ask you to confirm this.
14 They work at heights of 30 metres?

15 A. Just over 30 metres, yeah. 31 metres.

16 Q. 31 metres. Insofar as their use is concerned, if you
17 look at a building like this, are you going to be able
18 to reach, for example, for a rescue, the 11th floor of
19 a building like Lakanal with an aerial ladder platform?

20 A. Even, I think, if you had perfect circumstances, it
21 would have been borderline whether you were going to be
22 able to reach them. The reason I say that is because
23 the way ALPs work is that you have to get as close to
24 the building as possible. You have to get the jacks,
25 which are the stable part of the -- of the ALP -- they

1 stop -- they stop the vehicle tipping over, so you have
2 to get them as fully extended as far as they will go.
3 If you can't do that, you can restrict how far you go
4 out, how far you come in. If you do do that, then the
5 onboard computer will only let you do certain things.

6 Q. Right. Is it right that if you take three metres per
7 vertical floor as a standard when using ALP, if it's
8 just over 30 metres, that's only going to achieve the
9 8th floor? Is that right? Please tell me if that isn't
10 right.

11 A. Sorry, I'm trying to work it out in old money.

12 Q. Yes, please do.

13 A. It's about 103 total height, so if you work at 10 feet
14 per floor, then you're only going to get to the 10th
15 floor, probably, if you're very lucky.

16 Q. But in any event what you actually did was you sought to
17 use -- you used the monitor, did you, from the platform?

18 A. Used the monitor to start putting the fire out, yes.

19 Q. That's a 70-millimetre jet?

20 A. Yes.

21 Q. Just give the court an idea about the sort of power that
22 that will be sending water out from the jet at?

23 A. I don't know if you've ever seen on the television water
24 cannons used in Northern Ireland and other places to
25 knock people out the way. It would easily be able to do

1 that. It delivers 2,400 litres per minute.

2 Q. Yes. So what considerations are there that you're
3 trained to consider when you're seeking to address
4 a fire in a high rise residential building with the use
5 of a monitor of that kind from an ALP? What
6 considerations do you have to bear in mind?

7 A. Well, obviously that there are no people in the vicinity
8 where you're going to use it, because you could quite
9 easily kill them by knocking them over with the jet or
10 knocking debris onto them, because it could quite easily
11 knock a window in.

12 Q. Would you attack a fire with the use of a monitor from
13 an ALP if there might be residents or firefighters
14 inside the building?

15 A. No, only once you'd been told that they'd been
16 withdrawn, the crew's been withdrawn, there's no people
17 there. Then you can go ahead. So you have to get
18 clearance first.

19 Q. Yes. And of course what we have is smoke coming out of
20 the building here, as we know.

21 A. Yes.

22 Q. Is there any use of the jet which assists with smoke and
23 smoke-logging?

24 A. You can use what they call the Venturi principle, and
25 you can use that to disperse smoke but you normally use

1 that inside with a jet. You can turn it on so the water
2 comes out and draws the smoke out with it.

3 Q. All right. So you were trying to address the fire with
4 the use of the jet. What tactics did you deploy? Were
5 you using covering jets or were you actually trying to
6 attack a fire?

7 A. We was -- by that time, we was trying to put the fire
8 out with the jet.

9 Q. And the problems which you experienced were, in short,
10 what?

11 A. Heavily -- lots of smoke, very high winds, which
12 actually breaks the jet up. So obviously the further
13 away you are, the further reach you have to have with
14 the jet, and obviously the wind, if it's strong, will be
15 able to break up that jet so you get less water on the
16 job.

17 Q. Right. But of course one benefit other than the use of
18 the jet was you were able to speak to the people who had
19 come out onto the balcony. You told us about that.

20 A. Yeah.

21 Q. You actually didn't see them being rescued by
22 firefighters?

23 A. No, we didn't, but he was told through the radio letter
24 that they were recognised.

25 Q. Thank you very much, Mr Mullins.

Questions by the Jury

1

2 THE FOREMAN OF THE JURY: Thank you. We just have
3 a two-part question. I'm just wondering, Firefighter
4 Mullins, when you were operating the ALP and talking to
5 the family on the balcony, did you ask their flat or
6 floor number? I guess that's the first thing. If so,
7 was that relayed back to the incident commander?

8 A. No, I think what we did was we -- the main concern we
9 had was that they didn't jump, that they were assured
10 that there were crews definitely coming up to pick -- to
11 get them, and that they weren't -- they wouldn't be
12 forgotten about.

13 THE FOREMAN OF THE JURY: Okay, that ties in with the second
14 part of that question. Without knowing which flat the
15 family belonged to, how were you able to know that
16 somebody was actually on the way?

17 A. Because once we'd spotted them at the window, everyone
18 spotted them anyway. We then made sure that there were
19 crews on the way up -- we was told that crews were up
20 their way up to get them.

21 THE FOREMAN OF THE JURY: You were able to use your personal
22 radio to --

23 A. Yeah, because as well as our handheld radios, there's
24 an internal communication system within the ALP. So
25 I was able to talk to another operator who sits in the

1 chair below, basically as a safety officer, and he was
2 talking to people on his radio and he was able to relay
3 messages up to us and let us know that there were crews
4 on their way up to rescue them.

5 THE FOREMAN OF THE JURY: Okay. Thank you very much.

6 A. Thank you.

7 Questions by the Coroner

8 THE CORONER: So, Mr Mullins, are you saying that you
9 radioed down to the operator in the chair below you
10 information about the family on the balcony?

11 A. Obviously he could see -- he could see the family
12 himself, but we were talking to him, making sure that
13 there was a crew going -- there were crews in the
14 building going to rescue them and he said yes.

15 THE CORONER: What is the name of the operator in the chair?

16 A. It's Firefighter Taylor.

17 THE CORONER: That was Firefighter Taylor. And what did he
18 tell you about crews going to rescue the people on the
19 balcony?

20 A. That they were on their way and just to try and calm
21 them down as best we could and to reassure them that
22 there were crews coming to get them.

23 THE CORONER: And that's something that you recall?

24 A. Yes.

25 THE CORONER: Did you hear any of the radio traffic between

1 Firefighter Taylor and whoever it was that he was
2 talking to?

3 A. No.

4 THE CORONER: You couldn't hear that?

5 A. No, I don't remember hearing it, no, sorry, madam.

6 THE CORONER: So you only knew what Firefighter Taylor was
7 telling you?

8 A. That's correct.

9 THE CORONER: All right. Thank you very much, Mr Mullins.
10 Thank you for coming and thank you for the evidence you
11 have given. You're welcome to stay if you would like
12 but you're free to go if you would prefer.

13 A. Thank you madam.

14 THE CORONER: Yes. Mr Payton?

15 MR MAXWELL-SCOTT: Yes, that's right. He's scheduled to be
16 the next witness.

17 THE CORONER: Yes.

18 MR MAXWELL-SCOTT: Just before he comes to the witness box,
19 this might be an opportunity to give to the members of
20 the jury the updated sequence of events.

21 THE CORONER: Yes, that would be very helpful. Thank you.
22 This is to go behind tab 12?

23 MR MAXWELL-SCOTT: Yes, exactly so. What this is is
24 an updated version to take into account some of the
25 evidence that we've now heard in court over the last two

1 weeks. The updates are marked in yellow. This version
2 doesn't have the photographs that go with the icons, but
3 when we provide the next update we'll put the
4 photographs back in. So for the moment I suggest that
5 you keep the original one and file this behind the same
6 tab, which is tab 12. (Handed)

7 THE CORONER: Thank you. Members of the jury, we've had
8 a short break this afternoon. We're going to start the
9 evidence of Mr Payton now. Would it be convenient for
10 everybody if we went on until closer to 4 o'clock, or is
11 that going to give anybody any difficulties? Do say if
12 that's a problem.

13 THE FOREMAN OF THE JURY: No, I think that's okay.

14 THE CORONER: That's very kind. Thank you very much.

15 Mr Payton, would you like to come forward, please.

16 MR MAXWELL-SCOTT: Madam, his statement starts at page 216
17 in the statements bundle.

18 THE CORONER: Thank you.

19 CHRISTOPHER PAYTON (sworn)

20 THE CORONER: Thank you, Mr Payton. Do sit down. Do help
21 yourself to a glass of water. As I'm sure you've heard
22 me say to others, we need you, please, to speak as close
23 as you can to the microphone so that we can hear what
24 has been said. It may feel artificial, but if you could
25 direct your answers across the room towards the jury,

1 that would help them to hear what you have to say and to
2 keep you close to the microphone.

3 A. Yes, madam.

4 THE CORONER: Mr Maxwell-Scott, who is standing, is going to
5 ask you some questions initially on my behalf and then
6 there will be some questions from others.

7 A. Okay.

8 THE CORONER: Thank you.

9 Questions by MR MAXWELL-SCOTT

10 MR MAXWELL-SCOTT: Good afternoon. Can you give the court
11 your full name, please.

12 A. Yeah, it's Christopher Alan Payton.

13 Q. Is it right that in July 2009 you were a watch manager
14 based at Southwark fire station?

15 A. Yes, that's correct.

16 Q. At that time, how long had you been a watch manager for?

17 A. At that time, just over a year.

18 Q. Are you still employed by the London Fire Brigade?

19 A. Yes, I am.

20 Q. How long have you been a firefighter for?

21 A. Now, 24 years.

22 Q. Before I ask you to give your evidence about what
23 happened on 3 July 2009, I'm just going to identify with
24 you previous occasions on which a written record has
25 been made of your recollection of events. Firstly, in

1 the advocates' bundle at page 205, file 1. (Handed) If
2 you have page 205 in front of you, we can see it has
3 an exhibit reference CAP/1. Your name is given on the
4 top line, and it says 5 July 2009, 19.15 hours. Do you
5 see that?

6 A. Yes, that's correct. I've got that.

7 Q. Is that in your handwriting or somebody else's?

8 A. That's in someone else's handwriting.

9 Q. That document continues for 15 pages to page 219.

10 A. Yes, that's correct.

11 Q. If we look at the bottom of the page, do you see
12 underlined it says "completed at" and then it says
13 "00.10 hours, 6 July 2009"?

14 A. Yeah, that's correct. The statement was taken by
15 a senior officer when we were on night duty. So
16 obviously at that time on the old shift pattern we
17 started work at 1800 hours. The interview started at
18 7.15 that evening and I was still giving my evidence, or
19 writing down my recollection of what happened that day
20 at -- well, as it states there, we finished at 12.10 am.

21 Q. Now, you say it's not in your handwriting. Did you read
22 through it as you were going along?

23 A. Yeah. As you can appreciate by the length of it, the
24 officer that was writing it needed to take a few breaks
25 because his hand was obviously suffering, but yeah, no,

1 he would -- we would approach parts of it and then he
2 would write it down and then obviously he would stop and
3 maybe read it back to me and -- it wasn't in one, you
4 know, long written session as such, although it took
5 that long. There were breaks, you know, throughout it
6 as such.

7 Q. Did you then read through it at the end to satisfy
8 yourself that it was accurate?

9 A. Yeah, I believe it was read back to me, again, at a pace
10 where we could take it step by step, but yeah, it was
11 read back to me.

12 Q. And you were content with it?

13 A. Yeah, at that time yes I was.

14 Q. As you've explained to the jury, it wasn't as if you
15 were suddenly presented with 15 pages of it just after
16 midnight which you hadn't seen at all; you had looked at
17 it from time to time as it was being written?

18 A. Yeah, that's true. I mean, the -- I think the
19 "completed at" time is obviously the time that he
20 completed writing that up. If memory serves correct, it
21 was probably getting on for nearer -- possibly 12.30,
22 12.45 in the morning that we had the opportunity to go
23 through the statement and look at it again.

24 Q. Did you have access to anything when those notes were
25 written up?

1 A. No, I didn't, no.

2 Q. Purely from memory?

3 A. Yes, it was.

4 Q. But as we've seen, a little over 48 hours after the fire
5 itself?

6 A. Yes, it was. I think the only other thing to put into
7 context when this statement was taken was that for
8 certainly the local crews the -- the fire at Lakanal had
9 occurred on a Friday. On the Saturday, my station and
10 two appliances from Old Kent Road and an appliance from
11 Dockhead fire station, we attended another fire on Old
12 Kent Road's that required four machines, so we'd
13 obviously had quite a long day Friday and then Saturday
14 we were busy for a number of hours that afternoon
15 attending another fire. So certainly for all the local
16 stations that weekend, it was quite a busy weekend
17 anyway.

18 So yeah, this statement would have been on our first
19 night duty having completed two day duties previously to
20 that.

21 Q. Then you made a formal witness statement in the style
22 that we've seen many other witnesses did, and that's
23 dated 11 July 2009. I'll just show you that very
24 quickly on the screen at 216 of the statements bundle.

25 A. Yeah, I've got that.

1 Q. When you made that statement, did you have those
2 15 pages of handwritten notes with you?

3 A. No, I didn't.

4 Q. This was from memory but without the benefit of these
5 handwritten notes?

6 A. After this original statement was taken, I never saw
7 a copy of it again, certainly not until within the last
8 week or so. The statement that's on the screen was
9 taken, and again I wasn't presented with a copy of it
10 until quite recently.

11 Q. Then you prepared a second witness statement
12 in March 2010, which is page 220 in the statements
13 bundle.

14 A. I've got that on the screen, yeah.

15 Q. You have that on the screen?

16 A. Yeah.

17 Q. And that had the format of questions and answers given
18 by you being recorded?

19 A. Yeah, as you can see, that was a statement that was
20 taken, if memory serves correct, at brigade
21 headquarters. Present then was obviously, as listed
22 there, a detective from the Metropolitan Police,
23 a number of senior brigade officers and a Fire Brigade
24 union representative.

25 Q. When you made that statement, were you provided with

1 either your handwritten notes from 5 July or your first
2 witness statement of 11 July, or both of them?

3 A. I don't recall that being the case, no, again. I don't
4 recall -- in fact, if memory serves correct, with this
5 third one, I think there was some -- some maps that I'd
6 withdrawn originally were represented for further
7 comment, because by then I think there were pictures
8 available for the third statement. But the actual
9 written part of my first statement and my second
10 statement I hadn't had sight of prior to this.

11 Q. Let me just show you some maps to see if that's what
12 you're referring to. This is the advocates' bundle at
13 220. I'll just go through them fairly quickly on screen
14 to see if it refreshes your memory.

15 A. Yeah, that one there's in my handwriting, and so's that
16 one. And that one as well, that's my handwriting. And
17 again, yeah.

18 Q. So those are in your handwriting, although the notes
19 themselves are not?

20 A. That's correct, yeah.

21 Q. Just looking in fact at page 226, this says:

22 "I exhibit this statement as CAP/1."

23 Dated 11 July 2009. So that's the date of your
24 first witness statement, and suggests that you were
25 exhibiting all of the first notes to your first witness

1 statement.

2 A. Yeah, that would be how it appears to me as well, yeah.

3 Q. We may come back to the content of some of those later.

4 Turning now to your involvement on 3 July 2009, you
5 said you were based at Southwark fire station and you
6 were a watch manager. You're the first watch manager to
7 give evidence here, so can you briefly explain to the
8 jury what the role of a watch manager is?

9 A. The command structure in a fire station is that there's
10 four watches: red, white, blue and green. Each watch is
11 made up, certainly at my station -- it's a one-appliance
12 station, so there'll be one watch manager, which is
13 myself, a crew manager, who's my deputy, and then five
14 firefighters. My role is to manage the watch, both on
15 the station and obviously if we attend incidents. Up to
16 a certain size of incident, I am responsible and will
17 manage that incident as well.

18 Q. Our records indicate that you arrived on E331 at
19 approximately 16.45?

20 A. If the log says that's the time we arrived, then I would
21 expect that to be quite accurate, yes.

22 Q. Do you recall what your initial impressions were on
23 arrival at the building?

24 A. We had already had some indication of the sort of
25 incident that we were attending because obviously the

1 route that we took to get to Lakanal House. My driver
2 on that day was quite familiar with the area. The route
3 that we took afforded us a view of that area, not the
4 block specifically, but we could see quite a lot of
5 smoke from the area that we knew we was headed to.
6 I don't recall that we overheard any radio traffic
7 en route, and certainly when we pulled up we could see
8 that there was a -- a well-developed fire on the upper
9 floor of the block that obviously we'd come to know was
10 Lakanal.

11 Q. Just pausing there, had you been to this block before?

12 A. I think I was asked that in one of my earlier
13 statements. Previously to being posted to Southwark
14 fire station, I was based at Old Kent Road fire station
15 for 19 years. I used to ride the turntable ladder
16 amongst the other appliances that were there, and if
17 memory serves correct, I may well have attended
18 incidents at either Lakanal or its sister block in my
19 time that I was at Old Kent Road prior to going to
20 Southwark.

21 Q. Do you think that you'd ever been into a flat before?

22 A. No, if I'd been there, I would only have sat inside the
23 appliance. I wouldn't have gone inside the building.

24 Q. Do you recall who was the incident commander at the time
25 you arrived?

1 A. When -- looking at the call slip -- it indicates on the
2 call slip who's been designated as the watch manager for
3 any incident that we go to if it's involving more than
4 two appliances. Obviously the call slip that we
5 received at the station not only informed us that we
6 were going to a six pump fire, but I looked at the
7 appliances that were already attending and had kind of
8 surmised that it would be the watch manager from
9 Old Kent Road, because I think for whatever reason I'd
10 already discovered that the watch manager from Peckham
11 was on leave that week.

12 When we arrived at the vicinity of Lakanal,
13 I instructed my driver to park up some distance away
14 from the building, because obviously we're always
15 mindful of the fact that we may need to get ambulances
16 or other aerial appliances, that sort of thing, into the
17 local area.

18 When we got off the appliance, I got in touch by
19 handheld radio. I'd spoken to one of the firefighters
20 from Old Kent Road as we got off the appliance and
21 asked, just to confirm who was in charge.

22 Q. Who were you total was in charge?

23 A. I was informed that it was Watch Manager Howling. So on
24 the basis of that information I contacted him via
25 handheld radio, explained to him that obviously we were

1 in attendance, and asked him what resources did he
2 require from us at that point.

3 Q. What did he say?

4 A. John came back on the radio and said that obviously he
5 had quite a developed flat fire on an upper floor and he
6 asked that -- certainly from our crew's point of view
7 that we could provide two firefighters in breathing
8 apparatus.

9 Q. So what did you do?

10 A. I instructed two of my crew, Firefighter Smith and
11 Firefighter Gray, if memory serves correct, to don their
12 breathing apparatus, and obviously they were going to be
13 the BA crew that we provided.

14 Q. What did you do after that?

15 A. Well, we have to -- at any larger incident, every fire
16 appliance carries what is called a nominal role board.
17 On the nominal role board will be a list of everyone
18 that is riding that appliance that day. It will list
19 their rank and then a list of the firefighters below
20 that. At all large incidents we have to hand that board
21 in. It's a means of -- should there become a need to
22 evacuate a premises or if firefighters become injured or
23 unaccounted for, they obviously have a tally of every
24 firefighter that's at that incident, so it's important
25 that we hand that in when we arrived.

1 I could see the command unit had turned up, but
2 I was informed that they were still in the process of
3 setting up, which happens with the command unit. They
4 need to get radio masts up, computers fired up,
5 et cetera.

6 THE CORONER: Mr Payton, don't rush on too fast, because
7 Mr Maxwell-Scott's trying to take it through step by
8 step.

9 A. Okay.

10 THE CORONER: Thank you.

11 MR MAXWELL-SCOTT: What did you do with the nominal role
12 board?

13 A. I gave it to one of the firefighters from Old Kent Road
14 and asked that he give it to the command unit.

15 Q. Where did you then go?

16 A. All of my crew, we then proceeded down Dalwood Street.
17 We parked up on or around the corner of Havil Street and
18 Dalwood Street.

19 Q. Let me show you an aerial photo that may help.
20 Lakanal House is in the middle of the picture. I'm
21 marking it with the white arrow now. You can see
22 Dalwood Street marked.

23 A. Yeah, I think if you carry on -- yeah, so --

24 Q. Havil Street is there.

25 A. There's a red vehicle just at the top. Yeah, we

1 initially parked there, or thereabouts.

2 Q. Where did you go from there?

3 A. All -- all of my crew, we then got off and then walked
4 into Dalwood Street and made our way to Lakanal.

5 Q. Did you go down this access road that I'm marking on the
6 west side of the building?

7 A. Yeah, sort of prior to getting to that point, I think
8 there's railings on the right-hand side. We could
9 obviously see that there were a lot of people already in
10 the street. We could already see fire engines that were
11 already parked up. I believe John Howling may have
12 already said to me that that was where he was, but to be
13 quite honest it was quite easy to find John, because he
14 was the only other watch manager in attendance at that
15 time so he would have been the only other officer with
16 a white fire helmet.

17 Q. Did you go and find him?

18 A. Yeah, it was easy to find him, yeah.

19 Q. If we look at your note that you made two days after the
20 fire on page 206.

21 THE CORONER: Sorry, which page number are you on?

22 MR MAXWELL-SCOTT: 206.

23 THE CORONER: Thank you.

24 MR MAXWELL-SCOTT: It says there:
25 "On walking down Dalwood Street, I could see a large

1 developed fire at what I believe and now know was the
2 9th floor of Lakanal. I reported to
3 Watch Manager Howling, who was positioned stood on
4 a green facing Lakanal (plan 2)."

5 Plan 2 is at page 221.

6 In the bottom right-hand corner where my arrow is,
7 that's Lakanal House, this is the access road, and
8 you've marked where my white arrow is.

9 A. Yes, that would be correct.

10 Q. And you've written -- side on you've written
11 "WM Howling".

12 A. Yeah.

13 Q. Did you then speak to him face-to-face?

14 A. Yes, I did.

15 Q. Can you remember how many other people were present,
16 approximately?

17 A. I wouldn't be able to put an exact figure on it, but
18 there were a lot of people trying to either get John's
19 attention or waiting to speak with him. That would have
20 been a mixture of firefighters and, if memory serves
21 correct, members of the public as well.

22 Q. Do you remember if there was anybody there from
23 a command unit at that time?

24 A. Not that I recall, no.

25 Q. If there had been, they would have been watch manager

1 rank; is that right?

2 A. Yes, that's correct. They would also wear a tabard that
3 is chevroned with white and red squares, usually has
4 "command support", so you could easily identify them as
5 someone from the command unit.

6 Q. Given what you have just said, do you think there
7 probably wasn't anybody there from a command unit at
8 that time, or can you not say?

9 A. I don't think there was.

10 Q. Can you remember how long you were with
11 Watch Manager Howling for before you went off to carry
12 out your next activity?

13 A. I wouldn't be able to put an actual time on it.
14 I remember John gave me a very detailed brief of what he
15 had and what was in front of him, the decisions that
16 he'd made prior to our arrival. He was very clear about
17 the fact that he wanted me to go and oversee around the
18 bridgehead for him. Obviously he made it quite clear as
19 well what our line of communication would be, what I was
20 to get in touch with him for, so extra resources, that
21 sort of thing. He also then asked Firefighter Mullins
22 to provide me with a list of flat numbers that they had
23 been provided with prior to our arrival, and obviously
24 the intimation was that these flats were ones that had
25 been in contact with control.

1 Q. Did Firefighter Mullins give you a list?

2 A. Yes, he did.

3 Q. Did he say anything to you about the list, or did he

4 just give it to you?

5 A. If memory serves correct, I believe Mark explained to me

6 that these were numbers that he'd received through

7 messages or radio traffic with our control staff.

8 Q. Did you look at the list when he gave it to you?

9 A. Very briefly.

10 Q. Were you in court when he was giving his evidence

11 earlier?

12 A. Yes, I was.

13 Q. You will recall that in answer to a question from me

14 about whether the list was given, as it were, folded, so

15 that one couldn't see what it said, or unfolded, so that

16 one could see what it said, he said that it was given

17 unfolded and that you looked at it?

18 A. Yes, that would be correct.

19 Q. Do you recall what was written on the list?

20 A. I can only recall that there were numbers written on

21 there, but I wouldn't be able to sit here and say what

22 numbers they were from memory, no.

23 Q. Do you recall that he told the court today that the list

24 had written at the top of it "people trapped" and then

25 had some numbers written underneath?

1 A. I don't recall that there was a heading as such. I do
2 recall that there were numbers on there but I don't
3 recall the heading, no.

4 Q. Do you remember if there was anything on the list other
5 than numbers?

6 A. No, I just recall that there were numbers on there.

7 Q. Do you remember how many different numbers were on the
8 list?

9 A. To say so would be approximating. I couldn't give you
10 an exact figure, no.

11 Q. Do you remember if any of the numbers was marked or
12 identified in some way as to draw particular attention
13 to it, so either by a text or by it being circled or
14 something of that nature?

15 A. No, I've no recollection of that.

16 Q. What did you do with the list?

17 A. I believe I put the list in my pocket.

18 Q. Would you have folded it up to do so?

19 A. I would imagine so, yes.

20 Q. Did you make any attempt to memorise what was on the
21 list before you put it in your pocket?

22 A. No.

23 Q. Did you ask either Firefighter Mullins or
24 Watch Manager Howling any questions about the flat
25 numbers on the list?

1 A. No, I didn't. I mean John, in his handover, had
2 obviously indicated that he had a list of flat numbers
3 that had been provided by our control room. It was
4 quite obvious the purpose of why John was giving me that
5 list. They were obviously flats that he would expect me
6 to make sure that BA crews were sent to as and when we
7 had the resources to do that, so to be quite honest,
8 it -- in John giving me that list, it was quite obvious
9 what he would expect me to do.

10 Q. We have up on the screen a representation of what the
11 west side of Lakanal looks like from ground level.

12 A. Yes, I've got that.

13 Q. It didn't look exactly like that because of the fire,
14 which we'll come to, but when you look at it like that,
15 one doesn't know what flat is what, one doesn't know
16 where the numbers are, does one?

17 A. No, that would be correct.

18 Q. Was there any discussion about trying to see if anybody
19 knew where the flat numbers on the list were within the
20 building?

21 A. That was not a conversation that took part. I think it
22 would be fair to say it was very busy at that time.
23 There was a lot going on. The crews that were already
24 there were obviously very stretched, they was working
25 very hard. It was evident that John had a lot going on

1 as well with different people wanting to speak to him,
2 different decisions that he had to make. John had
3 informed me that it was believed that the flat was on
4 the 9th floor and that the bridgehead was being set up
5 on the 7th.

6 Q. Just pausing there, when you say "the flat" ...?

7 A. It was apparent that there was a flat alight. That was
8 for everyone to see, particularly as we, as a crew,
9 arrived. John's indication was that he believed it was
10 on the 9th floor and that a bridgehead had already been
11 set up on the 7th floor.

12 Q. Just pausing there, your appliance, we believe, arrived
13 at 16.45.45. You told us where it was parked and so we
14 can see for ourselves the distance from where it was
15 parked to where Mr Howling was standing. The photo I'm
16 now going to show you is at 16.46.11, which I would
17 suggest is likely to have been taken before you reached
18 Watch Manager Howling. If I show you one a minute
19 later, 16.47.35. That is not a picture of just a single
20 flat on fire, is it?

21 A. To be quite honest, that's not a view of the block that
22 I would have had, that close-up. I mean, if you can
23 imagine, we're walking some 30 metres away and
24 approaching the flat. As I recall, it certainly
25 appeared on arrival that there was initially a flat very

1 well alight.

2 Q. If I just move you on to 16.48. This is taken from
3 further away.

4 A. Yeah, that would be a fairer assessment of certainly the
5 first time that we saw the block, as we were walking
6 down to meet Watch Manager Howling.

7 Q. How many flats would you have thought were on fire,
8 looking from that position at that time?

9 A. Well, looking at it now would be different to how
10 I looked at it then. My focus at the time was to get to
11 Watch Manager Howling and obviously carry out what he
12 wanted me to do. It was evident, as we arrived, that
13 there was a fire in the flat. I hadn't paid a great
14 deal of attention to specifics of floors. Our main aim
15 was to get to -- you know, to John, and then obviously
16 to carry out what he needed to do.

17 THE CORONER: Mr Payton, when you turned up, you believed
18 that you were going to a fire in one flat?

19 A. Yes, madam.

20 THE CORONER: Sorry, could we just have the photograph back,
21 please. That was a photograph, you said, of the sort of
22 view you had when approaching the building?

23 A. Yes, madam.

24 THE CORONER: That doesn't look like a one-flat fire, does
25 it?

1 A. No, I would quite happily --

2 THE CORONER: Didn't that surprise you? Didn't you think to
3 yourself: "Gosh, I thought I was going to a fire in one
4 flat. That looks rather different"?

5 A. As I sit here now, my answer would probably be
6 different, quite obviously. As what I recall on the
7 day, I just recall looking up and seeing what I believed
8 to be a very well developed flat fire. The time it took
9 for to us work from the corner of Havel Street to where
10 Watch Manager Howling was was probably no more than
11 a minute and by then I was already focussed on finding
12 Watch Manager Howling rather than looking up to see how
13 the fire had progressed. To my mind, the view that I'd
14 already had was that I believed that we was dealing with
15 a fire in a flat that was 100 per cent alight. I hadn't
16 really given any further thought to whether it was over
17 one or two floors.

18 THE CORONER: I see.

19 Could you find a convenient stopping point,
20 Mr Maxwell-Scott.

21 MR MAXWELL-SCOTT: Yes, perhaps just two more questions.

22 Do you recall being part of any discussion about
23 whether there was any correlation between the flat
24 numbers on the list that you were given and areas in the
25 building where you could see fire?

1 A. No.

2 Q. Doing the best you can, do you think that is because
3 there was no such discussion?

4 A. I would imagine it's because I found
5 Watch Manager Howling, took the brief from him. I think
6 it goes without saying both of us would probably be
7 thinking the same thing, that time is of the essence.
8 John has briefed me, John has told me what he wants from
9 me. I'm well aware that there are persons more than
10 likely involved by the nature of the fact that we have
11 a list of flat numbers. Once John has given me a full
12 brief, then I'm going. You know, I'm going into the
13 building because that's what he wanted me -- and
14 obviously, to me, the quicker I get in, the quicker we
15 can carry on with what's being done.

16 Q. Was it in any way part of your thought processes at the
17 time how easy or difficult it would be to find where
18 those flats were within the building?

19 A. Not at that time, no.

20 Q. Madam, I think that's a convenient moment.

21 THE CORONER: Thank you very much.

22 Mr Payton, we'll have a break there. Please can you
23 come back tomorrow to start at 10?

24 A. Yes, madam.

25 THE CORONER: And remember what I've said -- well, maybe

1 I haven't said it to you. The strict rule is that
2 because you're part way through giving your evidence you
3 must not talk to anyone about your evidence or about the
4 case. So before you meet up with colleagues and go
5 home, just give some thought to how you're going to
6 answer questions about what you've been doing today,
7 because you must not talk about it. 10 o'clock
8 tomorrow, please.

9 Members of the jury, 10 o'clock tomorrow, please,
10 and remember the warnings I gave to you about not
11 talking to anyone about the case and not doing your own
12 research. Would you like to go with Mr Graham.

13 (In the absence of the Jury)

14 THE CORONER: Yes, would it be helpful just to have a very
15 quick look at tomorrow, Mr Maxwell-Scott?

16 MR MAXWELL-SCOTT: Yes, it would, madam.

17 THE CORONER: I am a sorry, Mr Payton. You're free to go
18 now.

19 MR MAXWELL-SCOTT: He will conclude his evidence tomorrow
20 morning.

21 THE CORONER: Yes.

22 MR MAXWELL-SCOTT: I very much doubt that we would be able
23 to complete all the other witnesses currently scheduled
24 for tomorrow. I think the best course of action may be
25 for me to have discussion firstly with Mr Walsh about

1 availability of his witnesses. What I'm thinking is
2 that it would be desirable to have Watch Manager Cook.

3 THE CORONER: Yes.

4 MR MAXWELL-SCOTT: But that, depending on his views and the
5 views of others, Watch Manager Paffett could be put to
6 another day because he comes a little later in the
7 chronology. Once I've had that discussion with him,
8 I'll be able to form a view as on to whether to keep the
9 residents on the list or not.

10 THE CORONER: All right. Well Mr Walsh, I appreciate it's
11 difficult when people have to change their shifts and so
12 on, but thank you for your help in trying to organise
13 witnesses in this way.

14 MR WALSH: We'll make every arrangement we possibly can.

15 THE CORONER: I am sure you will. Thank you very much. Are
16 there any points anyone would like to raise before we
17 finish this evening? Thank you very much.

18 (4.06 pm)

19 (The Court adjourned until 10 o'clock the following day)

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25	Questions by the Jury	21
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