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Friday, 1 February 2013

(9.57 am)

THE CORONER: Good morning, do sit down. Could we ask the jury to come in, please.

(In the presence of the Jury)

THE CORONER: Good morning, everybody. Yes, Mr Maxwell-Scott.

MR MAXWELL-SCOTT: Good morning, madam. The next witness is Watch Manager Howling.

THE CORONER: Yes, thank you. Mr Howling, are you in court? Would you like to come forward, please? Thank you.

JOHN HOWLING (sworn)

THE CORONER: Thank you, Mr Howling, do sit down. Do help yourself to a glass of water.

A. Thank you.

THE CORONER: The microphone in front of you is switched on, but you need to be quite close to it for your voice to be picked up and so we do need to hear what you have to say, so please if you could make sure you keep your voice up and speak as closely to the microphone as you can. You might find that if you direct your answers across the room to the jurors then they will hear better and it will help you to keep close to the microphone. Mr Maxwell-Scott who is standing is going to be asking you questions initially on my behalf and then there will

1 be questions from others, all right --

2 A. Thank you madam.

3 THE CORONER: -- and we will have a break at about mid

4 morning.

5 A. Thank you.

6 THE CORONER: Yes.

7 Questions by MR MAXWELL-SCOTT

8 MR MAXWELL-SCOTT: Good morning, Mr Howling.

9 A. Morning, sir.

10 Q. Can you give the court your full name, please?

11 A. My name is John Howling.

12 Q. Are you still employed by the London Fire Brigade as

13 a watch manager?

14 A. Yes, I am.

15 Q. How long have you been employed by the London

16 Fire Brigade for?

17 A. 27 years.

18 THE CORONER: Sorry, I missed that.

19 A. 27 years.

20 MR MAXWELL-SCOTT: Can you remember in what year you were

21 promoted to watch manager?

22 A. It was 1999.

23 Q. At the time of the fire at Lakanal House in July 2009,

24 is it right that you were a watch manager based at the

25 Old Kent Road fire station?

1 A. That's correct.

2 Q. In what year had you taken up that post?

3 A. I went there in the middle of May of that year, so I'd

4 only about there for five or six weeks.

5 Q. Had you been to Lakanal House before 3 July 2009?

6 A. No.

7 Q. Mr Howling, if I ask you today about policies and

8 practices, unless I indicate otherwise, my questions

9 will be directed to how things were done on or before

10 the date of the fire, and unless I indicate otherwise,

11 my questions will relate to events on 3 July, between

12 1621 hours, when you were mobilised, and the time when

13 Station Manager Cartwright took over from you as

14 incident commander and you finished briefing him, is

15 that clear?

16 A. Yes.

17 Q. Is it right that back in July 2009 the Old Kent Road

18 fire station had a total of three appliances?

19 A. That's correct, yes.

20 Q. What were they?

21 A. Pump -- pump ladder, a pump and an aerial ladder

22 platform.

23 Q. You have been asked to give an account of the events of

24 3 July 2009 on several previous occasions. I think it

25 would be helpful for you and for the members of the jury

1 if I just identify those with you now in chronological
2 order.

3 Firstly, a handwritten note, a one page note that
4 I'm going to show you. It's on the screen now.

5 A. Yes.

6 Q. Do you recognise that document?

7 A. I do.

8 Q. Is it in your handwriting?

9 A. It is.

10 Q. Was that created by you on 5 July 2009?

11 A. Yes sir, it was.

12 Q. Did you do that because somebody asked you to or because
13 you decided to do it of your own initiative?

14 A. It was the first opportunity I had. I believe it was
15 the Sunday morning. I was phoned by my borough
16 commander at the time to tell me that I was gonna be
17 interviewed that evening by some senior officers about
18 the events, it couldn't have been done the previous day,
19 we were on -- on a day duty, and we were -- we were very
20 busy in terms of fire calls on that day as well, so it
21 was the first opportunity I really had to get my
22 thoughts about the incident down on paper.

23 I -- I just sat down and done what I believe is
24 called a mind map and tried to just basically put down
25 everything I could remember about what was a very

1 dynamic and unexpected incident in terms of how it
2 occurred.

3 Q. So is that something you did on your own?

4 A. Yes.

5 Q. Can you confirm that it is an attempt to set out events
6 throughout the day, rather than just the period when you
7 were incident commander?

8 A. Yeah, that's correct. It was trying to -- I was just
9 trying to pick out the main points that I can remember,
10 because it was all a bit of a -- you know, a bit of
11 a mess, you know, in terms of what I could remember,
12 a bit of a blur, if you like.

13 Q. Let me then take to you a four-page set of typed notes.
14 This is at page 187, over the page in the advocates'
15 bundles. It says in the third line:

16 "Date of notes: Monday 13 July 2009."

17 A. Yes.

18 Q. Do you recognise that document?

19 A. Yes, it's something I put together, based on what I'd --
20 my previous sheet.

21 Q. So is this a document -- it may assist you to be shown
22 the hard copy, I think, in file 1 of the advocates'
23 bundles. (Handed)

24 Just showing on you the screen, that's page 2,
25 page 3 and page 4, so it's four pages of typed notes.

1 A. Yes.

2 Q. Did you prepare that yourself?

3 A. Yes, I did it at home.

4 Q. On your own?

5 A. Yes.

6 Q. You mentioned a few moments ago that you prepared the
7 first single page document, the mind map as you called
8 it, because you were going to be interviewed later that
9 day by some senior officers?

10 A. That wasn't -- that wasn't the only reason I did it,
11 I knew i needed to get what I remembered down just for
12 my own recollection, because I knew that there would be
13 obviously a performance review of command and
14 a performance review of ops, and it was the events of
15 the day -- it was a long day and a very demanding day,
16 and it was the first opportunity I had to write anything
17 down about it.

18 Q. Just pausing there, what I wanted to ask you is were
19 you, in fact, interviewed by officers on 5 July?

20 A. Yes, in the evening.

21 Q. Do you remember who interviewed you?

22 A. I don't know the station manager's name, no.

23 Q. Was it someone who had been involved in the incident?

24 A. I don't believe he was there, no.

25 Q. Going back to your note, that's four pages prepared by

1 you on your own on 13 July, and then on page 191 that's
2 a diagram of the bridgehead when it was on the
3 3rd floor, is that right?

4 A. Yes.

5 Q. Was that drawn by you?

6 A. Yes.

7 Q. Then following the chronology through, a PRC was held on
8 14 July 2009; do you remember that?

9 A. I remember it, yes.

10 Q. Can you just explain to the members of the jury what
11 a PRC is?

12 A. A performance review of command is an opportunity for
13 the Fire Brigade to look at the command and control
14 function at an incident. It's basically a debrief of
15 the incident commanders who attended the incident from
16 IC1, as we call it, the first incident commander, right
17 through to the most senior officer who attended, and is
18 chaired by an independent officer who was not at the
19 scene.

20 Q. I'll just ask you to identify the notes, and they start
21 at page 1324 in the advocates' bundles. I've put them
22 on the screen, the first page, but you'll be shown
23 a hard copy in a moment. (Handed)

24 Just looking on the first page, Mr Howling, we see
25 the list of people who attended, and you're down as

1 "IC2 John Howling", is that right?

2 A. Yes.

3 Q. These notes are not written by you, though, are they?

4 A. No.

5 Q. Were you shown the notes at the time?

6 A. No.

7 Q. So you didn't have an opportunity to confirm that they

8 were accurate, or to ask for any corrections to be made?

9 A. No, I would say that -- no, because I haven't seen them.

10 Q. Thank you. If I just ask you to look on into page 1328,

11 do you see in the right hand column there's some text

12 about two-thirds of the way down?

13 A. Yes.

14 Q. If you go to the left of that and then up a couple of

15 lines, do you see the reference to the phrase:

16 "Considered need to reassure people in flats with

17 fire survival calls."

18 A. Yes.

19 Q. Now, the phrase "fire survival calls," was that one that

20 you used at the time as part of your day to day language

21 and jargon?

22 A. No, no.

23 Q. Do you think it's a phrase that you would have used at

24 a meeting on 14 July 2009?

25 A. Possibly, yes, but simply because, having spoken to

1 other officers who attended in a more senior position
2 than me, they -- they mentioned that phrase, and prior
3 to then, it wasn't a -- a phrase I was familiar with.

4 Q. That perhaps illustrates the fact that these are notes
5 written by somebody else rather than by you?

6 A. Yes, possibly.

7 Q. You then prepared and gave a witness statement the next
8 day, 15 July 2009, and if you would take up the witness
9 statements bundle at page 276, Mr Clark will find it for
10 you. (Handed)

11 Do you have the first page of that?

12 A. Yes.

13 Q. Do you recognise that as your first witness statement?

14 A. Yes.

15 Q. If you turn on in it to the final page, which is 283?

16 A. Yes.

17 Q. I'm not going to go through the process of comparison
18 because it would take a long time, but you can take it
19 from me that up until the paragraph beginning, "During
20 my career," the text on the previous seven and a quarter
21 pages is essentially identical to your typed up notes
22 that we've previously seen.

23 A. Yes, that's a fair point, yes.

24 Q. I wanted to ask you how it was that the statement was
25 taken from you?

1 A. I went to be interviewed with the police and a senior
2 officer at brigade headquarters. I told the police
3 officers who were interviewing me that I had basically
4 already put down my thoughts, and that -- you know,
5 that's -- and they were in agree -- they were in
6 agreement to me using that as the basis of my statement.

7 Q. To what extent did they actually ask you any questions?

8 A. I don't recall the line -- the lines of questioning now,
9 it was a long time ago, but I -- I can't remember, you
10 know, the dynamics of the questions that I was being
11 asked. But there were two police officers there,
12 a Fire Brigade Union official and a prepared senior
13 officer, and we spent the whole day just, I think, going
14 over what I put on there and discussing it, rather than
15 them asking questions.

16 Q. Okay. Then you attended a PRO on 19 July 2009. I'll
17 show you the notes from that at page 1320 in the
18 advocates' bundles.

19 A. Yeah, excuse me, I didn't attend the PRO on the 19th.

20 Q. All right, I think some members of your crew did --

21 A. Yeah, quite possibly.

22 Q. -- but you didn't?

23 A. I wasn't there, no.

24 Q. All right, I won't ask you about that then. In 2010 you
25 gave a second witness statement, and I'll show you that,

1 starting at 284 in the witness statements bundle.

2 THE CORONER: Do you want to turn that up, Mr Howling, you
3 have it in front of you, I think, page 284.

4 A. Yes, I've got it.

5 MR MAXWELL-SCOTT: If you look on page 284 about three
6 quarters of the way down the page it says that:

7 "This statement was made over two dates, the first
8 being 30 March and the second being 13 May."

9 A. Yes.

10 Q. In the first paragraph on that page we can see that you
11 were provided with a copy of your first statement,
12 "other evidence provided, incident report, plans and
13 photographs" when the second statement was taken from
14 you.

15 A. Yes, that's correct.

16 Q. What I'd like to do now, Mr Howling, is, for the benefit
17 of the members of the jury, just to establish in outline
18 the period when you first were aware of the fire and the
19 end of the period when you ceased being incident
20 commander and handed over to Station Manager Cartwright,
21 and then later on we'll go back to those events in
22 rather more detail, okay?

23 A. Yes.

24 Q. The records that we have indicate that you were called
25 to attend Lakanal House at 1621 hours.

1 A. Yes.

2 Q. On that day how many firefighters were there on duty at
3 the Old Kent Road fire station?

4 A. In the afternoon, there were five on the pump ladder,
5 four on the pump, and two on the ALP.

6 Q. So 11 in total?

7 A. Yes.

8 Q. Did you know from the first moment you were mobilised
9 that you would be the incident commander when you
10 arrived?

11 A. When I looked at the call slip, yes.

12 Q. We'll come back to the call slip later, I just wanted to
13 ask you that at this stage. Then we know from the
14 records we have and our sequence of events that your
15 appliance arrived at Lakanal House at 16.26.

16 A. That would be about right, yes.

17 Q. When you got there you found Crew Manager Willett --

18 A. Yes.

19 Q. -- and had a conversation with him --

20 A. Yes.

21 Q. -- and then took over from him as incident commander.

22 A. Yes.

23 Q. The records that we have indicate that just before
24 1630 hours a message was sent to brigade control to say
25 that you were now the incident commander.

1 A. Yes, that would be right. What was the time, sorry?

2 Q. It's 16.29.56.

3 A. Yes, okay, thank you.

4 Q. Did you then remain as incident commander until you were
5 replaced by Station Manager Cartwright?

6 A. Yes.

7 Q. I'd just like to try to work out with you when that
8 changeover took place. If I could ask you firstly in
9 this way: do you remember how soon after
10 Station Manager Cartwright found you did he say to you
11 that he was taking over as incident commander?

12 A. I wouldn't be able to give an accurate time on that, it
13 was -- there was so much going on at the time he
14 arrived -- between the time he arrived and the time he
15 actually officially took over that I -- I wouldn't be
16 able to tell you.

17 Q. Can you help us with whether he arrived and said, "I'm
18 now taking over as incident commander, please give me
19 a briefing", or whether he arrived and said, "Please
20 give me a full briefing", and then at the end of this
21 sentence said, "I'm now taking over as incident
22 commander"?

23 A. Yeah, it would be the latter.

24 Q. If I ask you to take up the sequence of events which is
25 in the jury bundle at tab 12. (Handed)

1 I'm just going to show you what the sequence says in
2 terms of the time when the message was sent. 16.55.23,
3 page 6 of that version.

4 A. Yes, I see that.

5 Q. There may well be evidence from Mr Cartwright to the
6 effect that he asked the command unit to send the
7 message before he actually came and found you at the
8 fire ground at all; that's not something you would be
9 able to comment on one way or the other?

10 A. No, I don't know.

11 Q. The first witness statement you gave, if I could just
12 ask you to have a look at that on this point.

13 A. Starting page 272?

14 Q. It starts at page 276.

15 A. Beg pardon.

16 Q. If you look at page 280, the first main paragraph says
17 in the first line that you made pumps eight at 16.49 and
18 continued briefing Station Manager Cartwright on the
19 resources deployed.

20 A. Yeah, that that's my recollection of it, yes.

21 Q. So your recollection at that time was that Station
22 Manager Cartwright was in attendance by 16.49 --

23 A. That was my recollection, yeah.

24 Q. -- but that you were still the incident commander at
25 that time?

1 A. Yes, yes.

2 Q. So you don't think that when Station Manager Cartwright
3 arrived he immediately said to you, "I'm now taking over
4 as incident commander"?

5 A. Not that I recall, no.

6 Q. So, in summary, we have messages indicating that you
7 took over as incident commander at 16.29, and
8 Station Manager Cartwright took over from you at around
9 16.55?

10 A. That would appear to be accurate, yes.

11 Q. Whilst you were incident commander, did you remain in
12 one place or did you move around?

13 A. No, I was confined to the green area, I didn't move from
14 the green area in --

15 Q. We'll have a look at a photograph to see if we can work
16 out where you were.

17 A. Yeah.

18 Q. What you're looking at here is an aerial photograph,
19 photograph 3, of Lakanal House, which is shown in the
20 middle of the picture where the white arrow is now.

21 A. Yes.

22 Q. To the left of it is the west side, to the right of it
23 is the east side. Does that help you to remember where
24 you positioned yourself?

25 A. Yes, I was on the grass on the west side.

1 Q. So around where I'm pointing now with my arrow?

2 A. Round about there, yeah.

3 Q. Thank you. Let me then ask you about what you had
4 available to you to provide you with information.
5 Firstly, you obviously had what you could see and what
6 you could hear and what you could smell.

7 A. Yes.

8 Q. But other than that, you had to rely on others,
9 I assume, for information about what was happening
10 inside the building and indeed on the other side of the
11 building?

12 A. That's correct, yes.

13 Q. Can we just run through what sources information was
14 coming to you from. I'll run through a list of
15 possibilities, if you could help us by confirming
16 whether or not you were getting information from such
17 sources. Firstly, were you directly able to listen to
18 radio messages from brigade control?

19 A. Not from where I was standing, no.

20 Q. Is that because they can only be heard if you're by
21 an appliance?

22 A. Yes.

23 Q. Did you have a personal radio?

24 A. Yes.

25 Q. Do you recall what channel that was on?

1 A. It would be channel 1, command channel.

2 Q. Were you able to hear what firefighters who were using
3 breathing apparatus were saying on their radios?

4 A. No.

5 Q. Presumably you were regularly talking to other
6 firefighters around you?

7 A. Well, in the initial stage -- we're talking about when
8 I just turned up now, are we?

9 Q. No, I'm talking in general terms about how you were
10 getting information whilst you were standing where you
11 were throughout the time as incident commander?

12 A. Yes, yes, on channel 1 I was getting information -- or
13 overhearing information between crews, or between crew
14 managers and watch managers, but obviously I could not
15 speak directly to BA crews.

16 Q. You started out with Crew Manager Willett with you?

17 A. Yes.

18 Q. Would it be right to assume that there was never a time
19 when you were standing entirely on your own?

20 A. That's definitely the case, yes.

21 Q. Did you have any direct contact with members of the
22 public?

23 A. I -- there -- yes, I did, there were members of the
24 public around me, I can't remember how many now.
25 I remember a brief conversation with -- with one,

1 I think quite early on in the incident, and latterly
2 I remember the Crew Manager Hider, whom I got to assist
3 me with collating information, he was speaking to
4 members of the public as well.

5 Q. Were notes passed to you to read?

6 A. I am not sure, to be honest with you, I can't remember.

7 Q. You obviously remember people telling you things, but
8 you don't specifically remember people handing you notes
9 to read?

10 A. Not at that stage, not that I can remember, no.

11 Q. Not at all whilst you were incident commander?

12 A. No, I can't -- I can't hand on heart say that I received
13 anything like that.

14 Q. Did you have information coming to you from any other
15 sources than the ones that we've gone through on that
16 list?

17 A. Yes, there were -- I was getting information from
18 members of the police, members of the London Ambulance
19 Service, various crew managers or watch managers --
20 well, brigade personnel -- who had arrived and overheard
21 radio traffic. There's a huge amount of information
22 coming in to me.

23 Q. Turning then to the methods used by you to give
24 instructions as incident commander about what you wanted
25 done, were you able to give instructions directly to

1 brigade control?

2 A. No, not -- no, not me, no, I couldn't.

3 Q. So if you wanted some instructional message passed to
4 brigade control, you'd have to ask somebody to action
5 that for you?

6 A. Yes.

7 Q. Did you use your personal radio to give instructions?

8 A. Yes.

9 Q. I presume from what you said earlier that you weren't
10 able to give instructions directly to firefighters
11 wearing and using breathing apparatus in the building?

12 A. That would be correct, yes.

13 Q. Presumably you did give instructions to other London
14 Fire Brigade personnel who were gathered around you or
15 came over to you?

16 A. Yes.

17 Q. Did you give any instructions to residents?

18 A. No.

19 Q. Did you give any instructions to other emergency
20 services?

21 A. No, not that I remember.

22 Q. But if you wanted to, it would have been possible for
23 you to speak directly to one or more residents or
24 members of the emergency services at some times?

25 A. Sorry, could you repeat the question?

1 Q. Yes. You told us earlier that you were getting
2 information, sometimes from residents and sometimes from
3 emergency services, and I assume it follows from that
4 that you had enough contact with them to be able to give
5 them instructions as you wanted to.

6 A. Yes, that would be true.

7 Q. Did you at any time give instructions on written notes,
8 or was it all verbal?

9 A. I do not recall giving written notes myself.

10 Q. What I've done there, I hope, is to create some sort of
11 picture of where you were and what you could see and who
12 was around you and how information came to you and how
13 instructions were given by you. If there's anything
14 you'd like to add to complete that picture, then please
15 do so.

16 A. Well, yeah, I mean obviously when I was ready to deploy
17 crews I would do that face to face, so that would be the
18 other sort of line of communication.

19 Q. Thank you. Before going but the events whilst you were
20 incident commander in detail, I'd like to look with you
21 at two new policy documents that the members of the jury
22 won't have seen before. The first is London
23 Fire Brigade policy number 633 on high rise
24 firefighting. I'll put that up on the screen, it's in
25 the advocates' bundles at page 1518. Can you see it

1 clearly enough on the screen, just to identify it?

2 A. Yes.

3 Q. Is that a document that you are familiar with?

4 A. Yes.

5 Q. In that case, I'm going to ask that it be added to the
6 jury bundle at tab 19. Mr Clark has copies. Have you
7 been given a hard copy?

8 A. No, I haven't got one to hand.

9 THE CORONER: I think you might have open in front of you
10 bundle number 4, so you could look at it at page 1518.
11 Do you have that?

12 A. Yes, madam.

13 THE CORONER: Thank you. (Pause)

14 MR MAXWELL-SCOTT: I'll just wait until everybody has their
15 copies in the appropriate place.

16 THE CORONER: Yes, I think it's fine to carry on, thank you.

17 MR MAXWELL-SCOTT: You'll see on the first page it's policy
18 number 633, issued on 26 November 2008.

19 A. Yes.

20 Q. Then on the next page it's headed, "Key point summary"?

21 A. Yes.

22 Q. There are then six headings. I'll just identify at this
23 stage, there's one about pre-planning which says:
24 "Check pre-planning information and inform crews, eg
25 access, fixed installations and predetermined actions."

1 Then the headings are "Command function", "Securing
2 a water supply", "Securing a firefighting lift",
3 "Establishing a bridgehead" and "Committing crews". If
4 you go over to page 1520, the introduction says that:

5 "This operational procedure is designed to provide
6 guidance for operational personnel who are engaged in
7 search, rescue and firefighting in high rise buildings."

8 So in other words people like yourself?

9 A. Yes.

10 Q. The next paragraph, 1.2, says:

11 "The procedure outlined may be modified or adapted
12 depending on pre-planning information or prevailing
13 circumstances, however this should only be done as
14 a result of dynamic risk assessment by the incident
15 commander."

16 Then section 2 is a list of hazards and operational
17 considerations. We'll come back to one or two
18 paragraphs later in more detail, but just to identify
19 the document, at 1521, section 3 is on pre-planning,
20 section 4 is operational procedure, and paragraph 4.1
21 says this:

22 "The incident commander should remain at ground
23 floor level and implement the command function in
24 accordance with policy number 408 incident command.
25 This is unless pre-planning arrangements have identified

1 the more appropriate location, eg fire control centre."

2 Then at the bottom of 1522, there's a list of
3 firefighting considerations. I'll come back to a couple
4 of those later. Then the appendices start at 1525.
5 Appendix 5 on 1529 is about pre-planning.

6 A. Yes.

7 Q. I showed you a moment ago the reference to policy number
8 408, incident command. Is that a policy that you were
9 also familiar with?

10 A. As I understand it, there are -- or were -- several
11 policies regarding the command role, I wouldn't, off the
12 top of my head, know -- be able to distinguish which one
13 was which without seeing it.

14 Q. Let me show it to you. This is in the same version of
15 the advocates' bundle, starting at page 1572. Take as
16 long as you need to see if you recognise that document.

17 A. Well, I wouldn't say -- other than the diagram of the
18 decision making model itself, I wouldn't say I'm
19 familiar with every page of it. I recall that there was
20 also a separate policy based -- or entitled "Decision
21 making model".

22 Q. You're absolutely right about that, and just to refresh
23 your memory, that's at page 1597. Is that what you were
24 referring to?

25 A. Yes.

1 Q. Are you familiar with the decision making model?

2 A. Yes, I would say I am, yes.

3 Q. Can you just explain in your own words briefly to the
4 jury what the decision making model is?

5 A. Yes, it's a management tool for taking you through the
6 steps of arriving at a decision, or in fact you could
7 apply it to the whole incident. It's a logical sequence
8 of steps that you go through to identify -- or
9 information gathering -- gathering and thinking time,
10 setting your objectives and deciding on a plan, and then
11 things like communicating and controlling.

12 Q. Can I show you a diagram that may illustrate what you're
13 describing to the jury, page 1576?

14 A. Yes.

15 Q. Does that --

16 A. Yes.

17 Q. -- put in diagrammatic form what you were describing to
18 the jury?

19 A. Yes.

20 Q. As it happens, if you look back four pages you'll see
21 this diagram is within the incident command policy
22 number 408. What that policy, as I understand it,
23 essentially does is to explain how the decision making
24 model is used when one is acting as incident commander.

25 A. Sorry, what page was that?

1 Q. 1572 is the first page of this document.

2 A. Yes, I can see that, yeah.

3 Q. If you just turn over the pages back to 1576, the text

4 under the diagram says:

5 "A full understanding of the DMM [decision making

6 model] is required before attempting to apply it to

7 incident command. A detailed explanation of the DMM can

8 be found in the main body of this instruction."

9 A. Yes, I see that.

10 Q. Just going through very quickly to refresh your memory,

11 you then see applied to incident command the decision

12 making model which you've explained you were familiar

13 with. So on page 1577 there's "Information about the

14 task event"; on 1578, "Information about resources";

15 1579, "Information about risks and benefit"; 1580,

16 "Information on progress"; 1581, "Objectives"; 1582,

17 "Planning"; 1583, "Communicating"; 1584, "Controlling"

18 and "The issuing and receiving of orders"; 1585,

19 "Evaluating"; 1586, "Information on progress"; and 1587,

20 "Outcome".

21 A. Yes.

22 Q. Can you confirm that the diagrams that we've looked at

23 very quickly are the diagrams that you are familiar with

24 as part of the decision making model?

25 A. Yes.

1 Q. Before finally turning to the events of the day, let me
2 ask you these general questions. Did you make any notes
3 yourself whilst incident commander?

4 A. I -- I'm not sure, I don't recall either way, to be
5 honest.

6 Q. Do you recall if at any point you had somebody by your
7 side making notes for you?

8 A. Yes, Crew Manager Hider was.

9 Q. Can you tell the jury what steps you took to be in
10 a position to brief the next incident commander, should
11 there be one?

12 A. Well, I would have -- because it was so dynamic, and
13 I was trying to reduce my -- the lines of communication
14 coming directly to me so that I could concentrate on
15 getting crews briefed, I -- the information gathered by
16 Crew Manager Hider, it was my expect -- expectation that
17 he was going to hand that -- I would be able to refer to
18 him to be able to pass that information to the oncoming
19 station manager.

20 Q. Just dealing with this point while we're here, as far as
21 you recall, was Crew Manager Hider involved in the
22 briefing of Station Manager Cartwright?

23 A. I am not sure of the actual dynamic, because -- I can't
24 remember, I just remember that it was very, very
25 dynamic, I wouldn't say panic stations, but it was --

1 there was a lot of activity involved around the upward
2 spread of fire, rapid upward spread of fire -- or
3 downward spread of fire, I should say -- which
4 necessitated the movement of the bridgehead.

5 Q. We'll come to that, but in short you don't recall
6 whether or not Crew Manager Hider was involved in the
7 briefing of Station Manager Cartwright?

8 A. I can't confirm one way or the other, no.

9 Q. Mr Howling, I'm now going to go through with you the
10 events from when you were called out at 16.21 to when
11 Station Manager Cartwright replaced you as incident
12 commander and you finished briefing him. Before doing
13 so, let me say this: I'm conscious that there will have
14 been times during that half hour or so that more than
15 one thing was happening at the same time.

16 A. (The witness nodded)

17 Q. I can only ask you one question at a time, and I can
18 only ask you about one event at a time. At times I will
19 ask you about what order you believe events happened in,
20 but if at other times you think that events happened in
21 a different order to the order in which I'm asking you
22 about them or at the same time, then you should say so;
23 is that clear?

24 A. Yes, understood.

25 Q. Just picking up some points that you have made

1 previously in witness statements about the fact that
2 many things were happening together, if I could refer
3 you to your second witness statement, the witness
4 statements bundle at page 286, you see at the very
5 bottom of the first paragraph the phrase:

6 "There were some difficulties getting messages over
7 the radio."

8 Do you have that?

9 A. Yes.

10 Q. Was that a problem whilst you were incident commander?

11 A. Yes, it was the sheer volume of the radio traffic.

12 There were lots of people speaking on the radio, and
13 I had delegated Crew Manager Willett to maintain
14 communications with the bridgehead, 'cos I was
15 struggling to pick up on what was being said between
16 Crew Manager Willett -- Crew Manager Willett,
17 Crew Manager Dennis at the bridgehead and myself,
18 I couldn't understand what he was saying.

19 Q. Then the next paragraph says this:

20 "During the initial stages, it was very chaotic.
21 I was being overwhelmed with information from crews
22 I had deployed plus other sources. I also tried to
23 reduce my span of control as I felt overwhelmed with all
24 the information and attempting to make sense of it all,
25 establishing where everyone was in relation to the

1 incident, including calls from the public and getting
2 the information to the crews. More crews were coming up
3 to me requiring briefing as well as enquiries and
4 information from the police, London Ambulance Service
5 and members of the public. I was consciously trying to
6 remain calm externally, as I was managing a large volume
7 of information whilst this was going on. It was very
8 dynamic and the timescale of my arrival and escalation
9 felt like only a couple of minutes."

10 Does that still reflect how you recall what it was
11 like to be incident commander on that afternoon?

12 A. Yes, absolutely.

13 Q. Having tried to give that introduction to put the events
14 that followed in context, let's start from the very
15 beginning when you were first called out. How did you
16 receive the call out?

17 A. When we were in the station and all three appliances
18 were mobilised at the same time.

19 Q. How did the information come to you?

20 A. On the teleprinter.

21 Q. Is the teleprinter the same thing as a call slip?

22 A. Yes, a call slip is produced by the teleprinter.

23 Q. You told us that you knew you were going to be the
24 incident commander once you reached the scene. Were you
25 aware that the fire was in flat 65 on the 9th floor?

1 A. Without looking at my notes, I don't remember if it had
2 where the flat -- the actual fire was, I can't remember,
3 without looking at the call slip.

4 Q. Crew Manager Willett gave evidence, and evidence that we
5 heard from him is that that information, in other words
6 that the fire was in flat 65 on the 9th floor, was on
7 the teleprinter.

8 A. Okay, yeah, I'll go with that. It probably was,
9 I don't -- I can't remember.

10 Q. If it wasn't on the teleprinter, or you didn't absorb
11 that information at the time, then when would have been
12 the first time that you were aware that the fire started
13 in flat 65 on the 9th floor?

14 A. Well, assuming that Peckham's appliances didn't have
15 that information either, it would have been, you know,
16 a case of -- sorry, could you repeat the question?
17 I lost my train of thought.

18 Q. You were telling us that you couldn't be sure whether
19 you knew at the outset that the fire had started in
20 flat 65 on the 9th floor, so what I was then trying to
21 explore with you is if -- let's assume, you didn't know
22 that at the outset, when would you and did you become
23 aware of it for the first time?

24 A. Well, no, I mean, I would have looked at the call slip,
25 and if it had 65 on it, I would have been aware,

1 wouldn't I, but -- is that your question?

2 Q. You're not sure that that's what the call slip said, are
3 you?

4 A. Well, I can't remember it now, but if I was to see
5 the call slip, I would be able to see that, you know.

6 Q. Do you remember a time when you suddenly learnt for the
7 first time at the fire ground that the flat on fire was
8 number 65?

9 A. Well, I would -- I would have used the call slip and
10 read it and seen that it was flat 65, and I would have
11 got that confirmed by Crew Manager Willett or the
12 bridgehead commander.

13 Q. So is it reasonable for us to assume that you knew from
14 the outset that the fire was in flat 65 on the 9th
15 floor?

16 A. Yes.

17 Q. Turning, then, to the early radio messages that were
18 sent that afternoon, Crew Manager Willett sent a message
19 at 16.24 making pumps four. It's probably easier for
20 everyone to follow this by reference to the sequence of
21 events in the jury bundle at tab 12. Just to explain,
22 this document summarises information that we have from
23 the time of radio messages and phone calls and the like
24 into a convenient form for you and the members of the
25 jury. Have you found the "make pumps four" message on

1 the second page, 16.24?

2 A. Yes.

3 Q. Do you remember hearing that?

4 A. Yes.

5 Q. Then at 16.25.45, there's a radio message to E351, was
6 that your appliance?

7 A. Yes, my recollection is that they were originally trying
8 to call up Echo 371 and they were unable to do so, so
9 I answered the -- the radio message.

10 Q. Let me show you that radio message in the original form,
11 which is at page 442 of the advocates' bundles. Do you
12 have that?

13 A. I'm afraid I don't, actually.

14 Q. I'm sorry?

15 A. I don't have it.

16 Q. Ah. Mr Clark will help you. (Handed)

17 You may not have seen that document before, but it's
18 a typed up version of what was said over the radio. You
19 see the one at the top, 16.25.45?

20 A. Yes.

21 Q. The message from control read:

22 "Echo 351, it would seem that the smoke for this
23 flat is at number 79 and we still have the caller on the
24 line. On your arrival could you please investigate
25 flat 79, over."

1 Then the response was:

2 " ... received, over."

3 Did I understand from your answer a few moments ago
4 that you think you were the person who received that
5 message?

6 A. I believe I was, yes.

7 Q. So it would be you saying, "received, over"?

8 A. I believe it was, yes.

9 Q. Your witness statement, which I'll turn up if necessary,
10 says that you passed that information on. It says:

11 "Noted on the call slip and passed it on."

12 Do you want to see that in the statement?

13 A. No, I'm aware of that. Yes.

14 Q. Who did you pass it on to?

15 A. Initially, I -- what I -- what I recollected is I had
16 the call slip with me, once Firefighter Mullins reported
17 back to me, I gave the call slip to him, it was my
18 recollection, and it still had the 79 on it, because
19 I wanted him to use that information on the call slip,
20 the address and everything, to form the basis of my
21 informative messages, but between me doing that, giving
22 it to him, I briefed Crew Manager Clarke -- is my
23 recollection -- with -- with a view to going up and
24 identifying where the flat was.

25 Q. I'll come to that in a moment. Let me ask you now about

1 your initial impressions on arriving at the scene before
2 you took over as incident commander. What was your
3 initial assessment?

4 A. Upon my arrival, I could see there was a developed fire
5 on the 9th floor, I could see some flame out -- coming
6 out of the 9th floor window, and quite a lot of smoke
7 around the area. Yeah, and as -- as I was looking up at
8 it, I could see that water was being applied to the
9 fire, because I could see spray coming out of the
10 window, so my -- just from a visual point of view,
11 I thought that the fire would be contained within that
12 flat before too long.

13 Q. Let we just pick up on that last point you made about
14 water coming out of the window, because I think that
15 cannot be right as an initial impression on arrival
16 before you took over as incident commander, because I'll
17 show you a record in a moment, but our understanding is
18 that the first crew hadn't yet started up its breathing
19 apparatus at that time.

20 A. That's possible, actually, yes. I mean, I don't know,
21 but at some stage, the -- the fire looked to me as if --
22 you know, water was being applied to it and it wasn't
23 spreading.

24 Q. But you're not confident that that was something that
25 you saw when you first arrived?

1 A. No, that's just my recollection now three and a half
2 years later.

3 Q. You mentioned the serious fire on the 9th floor. What
4 about the 10th floor, what was happening on the 10th
5 floor?

6 A. On my arrival?

7 Q. Yes.

8 A. I -- I -- I'm not sure, I mean I don't recall the fire
9 spreading upwards upon my arrival, you know, obviously
10 it was a concern of mine, because fire will spread
11 upwards, as will smoke and other hot products of
12 combustion.

13 Q. Did you form any initial impression about how serious
14 the fire might become and what resources might be needed
15 in due course to deal with it?

16 A. Yes, I mean I -- I was conscious of the fact that any
17 high rise incident is fairly resource intensive. That
18 said, you know, previous experience would also lead me
19 to believe that a fire contained within -- within one
20 flat -- or could be contained within one flat for up to
21 an hour, you know, because of the building construction,
22 and, in that case, the resources for a four pump
23 attendance would probably be sufficient.

24 Q. Let me just ask you a question in this way:
25 Crew Manager Clarke told this court that when he was

1 arrived that he was convinced that more appliances would
2 be coming and would be needed. I just wonder whether
3 thoughts like that went through your mind on arrival or
4 not?

5 A. Yes, certainly it was in my -- in my consideration -- it
6 was in my considerations for the incident as time went
7 on, yes.

8 Q. What could you see being done by your colleagues in the
9 London Fire Brigade on arrival? Obviously others had
10 got there before you had.

11 A. Well, yeah, I mean Peckham's crews had successfully set
12 up the pump to supply water from a hydrant via the pump
13 into the dry rising main, they'd successfully taken the
14 initial high rise equipment upstairs, they'd got the
15 fire lift, as far as I -- well, perhaps, I'm not sure at
16 the time -- but they were in the process of getting the
17 fire lift working, and they were prepared at the
18 bridgehead -- you know, sat at the bridgehead ready to
19 go in and -- and start the fire.

20 Q. Did you notice anything falling down from the building?

21 A. As I approached it, I do recall some small particles,
22 probably just glass, but from what I remember, I don't
23 remember seeing burning things coming down in the early
24 stages.

25 Q. If I just refer you to some evidence that we heard

1 already in this court from some of your colleagues in
2 the London Fire Brigade to see if that jogs your memory
3 at all. Crew Manager Willett said that debris was seen
4 on approach, including window frames. Firefighter
5 Sharpe said he saw burning debris falling, and
6 Firefighter Sanchez, who was from the Old Kent Road,
7 said that big pieces of frames were alight, one went
8 under a car alight, do you remember that at all?

9 A. I remember it, but I don't recall it being on the early
10 stages as I approached Crew Manager Willett. You know,
11 that's my recollection, perhaps I was just too focussed
12 on getting to him and finding out what was going on.
13 Certainly things were falling down, the size of them and
14 whether they were burning or not I don't recall, but
15 certainly as the incident progressed, you know, it
16 was -- there were quite -- as they said, lots of things
17 were falling down, large pieces of -- of the building.

18 Q. Moving on then to a conversation you had with
19 Crew Manager Willett, did you know him personally at
20 that time?

21 A. No.

22 Q. How did you know that he was the incident commander?

23 A. Because he was in the command position, ie on the ground
24 floor, I knew -- I knew he would be in charge of it
25 because of the call slip information, and obviously his

1 rank markings on his helmet identified him as a crew
2 manager.

3 Q. Was he standing in the same position that you explained
4 to the jury you came to stand in as incident commander?

5 A. Initially, as I recall, no because he was a bit closer
6 to the main entrance and his pumping appliance, and
7 obviously the fact it was pumping was quite -- it
8 creates quite a noise, and in order to make ourselves
9 heard we -- we stepped back away from the appliance, and
10 obviously that coupled with the fact that there was some
11 debris coming down in that vicinity.

12 Q. The conversation that you had with him in which he
13 handed over to you and you became incident commander,
14 can you recall approximately how long that was?

15 A. It was two or three minutes, I should think, I mean I --
16 I used the decision making model as a guide, you know,
17 trying to put it out in a sequence that we could -- so
18 we didn't miss anything, and -- and I could, you know,
19 absorb that information and make my plan and objectives.

20 Q. Would that be two or three minutes uninterrupted, or
21 were other things happening?

22 A. No, obviously, it would have been interrupted, because
23 other crews needed to be -- well, my crews, if you like,
24 needed to be deployed.

25 Q. Was anyone else involved in that discussion?

1 A. Not the handing over, no.

2 Q. Was anyone else present during it?

3 A. I -- I'm not sure, but obviously, I know for a fact that
4 Crew Manager Clarke came up to us in that -- in that
5 timeframe, because I directed him to do some tasks. He
6 wasn't actually part of the conversation, though.

7 Q. Did you, in the course of that conversation, ask
8 Crew Manager Willett any questions about the layout of
9 the building?

10 A. I don't recall specific questions, although as I said,
11 going through the decision making model, I would have --
12 I would have covered those points. From what I recall,
13 there was -- having had the conversation, I wasn't
14 really aware of things such as the building layout.

15 Q. As a result of that conversation, did you become aware
16 that the flats in the building were maisonettes, in
17 other words flats on two floors with internal
18 staircases?

19 A. I'm not sure as a result of that conversation, but I was
20 aware that there were maisonettes within -- you know,
21 within the period I was incident commander.

22 Q. Do you recall how you became aware that they were
23 maisonettes?

24 A. Well, specifically, I -- one -- the trigger that
25 I probably -- this is probably the most accurate one --

1 was that the crew asked for a short extension ladder to
2 bridge a staircase within the flat, which would imply
3 that the flats were on two floors.

4 Q. Did you make that conclusion, did you reach that
5 conclusion at the time, on hearing that they wanted
6 an extension ladder, did your mind work through that
7 this meant you were dealing with maisonettes?

8 A. Yes.

9 Q. Do you think that that was the first time that you
10 realised that?

11 A. I -- I don't know, to be honest.

12 Q. As a matter of logic, until you know or believe that
13 they are maisonettes, you would be assuming, would you
14 not, that the flat on the 10th floor above the flat on
15 fire on the 9th floor is a separate flat?

16 A. Yes.

17 Q. Do you recall when you learnt that there was no central
18 corridor on the even-numbered floors, so for example
19 floors 8, just above the bridgehead, and floor 10, as
20 well as the other even-numbered floors?

21 A. No, I don't recall when that was.

22 Q. Do you recall what Crew Manager Willett said to you
23 about the extent to which crews had been committed?

24 A. No, I -- I just recall that they were -- that they were
25 up at the bridgehead and, you know, that resources had

1 been -- been collected there, they were ready to go.

2 Q. This may sound an obvious question, but did you know

3 what task they'd been given?

4 A. Obviously firefighting, I'm not aware that he mentioned

5 anything about searching at that stage.

6 Q. So does it follow that, as far as you knew, nobody at

7 that stage had been tasked to follow up the message from

8 brigade control about flat 79?

9 A. I would suggest that would be right, yeah.

10 Q. Turning now to the point when you take over as incident

11 commander, how many crew members from Peckham fire

12 station would have been near where you were?

13 A. I just recall the -- the pump operator being nearby, and

14 obviously Crew Manager Willett. I don't remember anyone

15 else being there.

16 Q. You mentioned the pump operator, would it be right that

17 in fact there would be two pump operators, one for each

18 pump?

19 A. Well, yeah, from what I remember there was only one

20 pumping appliance pumping at that time, when I -- when I

21 was getting the brief from Crew Manager Willett, so

22 there were -- as far as I remember there was only one

23 pump operating.

24 Q. You don't remember both of the drivers, Firefighter

25 Crowley and Firefighter David Sharpe, being in the area?

1 A. They may have been, I -- you know, I didn't know
2 anyone's names, I don't know who was who, so they may
3 have been there, I don't know.

4 Q. Around the time that you became incident commander, the
5 aerial ladder platform arrived from the Old Kent Road?

6 A. Yes.

7 Q. We have it recorded as arriving at 16.29, and with its
8 arrival, that meant that there were 11 crew members from
9 the Old Kent Road on the scene, including yourself?

10 A. Yes, that's correct.

11 Q. Presumably you could see two appliances from Peckham
12 fire station in attendance?

13 A. Yes.

14 Q. That would be eight further crew members --

15 A. Yes.

16 Q. -- making a total of 19 firefighters.

17 A. Yes.

18 Q. Was one of the first things that then happened that E351
19 became the command pump?

20 A. Yes, that's correct.

21 Q. Can you just explain to the members of the jury what
22 that means?

23 A. The incident command pump is set up as an interim
24 command appliance, until the command unit arrives and is
25 set up. The purpose of the incident command pump is to

1 gather information regarding the appliances in
2 attendance, the list of all the names of the
3 firefighters in attendance, which is on a nominal roll
4 board, one of which is carried on each appliance.

5 So the incident command pump operator would have to
6 go to each individual appliance and collect their
7 nominal roll boards. He would have to identify the
8 incident command pump which, as was said, was Echo 351.
9 That would be identified by having the blue beacons left
10 on, which would need that all the other appliance
11 beacons would need to be turned off, so it becomes
12 a focal point for oncoming appliances and senior
13 officers coming on.

14 The incident command wallet operator, who's the ICP
15 operator, would also start recording information about
16 the incident. He's got a facility for drawing a plan,
17 for writing down information such as the time of call,
18 the address, and any other information from the call
19 slip --

20 Q. Just pause there, who was tasked with that?

21 A. That was Firefighter Mullins.

22 Q. Was there anything else you wanted to add?

23 A. No, I'm just trying to emphasise it's quite an important
24 job and needs to be done early on, and -- oh, the other
25 thing was that when you set up the ICP you inform

1 control by the radio that -- which appliance is the ICP
2 and who is the incident commander.

3 Q. Madam, that's probably a convenient moment for a mid
4 morning break.

5 THE CORONER: Yes, all right. Thank you very much. Yes,
6 we'll have a break of about 10 minutes, so if we could
7 be back in just after 11.30, please. Members of the
8 jury, do go with Mr Graham, please leave your papers if
9 you like.

10 Mr Howling, you're part way through giving your
11 evidence, and the rule which I do ask you to comply
12 with, please, is that you must not talk to anyone at all
13 about your evidence or indeed about these matters.

14 A. Yes, madam.

15 THE CORONER: Thank you very much.

16 (11.23 am)

17 (A short break)

18 (11.33 am)

19 THE CORONER: Thank you.

20 MR MAXWELL-SCOTT: Mr Howling, just before the break you
21 were telling the jury about the setting up of a command
22 pump, and you mentioned the incident command wallet. Do
23 you know if one was in fact set up and used on E351?

24 A. I don't know for certain but, you know, it was the task
25 I gave Firefighter Mullins to do.

1 Q. I'm going to move on now in the chronology and ask you
2 about another radio message to do with flat 79, and this
3 is at page 442 in the advocates' bundles, the same page
4 I have up on screen. It's the same page we looked at
5 before. It's the penultimate message, 16.28.54, and
6 this one is to E355, and the message is:

7 "It was just further information regarding the last
8 message about flat 79. The caller is still on the line
9 and is apparently trapped in the flat."

10 Then E355 responded:

11 "Received, I'll pass that on."

12 Do you recall that message being passed on to you?

13 A. I must say I don't.

14 Q. Of course, the difference between that message and the
15 one at the top of the page we looked at before,
16 16.25.45, is the reference to the person in flat 79
17 being trapped.

18 A. Yes, I see the difference.

19 Q. But otherwise they both contain the message that the
20 number in question is flat 79 and they both say that the
21 caller is on the line.

22 A. Yes.

23 Q. So you already knew that there was an issue with flat 79
24 and that the caller was on the line, but if this message
25 wasn't passed to you, you would not have had the

1 additional information that the caller was apparently
2 trapped?

3 A. Yeah, I don't remember getting that message.

4 Q. Presumably, if all systems had operated smoothly then it
5 would have been passed to you?

6 A. Yes, certainly.

7 Q. I'm going to ask you now about a topic to do with
8 finding out about the location within the building of
9 flat 79 and the layout of the building, and in order to
10 do so I'm going to ask you to look again at the high
11 rise firefighting policy, which is now in the jury
12 bundle at tab 19.

13 The front cover of it we've already seen at 1518,
14 and then over the page at 1519 is a one-page key points
15 summary. The first heading is "Pre-planning" and it
16 says "Check pre-planning information", and then the next
17 heading is "Command function", and it says:

18 "The incident commander should remain at ground
19 floor level unless pre-planning identifies otherwise."

20 Then the fifth heading is "Establishing the
21 bridgehead" and the second bullet point is:

22 "The bridgehead should be established in a area of
23 safety two floors below the fire floor, unless
24 pre-planning information demands otherwise."

25 So the point I draw your attention to there is that

1 pre-planning information may be important for a range of
2 reasons, including fundamental things at the start of
3 the incident, such as where the incident commander
4 should be positioned and where the bridgehead should be
5 positioned, do you agree?

6 A. Yes.

7 Q. Then if I take you to 1522, you see "Establishing
8 a bridgehead" is the heading.

9 A. Yes.

10 Q. Paragraph 4.14 says:

11 "As the water supply is being secured a minimum of
12 four personnel should be dispatched to the bridgehead."

13 It goes on to say:

14 "They are to provide the following items of
15 equipment ..."

16 The final one of which is "floor plans, if
17 available". What I want to ask you is what steps you
18 took to locate pre-planning information that, as we'd
19 seen, might be relevant to where you yourself stood and
20 where the bridgehead was positioned and what was
21 provided to crews at the bridgehead?

22 A. Well, as I understand it, first of all, the crews that
23 were initially deployed had all that equipment with them
24 and the issue of floor plans, I, as a matter of course
25 on the way to an incident, would check our own

1 operational information folder. I do not recall doing
2 it en route specifically to this incident.

3 As part of the information gathering I would have
4 had a briefing with Crew Manager Willett, although again
5 I don't specifically remember asking him. I'm sure the
6 process of the briefing covered whether or not they had
7 the information in there or the operational information
8 folder. In my own experience, because that part of
9 London has so many high rise premises, there's very few
10 which are in the operational information folder.

11 Q. Let's just break that down, because there's quite a lot
12 of information in that answer. Firstly, did you look in
13 the Old Kent Road's operational information folder?

14 A. I can't remember specifically doing it but, as a matter
15 of course, I would do it en route to an incident.

16 Q. Did you ask to see Peckham's operational information
17 folder?

18 A. I didn't ask to see it but from what I recollect I had
19 a discussion with Crew Manager Willett as to whether it
20 was in the folder.

21 Q. Crew Manager Willett's evidence was that at no time did
22 he recall looking in it himself.

23 A. Yeah, I understand. It may have been, you know, that
24 when I asked him, he said "It's unlikely to be in
25 there".

1 Q. Crew Manager Willett, just so you can comment on this,
2 didn't recall you asking him any questions about the
3 layout of the building.

4 A. Yeah, again, it would have been part of the overall
5 line -- you know, information gathering.

6 THE CORONER: Sorry, I didn't understand that.

7 A. In terms of using the decision making model as a guide
8 to follow, I would have asked him if he'd known any
9 information about the building layout, from what I
10 recollect. That's the process I would, you know, adopt.
11 Whenever I've taken over an incident, I would adopt that
12 line of methodology, if you like. So it would have
13 been -- I would have asked him the question about -- if
14 he knew about the layout, as far as I can ascertain.

15 Q. Do you think you asked if any plans were available at
16 the scene?

17 A. Yes, that would have been part of the same questioning.

18 Q. Do you think you asked if there was a central fire and
19 smoke alarm?

20 A. I don't recall that, no.

21 Q. Do you think you asked if there was a central sprinkler
22 system?

23 A. No, I didn't ask that, that was probably -- it would
24 have been apparent if there'd been a sprinkler system.

25 Q. Did you ask whether any other firefighters from Peckham

1 fire station had been to Lakanal House before?

2 A. No.

3 Q. Can you tell us why not?

4 A. There was -- well, other than the pump operators --
5 well, pump operator, who was busy doing that task, and
6 Crew Manager Willett, it wasn't -- yeah, I -- there was
7 no-one to verify one way or the other the layout of the
8 premises.

9 Q. There were eight firefighters there at the scene from
10 Peckham fire station, weren't there?

11 A. Yeah, they were up in the bridgehead, other than the two
12 I've mentioned. In fact, Crew Manager Dennis wasn't
13 actually from Peckham, was he?

14 Q. That's true, but there were certainly, I suggest, two
15 drivers and Crew Manager Willett at ground level on the
16 west side of the building. Would it not have been
17 possible to ask them if they had been to Lakanal House
18 before?

19 A. It would have been possible, it would have meant them
20 interrupting whatever task they were given. Yeah,
21 I mean, I was conscious of the fact that I could
22 probably just as expediently deploy my own resources to
23 find out the layout of the premises or in fact my
24 objective at the time was to find out where the flat
25 that I was told about, where it was in relation to the

1 fire.

2 Q. If you could have a look in the jury bundle at tab 15,
3 please, and then turn within it to page 1137. 1137 is
4 the first slide of a training package developed by the
5 London Fire Brigade for operational personnel in
6 November 2008. Just take a moment to see whether that
7 is a training package that you recognise.

8 A. It is, yes.

9 Q. If you look, then, to page 1151, do you see there's
10 a slide that is called "En route"?

11 A. Yes.

12 Q. Our understanding is that people receiving this training
13 would see the slide, but people giving the training
14 would have access to these notes.

15 A. Yes, that's correct.

16 Q. You would be somebody who would have that access to
17 these notes, wouldn't you?

18 A. I would. I would just like to say that I had only been
19 at Old Kent Road, doing the watch manager role, for
20 a few weeks, so I would never have delivered this
21 myself.

22 Q. Just looking at the final bullet point, the heading is
23 "En route":

24 "A range of information will be available to
25 incident commanders who are en route to an incident and

1 should be considered."

2 Then the final bullet point is:

3 "Local knowledge of crew and incident commander."

4 A. Yes.

5 Q. Then if we go back to tab 19 to the high rise
6 firefighting policy itself, I want you to look at
7 appendix 5 on pre-planning, which is at 1529. Do you
8 have that?

9 A. Yes.

10 Q. It says at the top:

11 "Pre-planning for fighting fires in high rise
12 buildings should include ..."

13 The first bullet point:

14 "Station personnel familiarising themselves with all
15 high rise buildings on their station's ground."

16 Then about halfway down the page, do you see it
17 says:

18 "During 72D visits, personnel should ensure they are
19 familiar with the following ..."

20 A. Yes.

21 Q. Let me be absolutely clear, for the purposes of these
22 questions I'm not suggesting that all of the information
23 in the bullet points that follow should necessarily be
24 written down, but I am going to suggest that what this
25 document is saying is that persons from Peckham Fire

1 Station who had carried out 72D visits should, when
2 doing so, have insured that they are and were familiar
3 with the features listed in the bullet points; do you
4 understand?

5 A. Yes.

6 Q. Do you agree with me that on the strength of this
7 document there would have been reasons to think that
8 Peckham firefighters at the scene would have been
9 familiar with bullet point 1:

10 "Location and accuracy of information available on
11 site."

12 That's the implication of the document, isn't it?

13 A. Well, I -- I wouldn't like to be say, to be honest with
14 you. Peckham has got a large ground and they've got
15 an awful lot of high rise premises on their ground, so
16 to expect every firefighter to have even just the broad
17 knowledge of each block would be quite a task.

18 Q. Just picking out two other bullet points, about halfway
19 down it says:

20 "Floor lay outs and fire resisting
21 compartmentation."

22 Do you see that?

23 A. Yes.

24 Q. Then four from the bottom, "Evacuation arrangements".

25 A. Yes.

1 Q. What I'd like to ask you is: do you agree with me that
2 it would be reasonable at least for you to hope that one
3 of the eight firefighters from Peckham fire station who
4 was in attendance on 3 July would have been familiar
5 with the location and accuracy of any information
6 available on site, floor layouts and fire resisting
7 compartmentation and evacuation arrangements?

8 A. I would not be confident that that would be the case,
9 no.

10 Q. Do you agree that it would be worth trying to find out
11 if they had that information?

12 A. Possibly, yes, yes.

13 Q. Did you try and find out if they had that information?

14 A. Well, no, I had no-one to hand, other than
15 Crew Manager Willett.

16 Q. Did you ask anybody whether there were any signs at
17 ground level giving an indication of the layout of the
18 building or the flat numbering system?

19 A. I don't recall asking that specifically, no.

20 Q. Did you ask anybody to look for such signs?

21 A. I don't recall doing that, no.

22 Q. Let me just summarise some evidence that we've heard in
23 this court to the effect that such signs are common.
24 Firefighter Badger told the court that:
25 "They're very common on most high rise buildings,

1 pretty standard."

2 Firefighter Sanchez said:

3 "We have seen Southwark signs before, we understand
4 them, we are used to looking for that kind of sign."

5 Firefighter Miller said:

6 "That's quite typical of high rises in Southwark.
7 Most of them have got one of those signs saying what
8 numbers are on what floors. Most high rises on
9 Old Kent Road's ground would have sign in which would
10 say in the lift lobby area at the bottom."

11 Let me ask you to comment on whether it would be
12 reasonable to expect at ground level in the building
13 there to be some kind of sign to assist people to find
14 their way around the building?

15 A. Yes, yes.

16 Q. Let me ask now for an additional photograph to be
17 produced and added to the jury bundle at tab 14,
18 photo 5. (Handed)

19 THE CORONER: Yes, thank you.

20 MR MAXWELL-SCOTT: Just to explain, Mr Howling, that is
21 a photograph of the front entrance of Lakanal House
22 looking from the west side. As it happens, it was taken
23 at 7.15 or so in the evening of 3 July 2009, but perhaps
24 aside from the quantity of debris that can be seen,
25 would that have been what the front entrance looked like

1 for much of the afternoon?

2 A. I -- at no stage did I get that close to it, but yes,
3 it -- yes, I don't recall the actual layout of the
4 stairway area, or lobby area.

5 Q. Do you recall from where you were standing that there
6 was a fairly obvious front entrance to the building?

7 A. I wasn't aware that it was necessarily the front
8 entrance, it was -- it was the entrance that the -- the
9 crew took to go up, and obviously there was a lobby
10 there to access the fire lift. The firefighting shaft
11 was there.

12 Q. Turning then to that, let me show you another
13 photograph. This is photograph 7 at tab 13. You have
14 it on screen. That is what you find if you go through
15 the entrance that we saw on the previous photograph, you
16 understand?

17 A. Yes.

18 Q. Do you see above the lift shafts the sign on the wall?

19 A. I can see that, yes.

20 Q. I'm now going to show you a close-up photograph of that
21 sign. You, of course, will not have seen that sign
22 before when you were incident commander because you
23 remained in the place which you told us about, but that
24 is the sign which other witnesses have described, in the
25 evidence that I've summarised for you, as very common or

1 quite typical. Would you agree with them that it would
2 be common to find a sign like that at ground floor level
3 in a tower block?

4 A. Yes.

5 Q. Did anyone at the time when you were incident commander
6 ever tell you about the presence of that sign?

7 A. No.

8 Q. I'd like you to look at it with me and consider what
9 information one can get from reading that sign without
10 knowing anything else at all about the layout of the
11 building, okay?

12 A. Yeah, it would appear that the -- the access to the
13 flats is on every other floor, which implies they're
14 maisonettes.

15 Q. Access on every other floor, which implies they're
16 maisonettes; 14 flats a floor --

17 A. Yes.

18 Q. -- flat 65 on the 9th floor --

19 A. Yes.

20 Q. -- and 10th, because they're maisonettes; flat 79 on the
21 11th and 12th floors; do you agree?

22 A. Yes.

23 Q. Do you agree that it also, if you think about it, tells
24 you something about where flat 79 might be in relation
25 to where flat 65 is?

1 A. Yes, I gather it's going to be above it.

2 Q. If you add 14, if there's a logical floor layout,
3 flat 79 will be directly above flat 65, won't it?

4 A. Yes. I'd just like to add that it was quite early on,
5 I think, we did establish that flat 79 was above
6 flat 65, or was above the fire flat -- well, within
7 a reasonable period of time.

8 Q. Well, I'm interested that you say that, Mr Howling,
9 because I'm going to refer you to your second witness
10 statement at page 292 of the statements bundle. Do you
11 see there, the second question, this is March and
12 May 2010:

13 "Was it established that flat 79 was above the
14 fire?"

15 Your answer then was:

16 "No, I was not aware. I recall that
17 Crew Manager Clarke and his crew went up and got some
18 people out. I recorded the information and passed it to
19 others. I don't remember if it was above the fire."

20 That was immediately below a question about:

21 "At the time you were incident commander, was
22 prioritisation achieved regarding the flats indicating
23 increasing urgency?"

24 So the impression I had from reading that was that
25 you were not at any relevant time aware that flat 79 was

1 above the fire, let alone directly above flat 65.

2 A. Yes, it may be that as time has gone on I've got
3 information from other sources that has changed my
4 opinion, but from what I recollect now, is that -- one
5 of the reasons I committed Crew Manager Clarke up there
6 was to -- to look for flat 79, which was above the fire,
7 whether it was directly above the fire or not, you know,
8 I -- I wasn't aware at the time.

9 Q. In the same statement at 286, the penultimate question
10 was:

11 "What was your perception of the location of the
12 flat numbers in relation to the fire?"

13 Your answer in 2010 was:

14 "I had no knowledge of where the flats were. I was
15 waiting for information from the crews and then getting
16 information to the crews."

17 A. Yes, again that was -- part of my information gathering
18 process was to commit Crew Manager Clarke to the upper
19 floors to gather -- or confirm what information I had
20 suspected in relation to where the -- the flat was.

21 Q. Are you able to say today when you think you first
22 learned that flat 79 was directly above flat 65?

23 A. No, I can't say when I definitely found that out.

24 Q. Let me ask you to comment on other possible ways of
25 finding out more about the layout of the building. You

1 knew there had been a caller on the line from flat 79 to
2 brigade control. Would it have been possible to in some
3 way had a three way conversation with them and brigade
4 control?

5 A. I've never known it ever be implemented before, it's
6 something which is not in my experience.

7 Q. Would it have been possible to ask brigade control to
8 ask a caller certain questions about where they were in
9 the building, for example?

10 A. The facility would be there to do that, but obviously
11 there's an awful lot of radio traffic and information
12 being passed to and fro, which would make it quite
13 difficult.

14 Q. Did you consider doing it at the time?

15 A. No.

16 Q. Would it have been possible to have tasked somebody to
17 speak to residents who came out of the building to ask
18 them some basic questions about layout and where flats
19 were?

20 A. It would have been possible, but from my recollection
21 everyone was -- you know, already had a task, and the
22 people who were coming out of the building were
23 dispersing.

24 Q. Would it have been possible to ask somebody from the
25 police or the ambulance service to carry out a task like

1 that?

2 A. Yes, I suppose it would have been.

3 Q. Did you consider doing that?

4 A. No.

5 Q. Would it have been possible to attract the attention of

6 residents on the 1st or 2nd floor and ask them

7 questions?

8 A. Not with the resources that I had to hand at the time.

9 Q. Did you consider doing that?

10 A. No.

11 Q. Would it have been possible to send somebody up into the

12 building, for example to the 1st floor level, to try to

13 work out the layout?

14 A. That's what I -- my objective at the time was to send

15 Crew Manager Clarke up to do that, actually, on the

16 upper floor. In hindsight I could have perhaps got

17 someone else to do it on one of the lower floors, but

18 again resources were stretched at that early stage.

19 Q. Let me move on now to a radio message sent to E372 at

20 16.33, and that's at page 442 in the advocates'

21 bundle -- I apologise, it's 394. It's the second

22 message to E372, and it says:

23 "Trying to get a message to the incident command

24 pump, can you pass this message on, we've had a further

25 call, we're actually with someone on the line at the

1 moment in flat 79, 7-9, the smoke in the flat is
2 becoming quite bad and in flat 68, can you pass this on
3 over."

4 The evidence that we've heard is that that message
5 was picked up by Firefighter Crowley. Do you recall
6 that message being passed to you?

7 A. It's one of many, many messages that I was told about.
8 I don't know if it came directly to me, or maybe to
9 Crew Manager Hider who was assisting at the time, but
10 certainly -- the number 79 is obviously prominent.
11 Number 68, I can't remember being specific at the time,
12 but then there were many other numbers as well. Yeah,
13 I mean, obviously again that was part of my -- my plan
14 was to find out where those -- where those flats were in
15 relation to the fire.

16 Q. Just for your information and to ask you to comment,
17 Firefighter Crowley's evidence to this court was that,
18 after receiving that message, he wrote it down and took
19 it over to you and told you what the message said, and
20 you said:

21 "Yes, I am aware of that information."

22 Do you think that's correct?

23 A. It's possible, yeah. Again, as I said before, some of
24 the information was duplicated, yeah.

25 Q. That is certainly what should have happened, the message

1 should have gone on to you because that's what the
2 control wanted.

3 A. Yes, I'm not denying that I received it, but again it
4 was -- those numbers were given to me along with other
5 numbers, you know.

6 Q. At this stage, as far as radio messages go, you have two
7 numbers and two alone, which are 79 and 68?

8 A. Yes.

9 Q. Turning then to the tasks that you gave to your crews
10 who arrived essentially with you from the Old Kent Road
11 fire station, you told us that Firefighter Mullins was
12 to set up the command pump, and what about Firefighters
13 Belmont, Miller and Sanchez; do you remember what you
14 asked them to do?

15 A. Yes, en route I told my crew obviously that we had a --
16 a four pump fire, and be prepared to rig in BA and all
17 that. That would have been directed at Firefighter
18 Sanchez and Firefighter Belmont. They did that.
19 Firefighter Miller, because he -- I -- I'm not even sure
20 if he had a BA set to wear, but he was to be part of the
21 crew, just to support and provide manpower. The pump's
22 crew, obviously I don't recall speaking to
23 Crew Manager Clarke on the handheld radio en route, but
24 obviously I --

25 Q. I'll come to that, but just sticking with your own

1 crew --

2 A. My own crew, yeah.

3 Q. -- at this stage.

4 A. Yes.

5 Q. So Belmont, Miller and Sanchez you've asked to be ready
6 for breathing apparatus?

7 A. Yes.

8 Q. What about the aerial ladder platform? Firstly, did you
9 have any say in where it was positioned when it arrived?

10 A. Not -- no, no, I didn't.

11 Q. The crew members were Crew Manager Daniel Sharpe and
12 Firefighter Adrian Taylor.

13 A. Yes.

14 Q. Do you recall what initial tasking you gave them?

15 A. Not the initial tasking, no. I mean, I had
16 a conversation with Crew Manager -- Crew Manager Sharpe
17 early on, as I recall, regarding where or whether it
18 would be possible to use the ALP in the approach road.

19 Q. Did he say that he didn't think it would be?

20 A. That's what I remember, yes.

21 Q. So the position at that time when he said that was that
22 the appliance was not going to be used immediately; is
23 that right?

24 A. Potentially, yes.

25 Q. It wasn't used immediately?

1 A. That's correct, yeah.

2 Q. Does it follow from that that the crew of it,
3 Daniel Sharpe and Adrian Taylor, were therefore
4 available to be given other tasks?

5 A. Yes, but, as a matter of course, if something needed to
6 be done they would assist, for example helping with the
7 pumps crew and pump ladders crew to -- to do their
8 tasks, just to make things quick. So they would have
9 been involved in those -- without even me asking them
10 to, they would have assisted asked to make sure that we
11 were ready to be deployed.

12 Q. Would they have been available if you wished to be
13 tasked to find out more information about the layout of
14 the building?

15 A. Yeah, as time went on, yes, yes.

16 Q. Then turning to the crew of E352, that's Clarke,
17 Bennett, Mason and Mechen, can you recall what tasks you
18 gave them initially?

19 A. Initially, yeah, I -- as is good practice, my first
20 thought was to send the crew manager, because this is
21 how -- how I implement my arrival tactics --

22 THE CORONER: Sorry, could you just repeat that?

23 A. Yeah, sorry. My methodology on arrival at an incident,
24 which is borne out of my understanding of good practice,
25 is to send a crew manager to the other side of the

1 building to see what the situation is on the other side.
2 To my knowledge, at that stage no-one had been to the
3 other side of -- no-one from the Fire Brigade had been
4 on the east side to see what the situation was, so my
5 first thought was to send Crew Manager Clarke round
6 there to -- to give me an impression of what -- whether
7 there was any fire that side, you know, whether people
8 were on the balconies asking for help, you know, just
9 a general idea of what was going on, and that would have
10 obviously informed my next plan of action. What I did
11 was --

12 THE CORONER: Sorry, could you just stop there for a moment,
13 because Mr Maxwell-Scott is just taking it step by step.

14 A. Sorry, yes.

15 MR MAXWELL-SCOTT: Did he then go and do that on the east
16 side of the building?

17 A. Yes, he went over there, and I also briefed him to
18 implement a cordon on that side.

19 Q. When he had done it, did he report to you in some way?

20 A. Yes.

21 Q. Did he report to you face to face or over the radio?

22 A. No, he came face to face.

23 Q. What did he say?

24 A. I can't remember the specifics he said, but my
25 impression is that we didn't have to resource that side

1 of the incident, that there were a lot of people there,
2 and I recall that he said he'd been given lots of
3 information, and he had -- he'd retained some of the
4 information in his head. He didn't give it to me
5 verbatim.

6 Q. What sort of information?

7 A. I think it was in relation to flat numbers, and people
8 who were unsure of friends or -- you know, people who
9 were in the -- there was no specific information from
10 what I remember.

11 Q. Just pausing there, his evidence also has been to the
12 effect that he gave some flat numbers to you. If that's
13 right, then you now have flat numbers coming to you from
14 more than one source, they're not just coming from
15 brigade control over the radio, you've also got them
16 coming at the scene; is that how it happened?

17 A. Yeah, there was flat numbers from everywhere, which is
18 why I needed support to try and capture those numbers.

19 Q. I won't take you to it, but your first statement refers
20 to flat numbers coming from the police from bystanders,
21 from the ambulance service from bystanders, from London
22 Fire Brigade personnel, appliance commanders who
23 intercepted messages when Firefighter Mullins was on
24 other duties and other LFB personnel. What system did
25 you then put in place for recording the flat numbers

1 that were coming at you from different directions?

2 A. I -- I don't remember making a -- a written note of it,
3 or if I did, I don't have that record now. What -- what
4 I did with the information that I had, I sort of passed
5 on as soon as I could to other people.

6 Q. What was the system for keeping in one place in
7 an accessible form the flat numbers that were coming to
8 you from all directions?

9 A. I -- I'm not really sure of the dynamics of when
10 Crew Manager Hider arrived, but that -- that was his
11 role, as I understood it, you know, that that's what he
12 carried on doing throughout my time as incident
13 commander, but in the early stages, I -- I did write
14 some numbers down, I think, but quite what I did with
15 them I'm not sure.

16 Q. You think you wrote some numbers down yourself --

17 A. Well --

18 Q. -- or you asked someone, or can you not say?

19 A. I'm not sure, to be honest.

20 Q. Just to assist you, Crew Manager Hider was on the
21 Brixton pump which reported in attendance at 16.41.

22 A. Yes.

23 Q. So what, if anything, was the system for keeping track
24 in an accessible form the flat numbers that were being
25 given to you before he arrived?

1 A. I don't really remember the specifics, but I do now
2 recall writing numbers down, but again I'm not sure
3 how -- how I kept that information ultimately. I did
4 instruct crew manager -- Firefighter Mullins to contact
5 control and get a list of definitive flats numbers that
6 we'd had contact from brigade control, and whether
7 I gave my piece of paper to him then, I don't know, but
8 I was completely swamped with information, I was writing
9 down what I could, I think. I don't recall the actual
10 dynamics.

11 Q. Do you attempt to evaluate the information --

12 A. Well, yeah --

13 Q. -- just pause there, if I could ask the question -- just
14 looking for the same number, or any patterns of numbers
15 that are close to each other, or anything like that?

16 A. Yes, what I was saying was that I remember the same
17 numbers kept recurring, and it was -- you know,
18 evidently they're the ones which we needed to give
19 greater priority.

20 Q. Are you able to say now which they were or which any of
21 them were?

22 A. Well, at the time, obviously 79 was known to me, there
23 were other prominent ones, but whether I remembered that
24 later on in the incident or it was at the time, I'm not
25 sure, but there were certain flat numbers which kept

1 recurring, and they were the ones that I retained in my
2 mind.

3 Q. It would be fair to say that 79 was one of them?

4 A. 79 was one of them, yeah.

5 Q. If we turn now to another radio message when you made
6 pumps six. This is at 395 in the advocates' bundle, the
7 top message being sent by E351 in the fourth line,
8 "Priority message", and then the sixth line:

9 "From Watch Manager Howling: make pumps six, over."

10 Pausing there, I assume you would have to have given
11 someone the order to go to the appliance and send that
12 message?

13 A. Yeah, that was firefighter -- that was
14 Firefighter Mullins.

15 Q. So the decision to make pumps six would have had to have
16 been made slightly before the time of that message?

17 A. Yeah, from what I gather it was a considerable time
18 before that -- well, you know, a few -- few minutes
19 before that. I would have been trying to get hold of
20 him on the radio, but obviously he was busy.

21 Q. Then if you see how the message continues, control says:

22 "Echo 351: we've got some information regarding
23 residents that are trapped in their flats. Flat 68,
24 6-8, caller is trapped in her sitting room, and in
25 flat 79, 7-9, they cannot open the front door to get out

1 of the property. Both flats smoke-logged, over."

2 Do you recall that message being passed to you?

3 A. Not specifically, but again the numbers are recurring.

4 I don't remember Mr Mullins coming to me with it

5 directly, but the numbers, yeah, I recognise the

6 numbers.

7 Q. Going back to the fact that you made pumps six, does it
8 automatically follow from you doing so that you know
9 that a station manager will be sent to take over from
10 you as incident commander?

11 A. Yes.

12 Q. Therefore there will come a time when you're going to
13 need to brief that new incident commander?

14 A. Yes.

15 Q. Can you explain why you made pumps six?

16 A. Yeah, I was looking -- all the resources we had were now
17 all fully committed and I was looking to implement
18 further search -- searching to -- to identify where the
19 flats were.

20 Q. Did you consider asking for more pumps, making pumps
21 eight, for example?

22 A. Not -- my first thought was to make six, make it six,
23 that was quite early on, it was just a delay, I think,
24 between me getting -- making the decision and then
25 getting hold of Mark Mullins to transmit the message.

1 Q. You have at the time four pumps and an aerial ladder
2 platform, so making pumps six, is that going to get you
3 one or two more appliances?

4 A. You get two more pumping appliances, generally.

5 Q. So that would then, once the order is acted upon, give
6 you six pumping appliances and the aerial ladder
7 platform you already had?

8 A. Yes.

9 Q. Did you consider asking for more aerial ladder
10 platforms, given the height of the fire within the
11 building?

12 A. No, not at that stage, because I'd already had
13 a consultation with Crew Manager Sharpe and he said that
14 it's unlikely to be of much use in the access road and,
15 from what I could see on approach to the -- from the
16 east side, was that there was not really any access to
17 get an appliance to the east side either. So there was
18 little space to pitch an ALP or an aerial appliance.

19 Q. I'm now going to ask you about the fact of fire
20 spreading up to the 11th floor. Do you remember when
21 you first saw that?

22 A. Yeah, I was standing outside.

23 Q. When you first saw that?

24 A. Sorry, when?

25 Q. Yes, particularly in relation to when you made pumps

1 six. What I was wondering was whether making pumps six
2 might have been a reaction to seeing it and just wanted
3 you to comment on that.

4 A. I don't recall it being in response to that. It might
5 have been, but probably the two things coincided, but --

6 Q. Just looking at what you said in your first witness
7 statement on this. If you turn in it to 278.

8 A. Yes.

9 Q. In the middle of the page, your recollection then
10 shortly after the incident was:

11 "Having already assessed the need for additional
12 resources, I made pumps six. Shortly afterwards, I saw
13 fire spreading upwards from the 9th floor to involve the
14 10th and 11th floors. It appeared to me that the fire
15 spread was from the 9th floor window due to the Coanda
16 effect. This is when a fire spreads by leaping outside
17 the building from one open window to another breaking
18 the windows in a flat above and igniting curtains."

19 So your recollection at the time was that you'd
20 already decided to make pumps six before you saw it?

21 A. Yes.

22 Q. The court has seen some video footage taken by
23 a resident, Mr Udi, whose witness statement said that he
24 believed he started to film on his mobile phone at
25 16.34, and that just under a minute and a half later

1 someone can be heard on the footage saying, "11th floor
2 now". If that is so, then the spread to the 11th floor
3 was at about 16.35, but I think your evidence is you'd
4 already made the decision to make pumps six before then,
5 because the message was sent later than the decision, is
6 that right?

7 A. Yes, yeah, that's right, and again I can't comment on
8 whether -- you know, I needed additional resources, how
9 that coincided with the spread of the fire I can't
10 recall now.

11 Q. If I then ask you to look in your witness statement, the
12 same one, at 283. This is the paragraph that begins,
13 "During my career". Just to refresh your memory, this
14 is the one substantial paragraph that was in this
15 witness statement that was not in your typed notes that
16 you prepared on your own a couple of days earlier. What
17 you said was, in the second sentence:

18 "The apparent speed of fire spread internally from
19 the original compartment was exceptional. My previous
20 knowledge and experience gave me the understanding that
21 a fire in a flat would be expected to be confined for up
22 to an hour rather than the short timeframe I witnessed."

23 Was that your thought process on the afternoon of
24 the incident?

25 A. Yes. My previous experience -- as I said there, a flat

1 fire would normally be confined, certainly internally.
2 They're designed to be withstanding the effects of the
3 fire for an hour or so.

4 Q. Can you assist us at all with why that paragraph was in
5 this statement but not in the typed notes from a couple
6 of days before?

7 A. Obviously I just -- I just felt the need to emphasise
8 the -- you know, the dynamic nature of the fire at that
9 time.

10 Q. What did you mean by "fire spread internally", because
11 previously I thought you'd been talking about fire
12 spread externally through the Coanda effect.

13 A. Yes, I think my recollection was sort of coloured by the
14 accounts of other crews that were in -- that had been in
15 there, and they said how quickly it had spread up, you
16 know, upstairs and beyond the compartment.

17 Q. What did you mean by, "the compartment"?

18 A. Well, the flat. I mean, as I understood it, there
19 was -- the fact that smoke-logging was internal and into
20 the corridor and the lobby area, which forced the
21 movement of the --

22 Q. Just pause a minute, this isn't about smoke spread, it's
23 about fire spread.

24 A. Yes.

25 Q. The compartment is the flat, is it?

1 A. That's what -- yeah, that's what I meant by that, yes.

2 Q. The point is, is it not, that the spread of fire from
3 one compartment to another, from one flat to another, is
4 a significant development?

5 A. Yes, but at the time -- other than obviously the smoke
6 being evident in -- in the stairwell, I wasn't aware
7 that there was actually fire spread from the compartment
8 internally, you know, into the corridor, but
9 subsequently I heard that and obviously that's why I put
10 it into the -- that second statement.

11 Q. There came a point when you saw a fire on the 11th,
12 didn't there?

13 A. Yes.

14 Q. At that time, you must have regarded that as spread from
15 one compartment to another, mustn't you?

16 A. Yeah, but I took it that it was externally -- externally
17 spreading there.

18 Q. Before it spread to the 11th floor, it, as a matter of
19 logic, had previously spread to the 10th floor, hadn't
20 it?

21 A. Yes.

22 Q. At that point it spread to the 10th floor, would I be
23 right in thinking that you were still of the view that
24 these were not maisonettes?

25 A. No, I'm not sure -- I was, I think I was aware they were

1 maisonettes.

2 Q. Well, I thought your evidence earlier was that you were
3 aware they were maisonettes when somebody asked for
4 an extension ladder.

5 A. Yes, yes.

6 Q. They asked for an extension ladder because the upper
7 floor of the flat was on fire.

8 A. Yes.

9 Q. What I'm suggesting is that, from where you were
10 standing, you would have seen that 10th floor on fire
11 before anybody asked you for extension ladders?

12 A. Yes, that's correct, yeah.

13 Q. At the time you saw it on fire, your thought processes
14 would have been "The fire has already spread to another
15 compartment", because the 10th floor is another
16 compartment in your mind at that time.

17 A. Well yes, certainly, yeah, because it's gone from the
18 9th to the 11th.

19 Q. No, the 9th to the 10th. Unless you know they're
20 maisonettes, fire in the 10th floor represents a spread
21 into a new compartment, doesn't it?

22 A. Yes.

23 Q. Can we have a look at the high rise firefighting policy
24 on this topic at page 1523 in tab 19 of the jury bundle.
25 It's perhaps helpful to start on the previous page,

1 1522. The section is "Firefighting considerations".

2 The two I want to draw your attention to are 5.5

3 "Vertical fire spread", and 5.4, "Building design and

4 fire safety measures". 5.5 says that:

5 "Vertical fire spread may travel internally but more
6 commonly occurs externally."

7 It refers to the Coanda effect which you mentioned.

8 Then the bullet point underneath says:

9 "Assess resource requirements, consider evacuation
10 and carry out firefighting rescue on upper floors."

11 Then 5.4 says:

12 "Building design and fire safety measures. The
13 risks posed by the premises and its contents when
14 involved in fire can significantly increase should any
15 of the measures designed into the building be
16 compromised. This can include the loss of
17 compartmentation."

18 So the point I'm asking you about is this policy
19 identifies vertical fire spread internally and the
20 compromise, or loss of compartmentation as recognised
21 firefighting considerations in high rise firefighting,
22 does it not?

23 A. Yes.

24 Q. They represent significant developments?

25 A. Yes.

1 Q. Under the decision making model, they require to be
2 assessed and evaluated?

3 A. Certainly.

4 Q. That valuation might lead to a change in priorities,
5 they might need to, might they not?

6 A. Yes, I mean it would, yes, but I was -- my first
7 priority was to identify where the flats were with
8 a view to carrying out rescue. We do take risks to save
9 a saveable life.

10 Q. Finding out whether there was anyone still in a flat on
11 the 11th floor, to which fire was visibly spreading,
12 would be a high priority, wouldn't it?

13 A. Yes.

14 Q. Finding out whether one of the flat numbers that you had
15 been given was a flat immediately above the flat where
16 the fire has started would be a high priority, wouldn't
17 it?

18 A. Yes.

19 Q. In fact what, if anything, would be a higher priority?

20 A. I would say -- well, the person -- the -- sorry, could
21 you repeat the two options?

22 Q. What, if anything, would be a higher priority than
23 finding out whether one of the flat numbers you'd been
24 given on your list was a flat immediately above the flat
25 in which the fire had started?

1 A. That was the high priority, yeah.

2 Q. Would there have been any other higher priority at that
3 time, when you see the fire spreading to the 11th floor?

4 A. Well obviously getting the resources up there to -- to
5 fight the fire, that would be a priority as well.
6 Equally -- well, the -- the rescue of the person would
7 come foremost.

8 Q. What steps were taken once you saw the fire spread to
9 the 11th floor to find out whether one of the flat
10 numbers that you had been given was the flat to which
11 the fire was visibly spreading?

12 A. That's where I committed Crew Manager Clarke to go.

13 Q. Just before I come to that, a couple of questions: did
14 you consider making persons reported at that time?

15 A. No.

16 Q. Can you say why not?

17 A. It didn't occur to me. The -- my understanding of it
18 was that the -- I had the resources there which would --
19 which would have been mobilised if I sent persons
20 reported anyway, so it wasn't really at the forefront of
21 my attention. That, coupled with the fact that there
22 was -- early on I would have made persons reported early
23 on, if someone had been in the flat that was on fire at
24 the time.

25 Q. Did you consider ordering a partial evacuation starting

1 with the north corridor of the building where the fire
2 had started, and including the north corridor of the
3 floor above? I'll show you a diagram if that helps.

4 A. No, I understand where you're talking about. I --
5 I didn't have the resources to implement that at the
6 time, it --

7 Q. Did you consider doing that?

8 A. It would have been a consideration, yeah, but everything
9 was moving so quickly there was little time to think.

10 Q. We are now going to come to the task that you gave
11 Crew Manager Clarke. Can you tell us what that was?

12 A. Yeah, it was quite an involved brief, initially,
13 actually. I wanted him to go and find out where the
14 fire was -- or where the flats that we had information
15 about were in relation to where the fire was. He was to
16 get above the fire, 'cos that's where -- I suspected
17 that's where -- you know, to the best of my knowledge,
18 that's where the -- the flat would be, and if it was
19 safe for him to do so, to evacuate the people in that
20 area.

21 Q. If I just take you to what you said in your witness
22 statement a few days after the incident and then ask you
23 about this. This is 278 in the statements bundle. In
24 the third paragraph that starts, "Crew Manager Clarke
25 reported to me", it refers to the cordon and then says:

1 "Once this was done, I radioed through the list of
2 flat numbers I had at that time and instructed him
3 [Crew Manager Clarke] to lead the pumps crew in BA to
4 check those flats as a matter of priority and to check
5 the conditions above the fire floor."
6 A. Yeah, that's correct, yeah.
7 Q. I just need to ask you whether you are confident that
8 the task to him did include specific numbered flats, or
9 whether it might more generally have been to search and
10 check above the fire floor?
11 A. My recollection is that he did have specific numbers.
12 Q. Do you know how many, can you remember?
13 A. No.
14 Q. Do you remember which flat numbers?
15 A. No, this was early on, what I remember -- obviously 79
16 would have been one of those numbers.
17 Q. 79 would have been one?
18 A. Well, as far as I remember.
19 Q. Okay. How did you expect him to go about that task?
20 A. Well, as soon as possible, I mean it was -- it was clear
21 they were keen to go, my recollection is that, you know,
22 I gave him the information that I had and off they went.
23 Q. Did you send any instructions directly to the officer in
24 charge of the bridgehead, Crew Manager Dennis, about
25 what you wanted crews that he committed to do?

1 A. No.

2 Q. Crew Manager Clarke's evidence was to the effect that
3 when he got up to the bridgehead he started doing
4 different tasks, and evacuated residents on both the
5 north and south corridors of the 9th floor.

6 A. Yes.

7 Q. Did you know that at the time?

8 A. No.

9 Q. So for example Crew Manager Dennis, to your
10 recollection, didn't pass that news on to you?

11 A. I don't remember getting that information and, as
12 I said, Crew Manager Willett was in contact with
13 Crew Manager Dennis on the handheld radio. I don't
14 recall that information coming directly to me.

15 Q. If you take up the jury bundle at tab 11. That's
16 a representation of what the western side of
17 Lakanal House looks like with the flat numbers and the
18 floor numbers shown. We heard evidence for example from
19 Firefighter Bennett that his task was to evacuate all
20 the flats on the 9th floor, which we would now know to
21 be numbers 57 to 70. At that time, what would you have
22 regarded as higher priority for evacuation, flats 57 to
23 64 on the south corridor or flats 79 to 84 on the north
24 corridor?

25 A. I would have expected the -- the upper ones to be the

1 priority.

2 Q. 79 to 84 would be higher priority?

3 A. Yes.

4 Q. Can I then move on to the arrival of command unit 4,
5 which according to the sequence of events was at 16.48.

6 Did you have experience of working with command units
7 before this?

8 A. Yes.

9 Q. Did an initial discussion take place with Watch Manager
10 Best from the unit?

11 A. We had a conversation. I was extremely busy at the
12 time, trying to collate all the information that I'd
13 been given. I seem to remember Crew Manager Hider was
14 there at that time, and there were various other people
15 standing around me.

16 But what I did find was most unhelpful, because this
17 is how I remember it, he came to me with -- I think it
18 was a wad of information, some aide memoires and things
19 which I should be using to refer to and to run
20 an incident, and it was so dynamic at the time it was
21 a complete distraction for me.

22 Q. I think you talked about that in your second witness
23 statement, when you said you recalled him giving you
24 a long aide memoire regarding generic incident command,
25 which you did not feel was of use and was a distraction?

1 A. Yes.

2 Q. So in other words he was giving you written documents to
3 look at, or something else?

4 A. Yes, yes, it was written documents, and again, you know,
5 I was trying to collate information, you know, trying
6 to -- trying to process information, and that was
7 a distraction.

8 Q. The command unit would have in it some useful pieces of
9 equipment, wouldn't it, because it's in effect a mobile
10 office, with whiteboards, pens and paper and telephones
11 and the like, is that right?

12 A. Yes.

13 Q. It also comes with two experienced firefighters of watch
14 manager rank?

15 A. Yes.

16 Q. So even though, as you say, the documentation that
17 Watch Manager Best gave you was not helpful, its arrival
18 still provided you with some additional resources?

19 A. Yes, what I remember of the conversation, which isn't
20 an awful lot now, was that they were not ready to set up
21 at that stage, which would mean that they were employed
22 in -- in the process of setting the command unit up,
23 which takes a few minutes.

24 Q. If you have the sequence of events to hand on page 5, at
25 16.44. It will be in the jury bundle at tab 12.

1 16.44.40, this is, we understand, a telephone call
2 from brigade control to CU4, so you would only know
3 about it if someone came over and told you about it, and
4 the call was to the effect that the occupants of flat 68
5 and 79 were still on the line and both very distressed
6 and not able to get to their front doors. I can show
7 you a transcript of the call if necessary, but it may
8 not be. Do you remember that information being passed
9 to you?

10 A. Well, it's a repetition of what I was told earlier,
11 isn't it?

12 Q. It's probably best if we do look at it. It's at 344 in
13 the advocates' bundle. As I've said, this is in no way
14 a conversation that you could have overheard, you would
15 only know about it if you were told about it. It's 68
16 and 79 again, a lot of smoke in both flats. Then three
17 quarters of the way down:

18 "... they reckon they're unable to get down to their
19 front doors and there's going to need to be a forced
20 entry."

21 So did you know about 68 and 79 already, but the
22 evidence you've given so far suggested that you didn't
23 remember knowing that either of them was trapped, and so
24 this suggests, perhaps, that they are trapped, and
25 I wondered whether you knew about this message.

1 A. I do recall some information coming from the command
2 unit. I can't remember which officer it was, and again
3 it was a repetition and it was -- part of my objectives
4 was to resource that at that stage. I was waiting for
5 additional resources to come along.

6 Q. Then if I ask you to look at a message that you asked to
7 be sent, this is at 397 in the same bundle. It's the
8 top message at 16.45.05:

9 "Residential block of 12 floors, 20 metres times
10 60 metres, 10 per cent of 9th, 10th, 11th and 12th floor
11 alight."

12 Just to clarify a point that the message does
13 include the 12th floor, do you see at 16.46.16, the
14 operator reads the message back, and doesn't mention the
15 12th floor being alight --

16 A. Yes.

17 Q. -- but then further down in the same message, four lines
18 from the bottom, E351, having had it read back, said:

19 "Message should also read 10 per cent of 12th floor
20 alight."

21 The operator says:

22 "Could you confirm, 10 per cent of 12th floor alight
23 and BA in use, over."

24 E351 says:

25 "That is correct, over."

1 A. Yeah.

2 Q. So is it right that at that time you asked for the
3 message to be sent:
4 "10 per cent of 9th, 10th, 11th and 12th floors
5 alight."
6 A. Yes, at a later stage I realised that I'd overestimated
7 the size. My perception at the time was that the 12th
8 floor was alight, but at this stage it wasn't, as
9 I understand it now.

10 Q. That was your impression at the time?

11 A. Yeah, due to basically the smoke, it looked like there
12 was smoke coming out at the top as well.

13 Q. If I could ask you to look in the sequence of events,
14 you probably have two versions in your tab 12. One has
15 colour photos in it. If I just find some photographs of
16 around this time. This is 16.42.12 on page 11 of the
17 one with coloured photos. The photo is on the screen.

18 THE CORONER: Mr Howling, you can look at the photo on the
19 screen if it's easier.

20 A. Sorry, yes.

21 MR MAXWELL-SCOTT: That's 16.42.12, which is two to three
22 minutes before your message was sent. I'll show you one
23 at 16.46.11, and then I'll show you one at 16.47.35.
24 I don't know if that helps you to say whether the
25 message that you sent at the time, giving the impression

1 that the 12th floor was alight in addition to the 9th,
2 10th and 11th, was accurate or not.

3 A. Again, my perception was that due to smoke travel, that
4 the 12th floor was alight at that time. Yeah, I --
5 I don't -- I don't understand what you're asking.

6 Q. I pointed out that when the message was sent, the sender
7 was careful to make sure the operator understood that
8 the message related to the 12th floor as well as the
9 9th, 10th and 11th, I'm just pointing that out to you.
10 You said that you didn't think that the message was
11 correct, although it was your impression at the time
12 that the 12th floor was alight?

13 A. It was my impression at the time. I think I was asked
14 this question on my second interview, and that's where
15 my doubt has come from since. Again, it's three and
16 a half years ago, I can't recall exactly what -- why
17 I said 12th, 12th floor alight.

18 Q. That was your impression at the time --

19 A. Yes, I mean --

20 Q. Sorry, let me just ask the question. If at that time
21 you were still unaware that the building had maisonettes
22 in it, then the implication of your message was that
23 four flats were on fire, do you agree?

24 A. Yeah, potentially, yes.

25 Q. If that was so, it would mean that the fire had spread

1 from the original compartment into three others?

2 A. Yes.

3 Q. If you did know that they were maisonettes, then we're
4 talking about two flats on fire and spread from one
5 compartment to another?

6 A. Yes.

7 Q. Could you just explain to the members of the jury what
8 the purpose of a message like the one sent at 16.45 is?

9 A. It's an informative message which is designed to inform
10 senior officers and brigade control of the nature of the
11 incident in terms of what is alight -- the dimensions of
12 the building, what is alight and what is in use.

13 Q. Does it have a special status?

14 A. It's not -- it's not an assistance message, it's
15 a routine message, we have to send it, you know, at
16 regular intervals, but it's not a priority message.

17 Q. Just going back to what was said in the middle of the
18 radio message we'd been looking at, 16.46.16, control
19 was now telling E351 about flat 57, do you see --

20 A. Yes.

21 Q. -- on the 9th floor level?

22 A. Yes.

23 Q. "There's a young baby inside the flat with persons ...
24 they're upstairs in the flat."

25 A. Yes.

1 Q. If, in fact, you didn't know at that point, you got
2 information there to tell you that flats are on two
3 levels?

4 A. Yes.

5 Q. If it was passed you in that form?

6 A. Yes, if it was passed to me verbatim, yes.

7 Q. Madam, I notice the time.

8 A. Yes.

9 Q. That's probably a convenient moment for a break?

10 THE CORONER: All right, thank you, yes. We do need to
11 leave enough time this afternoon for others to put their
12 questions. All right, we'll have a break now and
13 continue at 2 o'clock. Thank you very much, members of
14 the jury, if you would go with Mr Graham.

15 (In the absence of the Jury)

16 THE CORONER: Mr Howling, you remember what I said to you,
17 please, during this break, don't discuss the evidence or
18 the case with anyone.

19 A. Yes, madam.

20 THE CORONER: So the safest option is to have lunch by
21 yourself.

22 (1.04 pm)

23 (The short adjournment)

24 (2.00 pm)

25 THE CORONER: Thank you, do sit down. Could we have the

1 jury in, please.

2 Yes, Mr Howling, do top up your water if you want.

3 A. Thank you.

4 (In the presence of the Jury)

5 THE CORONER: Yes, thank you.

6 MR MAXWELL-SCOTT: Good afternoon, Mr Howling. Following
7 through the events whilst you were incident commander,
8 and coming towards the end of your time as incident
9 commander, and I'd reached the point where you made
10 pumps eight. We can refer to that simply by looking at
11 the sequence of events at page 6. This was at 16.49.
12 You will have given the instruction to someone to send
13 that message before that?

14 A. Yes, that's correct. Sorry, I haven't got the
15 appropriate page.

16 Q. You probably don't need to turn to it, I can tell you at
17 16.49 the radio message was sent to control that you
18 were sending the message:

19 "Make pumps eight."

20 Can you tell the jury why you made pumps eight at
21 that time?

22 A. My recollection of the incident at that time was that
23 I was in the middle of the briefing with
24 Station Manager Cartwright and the command unit was
25 there. I think I'd finished the briefing as far as

1 I could, and I remember the command unit, the officer
2 telling me:

3 "That will be your last message."

4 So that's -- that's as I recall it happening.
5 The -- the number of resources I would have already
6 discussed with Station Manager Cartwright, and the
7 increased attendance was just to augment the additional
8 attendance. I later found out that I had already had
9 eight appliances in attendance.

10 Q. Are you confident that Station Manager Cartwright was
11 there when you took that decision?

12 A. From my best recollection he was. Simply because --
13 sorry, simply because I remember the command officer
14 saying to me:

15 "We'll make that your last message."

16 Q. I want to show you two photographs about the fire
17 spreading lower down the building, 16.48 and 16.49.
18 This is the photograph at 16.48. You can see fire on
19 the 5th floor.

20 A. Yes.

21 Q. Then a minute later at 16.49, a ground jet has already
22 been set up and directed at the 5th floor?

23 A. Yes.

24 Q. I think that that was set up by Crew Manager Sharpe and
25 Firefighter Taylor --

1 A. Yes.

2 Q. -- with Crew Manager Willett assisting to lay out some
3 hose?

4 A. Possibly, I'm not sure about Mr Willett but the other
5 two definitely.

6 Q. We don't have a photo of this before 16.48, but given
7 that the jet is in operation by 16.49, can you help us
8 at all with when the fire on the 5th floor is likely to
9 have started, allowing enough time, firstly for you to
10 notice it and secondly to get people to fight it?

11 A. First of all, we saw debris coming down and starting the
12 fire, so as soon as it started, we knew there was a fire
13 there and we knew we had to take action. The resources
14 were there to do it: Crew Manager Sharpe and Firefighter
15 Taylor were nearby. Crew Manager Sharpe had the role of
16 safety officer, looking after the cordon action, so he
17 was right there at the base of the -- below that flat.
18 Firefighter Sharpe -- sorry, Firefighter Taylor was also
19 nearby.

20 Q. What was he doing before this?

21 A. I'm not sure to be honest with you, but he was in the
22 vicinity, and they -- they were there to -- to set that
23 up. So the fire -- we saw the fire start and so that's
24 why the resources were there immediately. So it could
25 only have been within the -- that one minute before,

1 I would say.

2 Q. Could this have been the reason why you asked for pumps
3 eight or do you think this was separate to that?

4 A. No, to be honest, I'd already made my decision that we'd
5 need more appliances. The message, you know, was clear
6 in my mind, I'd need more. Initially, it was going to
7 be in eight, but in hindsight obviously, I should have
8 made -- increased the number, yeah.

9 Q. Earlier?

10 A. Well, with that message.

11 Q. Sorry, you think in hindsight you should have made more
12 than eight at that time?

13 A. Yes, as I say, my recollection is that I discussed it
14 with Station Manager Cartwright and the command unit and
15 they were happy with that message.

16 Q. What was your reaction at the time when you saw fires
17 starting below the original fire floor, so on floors 5
18 and also 7?

19 A. Well, just to step back, we haven't mentioned the fact
20 that we'd deployed crew manager -- Watch Manager Payton
21 up there to oversee the bridgehead and --

22 Q. Just to be clear, is this an example of where you think
23 I'm asking you questions in the wrong order; you think
24 he'd already been deployed before this?

25 A. Yes, yes. Before the fire started, Watch Manager Payton

1 went in, I'm sure.

2 Q. That's very helpful, I'll come to that bit, but can you
3 just finish off the point about your reaction when you
4 first saw the fires start on the 5th and 7th floors?

5 A. Yes, well obviously it's unprecedented in my experience
6 for a -- for a fire to spread vertically downwards and,
7 in terms of implications, it had serious implications,
8 because we aren't supposed to be working above the fire
9 floor, our bridgehead should be two floors below the --

10 Q. That is standard operational policy?

11 A. Yes, yeah. The bridgehead is set up in close air --
12 sorry, in fresh air, so that the breathing apparatus
13 crews can start in fresh air and then be deployed into
14 the fire sector, if you like. Obviously, with fire and
15 smoke now below them, that compromised the bridgehead
16 completely.

17 Q. I fully understand that. You told the jury today that
18 the fire spreading downwards was unprecedented and you
19 said very much the same in your first statement. You
20 said you'd never witnessed a situation like it, with
21 fire spreading downwards. In your second witness
22 statement you described it as a unique situation.

23 Just thinking about the mechanism, what was
24 happening here was burning debris falling and then
25 catching on things at a lower level, wasn't it?

1 A. Yes.

2 Q. You'd seen burning debris falling before this, on this
3 day?

4 A. As I said when I first arrived I didn't really notice
5 burning debris, but, yeah, it was apparent that there
6 was burning debris coming down.

7 Q. Had you noted the presence of netting and pigeon spikes?

8 A. No, I hadn't, no, it wasn't at the forefront of my
9 consciousness.

10 Q. Mr Willett's evidence was that most high rise blocks on
11 the station's ground had netting and pigeon spikes, it
12 was an every day occurrence; can you comment on that?

13 A. I'm not denying that they're here, it's just -- you
14 know, it wasn't a thing that I considered when I was
15 trying to rescue people, deploy resources to rescue
16 people.

17 Q. All I need to ask you to finish off the point is whether
18 there was an opportunity to recognise a risk that
19 falling debris might start fires at lower levels?

20 A. There's obviously always a risk of burning debris coming
21 down, I didn't -- you know, I could not anticipate the
22 fact that there would -- that it would go into the flats
23 below, I've never known that.

24 Q. I'm going to ask you now about Watch Manager Payton,
25 whom you've already told the jury you think had been

1 briefed before those fires started on lower levels.

2 A. Yes.

3 Q. It's probably easiest to take you to your first
4 statement at page 278 in the statements bundle.

5 A. Yes.

6 Q. The final paragraph says:

7 "Watch Manager Payton arrived. I briefed him and
8 detailed him to go to take over the bridgehead and
9 report the situation and resource requirements to me.
10 Part of his role was also to coordinate the search being
11 undertaken by Crew Manager Clarke and E352's crew. He
12 [Watch Manager Payton] was given a list of flats
13 recorded by Firefighter Mullins for action."

14 A. Yes.

15 Q. That's your recollection?

16 A. Yes.

17 Q. Did you personally give him any verbal briefing beyond
18 what is said there?

19 A. Well, obviously I -- I gave him the briefing in as much
20 detail as I could. I emphasised that the flats that we
21 had information about, certainly the ones from
22 Firefighter Mullins, were the ones of highest priority.

23 Q. Was anything said about which numbers on the list were
24 of the greatest priority, in other words if there were,
25 for example, five on the list, that there was one that

1 stood out?

2 A. As I understand it, I didn't actually see what was
3 written on the list that Mullins gave him but, as
4 I understand it, certain -- it was annotated, it was
5 annotated with "persons trapped".

6 Q. You understood it was annotated with "persons trapped"?

7 A. I think that's what Firefighter Mullins wrote on it but,
8 again, I didn't see the list so I can't say for certain.

9 Q. Why do you think that's what was written on it?

10 A. From -- from hearing from Firefighter Mullins.

11 Q. At the time of his evidence here to this court?

12 A. Yeah, subsequently, yeah.

13 Q. Just to be clear about this, you don't know one way or
14 the other what was said?

15 A. No.

16 Q. Did you tell Watch Manager Payton that the caller in
17 flat 79 was trapped?

18 A. I can't remember specifically saying it, but obviously
19 I emphasised the flat -- the fact that those flats were
20 of the highest priority.

21 Q. Did you have any discussion with him about where the
22 flats were in the building, particularly where flat 79
23 was?

24 A. Only that it was above the fire floor, and that
25 Crew Manager Clarke had been dispatched to check it out,

1 basically, check that area out.

2 Q. Did you have any discussion with him about whether
3 flat 79 might be near an area which was visibly on fire?

4 A. I don't recall specifically saying that, I may have
5 pointed up to the building and said, you know, it's
6 around about that area. I don't recall specifically,
7 no.

8 Q. If I could just take to you a passage in your second
9 witness statement at page 294 in the statements bundle.
10 It's the final question and answer. The question is:

11 "Did you receive information from control that any
12 particular occupiers were in danger from the fire?"

13 You said:

14 "No, I do not recall receiving specific information
15 that a particular occupier was in danger from fire. If
16 I did, I would have acted on it. I recall that some
17 information was that some people were having difficulty
18 breathing, but I do not recall the numbers of those
19 flats."

20 A. Yes, that's -- that's my best recollection at the time,
21 you know. That was at the end of a long interview
22 session with lots of questions of similar vein, and
23 I just -- that was my best recollection at the time.

24 Q. Looking back on it now, is that your view, that you
25 didn't receive information from control that any

1 occupiers were in danger from the fire?

2 A. I don't recall specifically -- no, I don't recall it
3 being fire, no, I don't. I don't recall. Persons
4 trapped, yes, but the danger of the fire, I cannot again
5 hand on heart say that I -- I remember that, I don't
6 remember the fire specifically.

7 Q. If one thinks about the smoke that's associated with
8 fire, did you at the time think there were people in the
9 building who were in grave danger from fire and smoke?

10 A. Well, obviously, yeah, I mean the fire spread was -- was
11 quite -- quite rapid, and, you know, we -- we -- it was
12 apparent that those around the fire area would be in
13 grave danger. Consequently Watch Manager Payton was
14 dispatched to look after the bridgehead and get -- get
15 some resources up there to conduct a search and get
16 people out.

17 Q. If I just take you to your first statement at 279. At
18 the very bottom, 279, your first statement said that
19 Watch Manager Payton informed you by radio that
20 an additional four BA crews would be required at the
21 bridgehead:

22 "In response to this my plan was to allocate BA
23 crews from E331, E381, H242 and H222 to him to fight the
24 fires above the bridgehead and to instigate a search
25 sector with the already identified flats to be located

1 as matter of priority. However, the fire spread to the
2 5th and 7th floors made the bridgehead position on the
3 7th floor untenable."

4 Is that how you recall it --

5 A. Yes.

6 Q. -- that there was a plan to send in significant more
7 resources, but the need to lower the bridgehead in
8 accordance with standard operating procedures prevented
9 that from happening?

10 A. That's right, sir, yeah.

11 Q. If I then ask you, thinking about the end of your time
12 as incident commander, about whether, as at that time,
13 you had gained knowledge of certain features of
14 Lakanal House whilst incident commander. So firstly, by
15 the time you stopped being incident commander, were you
16 aware that on the even-numbered floors there were no
17 central corridors?

18 A. No.

19 Q. Were you aware that the flats were maisonettes?

20 A. Yes, to my -- the best of my knowledge, yes, I think
21 I was.

22 Q. That's consistent with what you said earlier today about
23 hearing about the need for an extension ladder.

24 A. Yes.

25 Q. Were you aware that the upper floors of the flats

1 extended the full width of the building and therefore
2 had windows on both the east side and the west side?

3 A. No.

4 Q. Were you aware of the existence of an escape route from
5 balconies to the central staircase and from there to
6 ground floor level?

7 A. No.

8 Q. I'll show you a photograph of the balconies from the
9 outside. That's a view of Lakanal House from the corner
10 of Dalwood Street and Sedgmoor Place. It's the west
11 side. It's not identical to the view that you had,
12 because you were more front on to the building, but
13 you'll recognise the balconies at alternate floor level?

14 A. Yes.

15 Q. Did you have a view at the time on what they were?

16 A. Obviously I could see that some of the building was set
17 back. I couldn't really see what -- no, in terms of the
18 internal construction, et cetera, I couldn't --
19 I couldn't see if you could go the whole length, you
20 know, it wasn't something I was aware of.

21 Q. This is a photograph I'm going to show you know, 45.
22 Taken from the same angle but zoomed in, you see a white
23 door at the end of the balcony?

24 A. Yeah, I can see that, yeah.

25 Q. From that photo, it is clear, isn't it, that there's

1 nothing at upper body height to prevent one from walking
2 the length of the balcony?

3 A. Yeah, that's true. I mean I could not see that that was
4 a door from where I was, I wasn't aware that there were
5 doors going into there.

6 Q. Because you had a straight on view?

7 A. Yeah, yeah, I didn't know there was a door there.

8 Q. But anyone standing here, would you agree, could see the
9 door and could see the balcony?

10 A. I wouldn't like to comment. I'm not sure. It depends
11 how good their eyesight is, I should think.

12 Q. Let's deal with it in this way: did anybody at any time
13 when you were incident commander draw your attention to
14 the balconies and in particular the door at the end of
15 the balcony?

16 A. No.

17 Q. I'm going to show you now an image of the outside of
18 Lakanal House. This is a representation of what it
19 looks like. I imagine this is very much the view you
20 had?

21 A. That's fair to say, yes.

22 Q. Obviously you wouldn't have had the benefit of the floor
23 numbers which we see on this diagram. If I now
24 superimpose on that the flat numbers and ask you this:
25 at the time when you ceased being incident commander, to

1 what extent had you built up a mental picture like that
2 of where flat numbers were?

3 A. I -- I didn't have an overall impression of where the
4 flats were, you know, in terms of the -- the
5 configuration and which -- which level was which,
6 looking at it from the outside.

7 Q. Then returning to the chronology concisely,
8 Station Manager Cartwright came and took over from you,
9 and we see the message at 16.55 that he was now the
10 incident commander --

11 A. (The witness nodded)

12 Q. -- and Group Manager Freeman arrived on the scene at
13 16.57. In your second witness statement, you commented
14 on the briefing you sought to give Station Manager
15 Cartwright. This is in page 286 of the statements
16 bundle.

17 A. Yes.

18 Q. You refer to the fact that in your previous statement
19 you said you attempted to give a brief based on the
20 decision making model to Station Manager Cartwright. At
21 the time you had Crew Manager Hider and
22 Firefighter Mullins gathering information:

23 "I did not yet have all the information that they
24 had and still had to establish in my mind where the flat
25 numbers were in relation to the fire."

1 A. That's true, certainly of some of the flat numbers, yes.

2 Q. You say that's true in the case of some of the flat
3 numbers?

4 A. Well, I suspect the that 79 was -- as I said earlier on,
5 I suspected that flat 79 was in close proximity to the
6 fire.

7 Q. The decision to move the bridgehead down, was that
8 formally taken by you or by Station Manager Cartwright?

9 A. I don't know who took the decision, it wasn't me though.

10 Q. Then if I might just summarise on the basis of your
11 first witness statement what you did after you were
12 incident commander -- and I mean absolutely no
13 disrespect to you by dealing with it very briefly in
14 this way -- I recognise that you continued to fight fire
15 for several hours and carry out a number of tasks, but
16 our focus today is on your role as incident commander.

17 A. Yes.

18 Q. So in summary, Station Manager Cartwright was concerned
19 about falling debris, and you arranged for an inner
20 safety cordon and tasked Crew Manager Sharpe to be
21 a safety officer.

22 A. Yeah, this is a little bit prior to that, yeah.

23 Q. You responded to a commotion on the east side of the
24 building and saw a man on one of the top balconies in
25 distress?

1 A. That's correct.

2 Q. You reported what you had seen to Station Manager
3 Cartwright?

4 A. Yes.

5 Q. The Old Kent Road aerial ladder platform was deployed
6 and you personally helped to move cars so that it could
7 get as near to the building as possible?

8 A. That's correct, yes.

9 Q. You were then told that you had been made stage 2
10 breathing apparatus entry control officer, and reported
11 for duty to carry out that task on the east side of the
12 building?

13 A. That's correct.

14 Q. You were then present carrying out that role along with
15 Watch Manager Payton and Crew Manager Hider --

16 A. Yes, and --

17 Q. -- at the entry control point?

18 A. Yes, and Firefighter Bennett as well.

19 Q. When the bridgehead moved to the 3rd floor, you moved
20 with it and continued to carry out that task?

21 A. That's correct, yeah.

22 Q. You remained doing that until you were relieved from
23 duty at about 9 pm?

24 A. That's correct, yes.

25 Q. My final question is this: looking back over your

1 involvement on the day of the fire, and thinking
2 particularly about your time as incident commander, what
3 single additional thing do you think would have most
4 helped you to carry out the tasks that you had to carry
5 out?

6 A. What we needed was a robust procedure and equipment to
7 capture and relay information between the forward
8 command point, such as the bridgehead, and the incident
9 commander and the command unit as well.

10 THE CORONER: The what, sorry?

11 A. The command unit, so all senior officers could be --
12 could share the information, and that information, you
13 know, obviously would relate to all aspects of the
14 incident, but specifically things such as building
15 layout and flat numbers and, you know, persons reported
16 details.

17 Q. Thank you very much, those are my questions, but there
18 will be questions from others.

19 A. Thank you.

20 Questions by MR HENDY

21 MR HENDY: Mr Howling, my name's Hendy, I represent three of
22 the bereaved families.

23 Can I ask you first of all, please, to look at
24 page 283 of your statement?

25 A. Yes.

1 Q. You recall that most of this first statement that you
2 made to the police is in fact a reproduction of the note
3 which you'd written yourself at home a day or so after
4 the fire?

5 A. That's correct, yeah.

6 Q. Look at the top of page 283, you write:

7 "All requests for relief BA crews were actioned and
8 they arrived in good time, and an adequate number of
9 appropriately rigged safety crews were maintained
10 throughout."

11 Is that still your view?

12 A. Are we talking about later on in the -- in the incident,
13 when I wasn't -- when I wasn't incident commander, are
14 you asking me?

15 Q. No, I'm asking you about the words, "were maintained
16 throughout", from which I had understood that you were
17 saying that there was an adequate number of safety crews
18 at all times, is that not right?

19 A. No, that's not what I meant by that, apologies.

20 Q. Right. Can I ask you to please look at page 279.
21 Again, right at the top of the page, where you've
22 recorded:

23 "Burning debris was now falling and becoming trapped
24 in the window openings on lower floors. I saw this lead
25 to fires starting in flats on the 5th and 7th floors."

1 I appreciate I'm taking you out of chronological
2 sequence, but you saw burning debris being blown into
3 the windows and fires starting in consequence, did you
4 not?

5 A. Yes, I did.

6 Q. Thank you. I think it was put to you that netting or
7 pigeon spikes had something to do with it. As far as
8 you're concerned, they're nothing to do with it?

9 A. No, I just saw it fall down and catch on windows,
10 whether it was the netting or not, I don't know, but it
11 caught on the windows and ignited the -- the drapes or
12 curtains which were behind it.

13 Q. Absolutely, thank you.

14 Going back to nearer the beginning, to the point
15 where Firefighter Mullins begins to compile a list of
16 flat numbers where people have contacted brigade
17 control. He told the jury about that when he gave
18 evidence earlier and you've recorded that at the top of
19 your page 278?

20 A. Yes.

21 Q. Firefighter Mullins relayed that information to you from
22 time to time, did he not?

23 A. I -- again, along with all the other information
24 I was -- I was informed, yeah. Again, there was lots of
25 radio traffic, lots of people I was talking to.

1 I specifically wanted Mr Mullins to confirm the
2 information that had already been passed to us and
3 reiterate it and make sure that further information was
4 captured. The -- he's compiled a list and that's what
5 we used to give to Watch Manager Payton directly.

6 Q. Yes. So Firefighter Mullins was communicating this
7 information to you, mainly over the radio, but at some
8 point he actually told you face to face what had
9 received?

10 A. Yes, yes, from time to time, he was coming and going,
11 and obviously that led to the delay -- because you know,
12 he wasn't to hand all the time, that led to the delays
13 in requesting the -- the other messages to be sent.

14 Q. We know that he had learned that, in relation to some of
15 the flat numbers there were persons trapped there, and
16 indeed he told the jury that he'd written that on the
17 notepad as a sort of heading, "Persons trapped", and
18 then the flat numbers. I know it's a long time ago, but
19 do you recall whether or not he told you that persons
20 were trapped?

21 A. I -- I don't know if it was him that told me or, you
22 know, I got it from another source, but my impression
23 was that there were persons trapped.

24 Q. That was your impression?

25 A. Yeah.

1 Q. I'm grateful. The other point about this I wanted to
2 ask you was this: that we know from Crew Manager Willett
3 that he was aware that flat 79 was on the 11th floor.
4 I needn't take you to the message that conveyed that,
5 but did you appreciate that 79 was on the 11th floor?
6 It may not have meant much to you, but did you learn
7 that?

8 A. No, all I knew was it was above -- above the fire flat.

9 Q. But you did know it was above the fire flat?

10 A. Yes.

11 Q. Thank you. In the course of your evidence this morning,
12 you said that flat numbers were coming from everywhere.
13 Mr Maxwell-Scott asked you about making notes, and your
14 first answer as I've recorded it is:

15 "I didn't make notes. What I did I passed onto
16 other people."

17 Then you referred to Mr Hider and that his role was
18 to take a note throughout, and then you said:

19 "I think I wrote some numbers down."

20 Then you said:

21 "I do recall writing numbers down."

22 Then I think you said that you're not sure whether
23 you wrote numbers down.

24 A. Yeah, the last answer is probably the best -- best
25 recollection. I do remember during the incident writing

1 numbers down, but whether it was at that stage, I don't
2 know. I had so much to think of and so many lines of
3 information coming in.

4 Q. Isn't the reality that you didn't write anything down,
5 certainly at the stage when you were incident commander,
6 because if you had have made a note yourself, you would
7 have referred to it in the statements that you made to
8 the police or the ones that you made yourself?

9 A. That's right, I may have attempted to start a list,
10 that's what I'm thinking, and then decided, you know,
11 I just can't keep up with the amount of information
12 that's coming in.

13 Q. Can I ask you about Crew Manager Clarke? Can we just
14 put up page 278 again? We need the second full
15 paragraph on that page, beginning with the words,
16 "CM Clarke". Mr Maxwell-Scott has asked you about it,
17 but let's just read it together:

18 "CM Clarke reported to me. I instructed him to
19 check the other side of the building. He went and
20 cleared that area of bystanders and arranged for
21 a cordon to be set up there with the assistance of
22 Firefighters Mechen and Bennett. Once this was done,
23 I radioed through the list of flat numbers I had at that
24 time and instructed him to lead the pumps crew in
25 breathing apparatus to check those flats as a matter of

1 priority and check the conditions above the fire floor.
2 CM Clarke then assembled the pumps crew in BA and
3 entered the building."

4 The first point is you radioed that list through to
5 him, presumably you used channel 1, did you?

6 A. Yes, yes. I would have done. I mean, I don't -- in
7 mind sight I do remember briefing him face to face as
8 well, so I'm not actually sure of the content of which,
9 now.

10 Q. No-one doubts that you met him face to face, but the
11 information about the flat numbers you have written that
12 you radioed that through?

13 A. Well, that was my best recollection at the time, yes.

14 Q. This again is part of the note that you've written
15 yourself in private at home, to help yourself?

16 A. Yes, yes.

17 Q. We see indeed when you came to be asked about it later
18 in the -- sorry, just give me a moment -- yes, when you
19 came to be asked about it in the second interview at
20 page 287 -- I have the wrong reference. Anyway, let's
21 leave the point for the moment.

22 So if you radioed that through on channel 1, all
23 firefighters not wearing BA equipment would have heard
24 it on their personal radios?

25 A. Yes, assuming that they were in hearing shot of the

1 radios. If they were, you know, pumping or --

2 Q. Of course, they may not have been paying attention and,
3 in any event, focussing on the job in hand.

4 A. Yeah.

5 Q. Understood. I just want to ask about the instruction
6 that you gave him. Can we look at page 287, please? In
7 the answer to the second question, which is:

8 "Can you recall deploying CM Clarke to the
9 bridgehead and his task?"

10 Your answer is:

11 "He was deployed to establish where the flat numbers
12 were in relation to the fire. I considered that the
13 flats remote from the fire would need reassurance while
14 we put the fire out. His role was to go to the
15 bridgehead, get information on where the flats were, get
16 to the residents in that area and, if possible, go above
17 the bridgehead, staying within the lobby, and starting
18 to think about setting that up as a search sector."

19 Is that right?

20 A. No, the think about staying in the lobby, I think I've
21 left in there to try and emphasise the fact it was based
22 on his dynamic risk assessment. You know, if it was
23 safe to proceed as he was without the additional
24 resources, to go to the other flats, then he was to do
25 so, but the bit about the lobby was sort of up to his

1 discretion. I mean, I don't remember actually telling
2 him that, but it should have been --

3 Q. Well, let's take it in stages:

4 "His role was to go to the bridgehead, get
5 information on where the flats were."

6 Was he to get that information at the bridgehead?

7 A. Both, both, in my -- you know, in my recollection.

8 Q. What do you mean "both"?

9 A. Information of the flats on the same level as the
10 bridgehead and the numbers of those above it. I was
11 trying to identify for certain where 79 was.

12 Q. Well, you knew that at least flat 79 was not on the
13 bridgehead level --

14 A. No.

15 Q. -- but higher?

16 A. But there were other flat numbers to consider as well at
17 that stage.

18 Q. Yes.

19 A. I mean, 68 for example, I didn't know where that was in
20 relation to the fire.

21 Q. Right:

22 "Get to the residents in that area and if possible
23 [if possible] go above the bridgehead, staying within
24 the lobby, and starting to think about setting that up
25 as a search sector. If possible act upon flat numbers

1 and if there was an opportunity, get the people out
2 quickly."

3 So it was only if it was possible to go above the
4 bridgehead was he to do so?

5 A. Yeah, but that was tempered with the fact that I wanted
6 him to feed back to me. If he couldn't get up there,
7 then I wanted him to tell me immediately so I could get
8 additional resources.

9 Q. You say:

10 "Starting to think about setting that up as search
11 sector."

12 So he wasn't to carry out a search himself?

13 A. Well no, he didn't have the resources, it was only him
14 and another firefighter -- well, in, fact there were
15 a crew of four deployed, but the bit about the
16 implementing of a search sector was for him to tell me
17 that we could do it and I could resource that
18 appropriately.

19 Q. If we can just see what you mean by lobby, in the
20 advocates' bundle at page 191, I don't know if we can
21 put that on the screen, you drew a diagram of the
22 bridgehead when it had come down to the 3rd floor and
23 you were acting as entry control officer?

24 A. Yes.

25 Q. Do you recall that diagram?

1 A. Yes.

2 Q. We can see on the left-hand side the stairs going up and
3 down, and then there's a doorway into an area which
4 separates the north corridor from the south corridor and
5 has a door each side, yes?

6 A. Yes.

7 Q. Then in front of that there's an area in front of where
8 the lifts are, yes?

9 A. Yes.

10 Q. When you say "in the lobby," are we to take it that you
11 meant in the area not at the landing of the stairs but
12 in front of the lifts and between the north and south
13 corridors?

14 A. Yes, that's what I meant by the lobby, when I briefed
15 him I obviously didn't know the actual layout of it
16 because I hadn't been in there, but it was to stay in
17 that lobby and he would be able to see down both
18 corridors then, so he could have made an assessment as
19 to whether it was -- you know, whether he could just go
20 in there and carry out rescues immediately.

21 Q. Right, so he was to go into the lobby on the floor above
22 the fires and look through the windows to see whether it
23 was safe to proceed down there?

24 A. That's -- that was my expectation, yes.

25 Q. You go on in that paragraph at 287 -- if we could have

1 that back again -- to say:

2 "If possible, act upon the flat numbers if there was
3 the opportunity to get the people out quickly. I was
4 aware that going above the bridgehead without breathing
5 apparatus was against policy, but if conditions allowed
6 then getting people out without starting BA would be
7 quicker. I wanted him to feedback to me."

8 Of course, he was wearing BA, wasn't he?

9 A. Yes, he was yes.

10 Q. But you wanted him to report back as to whether people
11 could be got out by firefighters without BA?

12 A. Yes.

13 Q. Then going back to your witness statement at page 278,
14 having described the instructions you gave to --

15 THE CORONER: Sorry, can I just stop you, do you mean 287,
16 Mr Hendy?

17 MR HENDY: I meant 278, madam.

18 THE CORONER: Yes.

19 MR HENDY: You remember we looked at the third paragraph
20 where you first deal with the instructions to Mr Clarke,
21 and then Mr Maxwell-Scott asked you about the one
22 sentence paragraph about making pumps six and then you
23 say:

24 "Shortly afterwards I saw the fire spread upwards
25 from the 9th floor to involve the 10th and 11th floors."

1 You thought that was the Coanda effect, and
2 Mr Maxwell-Scott put it to you that from a film that
3 Mr Udi took that must have been about 16.35 or perhaps
4 a little bit later, yes?

5 A. Yes, I remember that, yes sir.

6 Q. The fact that the fire had involved other floors and
7 therefore broken out of one compartment and was
8 involving other compartments is not something that you
9 reported to control, was it, at that stage, anyway?

10 A. Well, the informative message -- with our informative
11 messages generally, if they involve a flat, we will send
12 a message to the effect of five room flat on the 9th
13 floor alight.

14 Q. Yes, and you sent one at 16.46, I think?

15 A. Yeah, but my -- my -- my informative was slightly
16 different from that, because it just -- it had
17 a percentage of each floor.

18 Q. Indeed.

19 A. So it informed the listener that it's gone beyond the
20 compartment.

21 Q. So within ten minutes you had reported to control that
22 other floors were involved?

23 A. Yes.

24 Q. The significance, of course, was that other residents
25 might have been threatened.

1 A. Yes.

2 Q. You had no discussion with control yourself and nobody
3 on your behalf had a discussion with control about what
4 control might be saying to residents who phoned or they
5 were speaking to in consequence of that news that the
6 fire had jumped a floor or two?

7 A. Sorry, could you?

8 Q. Yes, you -- or nobody on your behalf discussed with
9 control as to what the implications for residents might
10 be from the fact that the fire had gone from the 9th to
11 upper floors?

12 A. That would be correct, yes.

13 Q. Mr Clarke came down and reported to you, did he not, and
14 you deal with this at page 279 in the penultimate
15 paragraph. You say:

16 "CM Clarke returned from the bridgehead, briefed me
17 on the actions of the 352 crew and their findings. This
18 included information on rescues they'd undertaken from
19 flats on the 9th floor. I confirmed that CM Clarke also
20 passed this information to Watch Manager Payton in order
21 for him to brief the sector commander to be deployed at
22 the bridgehead."

23 Now, at that moment, as I understand it, you were
24 aware then that -- let me ask you in a different way --
25 did Crew Manager Clarke tell you that he had knocked on

1 the doors of every flat on the 9th floor, both north and
2 south?

3 A. I do not recall that at all.

4 Q. Did he tell you he'd been on the escape balcony of the
5 10th floor?

6 A. Again, I can't remember.

7 Q. Did he tell you that he had not been on the 11th floor,
8 and not been in any flat above the fire flat on the 9th
9 floor?

10 A. Again, I'm not sure.

11 Q. Wasn't it vital that you knew?

12 A. Yes, yes, obviously. I can't remember the specifics of
13 what -- what he told me. Again, it was just an enormous
14 amount of information I was trying to absorb and
15 process.

16 Q. At that stage you still didn't know that flat 79 was
17 above 65?

18 A. Not directly above 65, no, I didn't know that, although
19 I knew it was in an area above it.

20 Q. In your evidence in answer to questions from
21 Mr Maxwell-Scott, you said late this morning that the
22 first priority was to identify where the flats were to
23 carry out rescue. You said:

24 "We take risks to save lives. Finding out where
25 flat numbers were was a high priority and whether the

1 flat was above the fire flat. The rescue ..."

2 In answer to a question about the priority to be
3 given to rescue over firefighting, you said:

4 "Rescue of persons comes foremost."

5 Yes.

6 A. Yes.

7 Q. But you never did identify where flats 79 and 81 were,
8 did you?

9 A. Well, not exactly, no, but the dynamics of the incident
10 sort of took over when we were implementing the -- you
11 know, the resources to -- to go to those flats.

12 Q. You were asked by Mr Maxwell-Scott about the possibility
13 of asking control to find out what floors the flats were
14 on, or asking the police to find out where they were or
15 residents, and you took none of those steps, did you?

16 A. No, it's not a process that would -- we'd normally
17 adopt, it's just not in our normal working procedures,
18 or my experience.

19 Q. Is that really an answer?

20 A. It's a consideration I -- you know, again in hindsight
21 I could have used the -- those services, but they've got
22 their own roles, haven't they?

23 Q. But it was the first priority, you told the jury?

24 A. From the Fire Brigade perspective, yes.

25 Q. You'd asked Mr Clarke to cross to the other side of the

1 building where he and two other officers, Mechen and
2 Bennett, set up a cordon. This was when you first
3 arrived. Couldn't one of them have been asked to look
4 in the stairwell to see whether there was the usual
5 board with the numbers of the floors of the flats on it?

6 A. Yeah, I mean, that -- that is -- our on-arrival tactics,
7 that would be part of their role. I mean, they knew
8 they were going up to the upper floors, and generally
9 our firefighters would, you know, look to where they're
10 going to be going.

11 Q. But why did nobody check; why not?

12 A. I can't answer that. I mean, in my expectation as
13 a watch manager, if I was gonna be deploying my crew to
14 the upper floors, specifically to a number, and they
15 know that the signs exist, then they would do that on
16 the way in. I wouldn't necessarily need to know at that
17 stage where those flat numbers are on which floor. It
18 would be useful information for me for compiling things
19 in terms of planning, but if they're given a task to go,
20 as if anyone else was going to go into the building, you
21 would go to the sign, you know, to tell you where you're
22 going to go.

23 Q. If you had known that flats 79 and 81, people were
24 saying that they were trapped and there was
25 smoke-logging, if you had known that those flats were on

1 the 11th floor at the time that you saw the fire spread
2 to involve the 10th and 11th floors, presumably you
3 would have immediately sent a crew up to see whether
4 those people needed rescuing?

5 A. That's certainly the case, yes.

6 Q. Can I ask you about the aerial pump ladder. You told
7 the jury that you had a discussion with Crew Manager
8 Sharpe, who said that access restrictions meant, you've
9 written here "unlikely to be to be of much use". So
10 although it was there at a relatively early stage it
11 wasn't brought into use until the family we now know are
12 the Nuhus had appeared on the 11th floor on the east
13 side, yes?

14 A. Yes.

15 Q. Can I ask why it wasn't put into operation on the west
16 side?

17 A. Well, based on -- I mean, I am not an aerial appliance
18 operator, I was guided by the expertise of my crew. If
19 they said it wasn't going to be of much use then that
20 was -- I took that as being, you know, an indication
21 that it would be limited into its effectiveness. That
22 coupled with the fact that if we were to use it as
23 a water monitor into the building, we had crews and
24 obviously members of the public in there, and the jet
25 from that appliance would -- would be, you know, we --

1 before we used one of those monitors, we'd generally
2 withdraw our crews because of the danger of obviously
3 being scalded and being knocked over by water.

4 Q. Once the fire had gone from the 9th floor, where
5 firefighters were fighting it, to the 10th and 11th
6 floor, you knew that there was nobody fighting it on
7 those floors, didn't you?

8 A. Well at that stage, yeah, we was just about to commit
9 crews into there to, you know, to deal with the
10 situation but, as I said before, it would have been --
11 it would have been dangerous for all the occupants of
12 the flats, as well. I mean, obviously, you have to
13 balance that with the fact there's a fire, but the use
14 of the monitor could be --

15 Q. Well, this is a sort of a catch 22 situation, isn't it,
16 you think it's dangerous for any occupants who may be in
17 the flats immediately above the fire flat -- sorry, let
18 me start again. You think it may be dangerous for the
19 occupants in, let's say flat 79, which is immediately
20 above the 9th floor, flat 65, but it was dangerous for
21 them anyway?

22 A. I -- I appreciate that.

23 Q. The fire had taken over and nobody had gone to rescue
24 them?

25 A. Well, they were in the process of going up there, but

1 the -- yeah, I mean I fully understand what you're
2 saying.

3 Q. An ALP can be used to put up a curtain of water or
4 a fan, which doesn't carry the same risks, can't it?

5 A. It -- it could have been, yes, it could have been.
6 Again, I'm not an aerial appliance operator, and the
7 only -- you know, I've got no experience of using it for
8 that purpose.

9 Q. Did you know that a turntable ladder had been used in
10 1979 on a fire in flat 81 with great effect --

11 MR MATTHEWS: 1997.

12 MR HENDY: 1997, forgive me.

13 A. No, I didn't know that.

14 MR HENDY: You wouldn't know that. Could I ask you to look
15 at some photographs. Madam, there's discussion about
16 putting these photographs into the jury bundle, they
17 haven't gone yet, so I'm not going to be asking for them
18 to go in at the moment.

19 THE CORONER: I believe we can put them on the screen.

20 MR HENDY: Yes, I believe that's possible. If we could
21 start, please, with photograph number 8. This is much
22 later, Mr Howling. You, I think, must be entry control
23 officer by this time, you're certainly not in charge,
24 but you can see that the aerial ladder pump on the east
25 side of the building, we know from other evidence that

1 the top of that pump was at the level of the 11th floor,
2 but it couldn't get close enough to effect a rescue, but
3 in that photograph you can see it in action. If you
4 look at the other side of the building, you can just see
5 at street level the Greenwich aerial ladder pump pulling
6 in to the turning just alongside the west of
7 Lakanal House where the main entrance is, yes?

8 A. Yes, I can see what -- that that is the case, yes.

9 Q. If we then go to photograph 9, we can see the Greenwich
10 pump in position with its ladder being hydraulically
11 lifted, we can see it progressing a little bit further
12 in photograph 10, we can see in photograph 11, it being
13 used to apply water to the fire on the 5th floor.

14 In photograph number 12, we can see it being used to
15 bring water to the remains of the fire on the 7th floor,
16 and there's a better close-up of that in photograph 13.

17 In photograph 14, we can see it being used to bring
18 water to the fire I think on the 9th, or it may be the
19 10th, floor. This is a screenshot from a video film.
20 But the head of the appliance is at the level of the
21 10th floor.

22 In photograph 15, we can see that yet more clearly.
23 I can tell you, from having watched the DVD that the jet
24 is directed downwards to the 9th floor, but the cage is
25 level with the 10th floor. Now, I appreciate that

1 you're not an aerial ladder platform expert, but wasn't
2 this a sensible step which could have been taken as soon
3 as it was seen that the fire had jumped from the 9th
4 floor?

5 A. Well, obviously, it would have been at its height
6 capacity, so I was guided by, again, you know, the
7 advice of the operator.

8 Q. Crew Manager Sharpe?

9 A. Yes.

10 Q. Are you sure he gave you that advice?

11 A. Well, that's what I remember at the time.

12 Q. Well, we'll hear him give evidence in accordance with
13 his statement, I won't --

14 A. I mean it was certainly a question I asked, "Could we
15 use the ALP?" and the impression I got was that we
16 couldn't. That is my best recollection.

17 Q. At the bottom of page 278, you say that
18 Watch Manager Payton arrived then, and you briefed him,
19 detailed him to go and take over the bridgehead. You
20 say:

21 "Part of his role was also to coordinate the search
22 being undertaken by Crew Manager Clarke and E352's crew.
23 He was given a list of flats recorded by
24 Firefighter Mullins."

25 He's confirmed that. I wanted to ask you about you

1 giving him the role of coordinating the search being
2 undertaken by Crew Manager Clarke. I'm not sure that he
3 told us that?

4 A. No, it was -- probably the wording there is not strictly
5 correct. What I -- what I wanted was the two of them to
6 communicate with each other, so each one knew what the
7 other's roles were.

8 Q. I want to pick up something Mr Maxwell-Scott put to you
9 towards the end of your examination-in-chief, and at the
10 bottom of 279, you say:

11 "Watch Manager Payton informed me by radio that
12 an additional four BA crews would be required at the
13 bridgehead. In response to this, my plan was to
14 allocate BA crews from various appliances."

15 Then going to the top of 280:

16 "... to him to fight the fires above the bridgehead
17 and to instigate a search sector with the already
18 identified flats to be located as matter of priority."

19 It was at that stage that if that had been done you
20 tell the jury that the 11th floor would have been
21 searched, and if anybody could be evacuated from 79 and
22 80 they would have been done?

23 A. Well, yeah, that was -- that was the intention.

24 Q. That was the plan, yes?

25 A. Well, yeah, to go above the -- or put the fire out and

1 carry out a search, yes.

2 Q. However, the fire spread you say, to the 5th and 7th
3 floors made the bridgehead position on the 7th floor
4 untenable."

5 What happened then was that the firefighters then
6 withdrew, firstly to the 3rd floor and subsequently to
7 the ground floor.

8 A. (The witness nodded)

9 Q. They fought the fire on the 5th floor, some firefighters
10 had continued to fight on the 9th floor and then they
11 were withdrawn, and then the fight continued on the 5th
12 floor, is that right?

13 A. That's as -- I am not sure about the dynamics of when
14 the 5th floor was actioned, but at that stage I was --
15 we were just handing over, so I was elsewhere.

16 Q. But the consequence for the inhabitants of the flats on
17 the 11th floor was that nobody came for them, the
18 firefighters withdrew down the building and they were
19 left there.

20 A. The -- the decision to move the bridgehead wasn't mine.

21 Q. No.

22 A. The -- the resources were there to go up, you know,
23 ready to go.

24 Q. If you would be good enough to look at 293, the
25 questions. The second question on that page, 293, is:

1 "You say you were conscious at some point that there
2 were no crews in the building and you felt something
3 should be done, ie using the ALP. How long were there
4 no crews within the building?"

5 You answer:

6 "I am not certain that was the case. I now know
7 that there were crews committed, that was my
8 understanding at the time, and I knew we were
9 withdrawing crews. I was in Dalwood Street at the time
10 and that was my understanding."

11 You had learnt that in fact there were crews
12 fighting the fires on lower floors?

13 A. That's what I was told later on, I think at the PRC.

14 Q. Yes. But the fact of the matter is that nobody was
15 fighting the fire on the 11th floor, were they?

16 A. Well, as a result no, because their crews had been
17 withdrawn.

18 Q. To put it bluntly, the residents there were left to fend
19 for themselves?

20 A. Well, that wouldn't be my interpretation of it.

21 Q. You handed over control to Station Manager Cartwright.
22 Did you tell him that your plan was to instigate
23 a search sector as a matter of priority above the level
24 of the highest -- above the level of floor 9?

25 A. Yeah, it would have been part of my briefing, one of

1 the -- again, we go back to the decision making model.
2 We would go through our objectives and planning, and it
3 would come up with both the objectives and the plan.

4 Q. He handed over to general manager Andrews, you were
5 present. Watch Manager Payton was there and
6 Crew Manager Hider, am I right?

7 A. I don't remember that particular occasion.

8 Q. Well, let's look at the of 280, please. On the last
9 couple of lines on the page, you have written, or it's
10 been written on your behalf:

11 "A group manager, sector commander, I now know to be
12 GM Andrews, was present. The tasks required were being
13 relayed to Watch Manager Payton who was liaising with
14 myself and CM Hider to prepare crews for deployment.
15 Briefing was conducted by either myself, WM Payton or CM
16 Hider."

17 Does that refresh your memory?

18 A. Yes, now it does, but that's much later in the incident.

19 Q. Yes, and can I suggest that nobody in that briefing
20 suggested that it was absolutely first priority to
21 conduct search and rescue for flats 79 and 81 or the
22 11th floor?

23 A. Well, I don't know that, from what I gather that -- that
24 was at the forefront of our -- our objectives.

25 Q. Just to cover more points, if I may. Yes, long after

1 you'd ceased being incident commander, do you remember
2 Mr Rafael Cervi speaking to you about his wife and
3 children who were still trapped in flat 81 on the 11th
4 floor? He's sitting here.

5 A. I'm sorry, I don't. Speaking to me?

6 Q. Sorry?

7 A. Speaking to me?

8 Q. Yes, he recalls speaking to you. He spoke to several
9 firefighters at the time, but he recalls speaking to
10 you.

11 A. No, I'm afraid I don't recall, no.

12 Q. No. I think the final thing was I just want to go back
13 to a point that we were speaking about a few minutes
14 ago. Could you look at 293, please. I'm so sorry,
15 could we just pick up the question that you were being
16 asked at the foot of 292, where it says:

17 "In your first statement, you say it would have been
18 untenable to keep the bridgehead where it was. Today
19 you mention the possibility that the staircase may have
20 been tenable."

21 Your answer is:

22 "I did not know if it was, but I thought if we found
23 it was tenable then we could set up a search sector,
24 even though the fire had spread downwards, because this
25 would have been against our procedures with a fire

1 below."

2 As it's written there, I couldn't really make sense
3 of it. Are you saying that it was against your
4 procedures to set up a search sector above a fire, but
5 you would have done it anyway, or are you saying "Well,
6 we couldn't set up a search sector above a fire because
7 our procedures prevented it".

8 A. No, my understanding is that we would have gone ahead
9 and implemented a search sector if the stairway was, you
10 know, not compromised by smoke and fire.

11 Q. So, so long as the stairwell itself was -- you weren't
12 troubled about smoke, because you could send up people
13 with BA equipment, couldn't you?

14 A. Yeah, I'm just trying to work out what I would have
15 meant by that. I think the question was there was a --
16 in my first statement I said that the fire below made
17 the staircase untenable, the bridgehead positioning
18 untenable, and the question was put to me that
19 I mentioned the staircase may have been tenable.
20 I don't know if that's the appropriate answer to the
21 question.

22 Q. Well, let me ask you now, let's take the scenario that
23 we believe we all understand existed. There was a fire
24 on the 5th floor, the 7th floor, the 9th floor, the 10th
25 floor and the 11th floor, but fire had not entered the

1 that right?

2 A. On this occasion, yeah.

3 THE CORONER: Can I just stop you a moment, can you please

4 look across at the jury when you answer, otherwise we

5 can't hear your answers?

6 A. Yes, I think it was a predetermined attendance that the

7 initial attendance to Lakanal House was as it was.

8 THE CORONER: Wait for the question, please.

9 A. Sorry, yes.

10 MR MATTHEWS: You know you're being turned out because of

11 a predetermined attendance, yes?

12 A. Yes.

13 Q. What that means, that predetermined attendance, is

14 that's something that London Fire Brigade have

15 determined that because this is a high rise block

16 a certain number of appliances will be called out to

17 a fire at a high rise building?

18 A. Yes.

19 Q. The predetermined attendance was four appliances?

20 A. I think that is the case in this one, yes.

21 Q. That was, in fact, three appliances and an aerial ladder

22 platform?

23 A. That's probably the case, yes.

24 Q. Part of that predetermined attendance is that a watch

25 manager will be called out to such a fire, is that

1 right?

2 A. Yes, yes.

3 Q. Again, all of that you know upon being turned out?

4 A. Yes.

5 Q. In this case, we know that two appliances from Peckham
6 are called out and we end up with two pump appliances
7 from Old Kent Road plus the aerial ladder platform, yes?

8 A. Yes.

9 Q. So we have an extra appliance there and, is this right,
10 that extra appliance was there because there needed to
11 be a watch manager, and you were the person on the extra
12 appliance?

13 A. I -- without looking at the call slip, I'm not sure.
14 I don't know what the PDA, the predetermined attendance,
15 was. But certainly a watch manager would go on. But if
16 the -- if the PDA was two pumping appliances from
17 Peckham and the watch manager was off, then there's
18 a good chance that a watch manager could go on from
19 a neighbouring station. I don't know on this occasion.

20 Q. Okay. We'll ask somebody else. Do you know at the time
21 that that predetermined attendance is based not on the
22 specifics of the building but simply on the fact that
23 it's a high rise building?

24 A. My understanding is that the -- yeah, it varies from --
25 from place to place. You go -- you go to some stations,

1 some high rise buildings that would not have an aerial
2 appliance on it. It's not standard, it's determined
3 locally.

4 Q. What I'm trying to find out from you is when you are
5 turned out, when you're getting into that appliance and
6 you're on your way to Lakanal, you know that an aerial
7 ladder platform is coming with --

8 A. Yes.

9 Q. -- and you know that's because of a predetermined
10 attendance, yes?

11 A. Yes.

12 Q. What do you understand the role of the aerial ladder
13 platform is going to be when you turn up?

14 A. Well, you know, it's obviously going to be for rescue
15 and firefighting.

16 Q. Are you expecting to be in command of that operation,
17 including the use of the aerial ladder platform?

18 A. Yes, but I'd obviously need to be guided by, you know,
19 the experts who -- who man it.

20 Q. The other crew from Old Kent Road, the drivers of the
21 other appliances, do they know that the aerial ladder
22 platform is attending as well?

23 A. They would have known, yes.

24 Q. The only other aspect I'd like to ask you about is: you
25 mentioned how there are many high rise buildings on this

1 patch.

2 A. Yes.

3 Q. As part of your duties at Old Kent Road -- I know you'd
4 only been there a few weeks -- but were there
5 familiarisation visits being undertaken?

6 A. Yes, on my ground, certainly.

7 Q. So when you're turning up to Lakanal on this day, do you
8 expect that one or some or any of the Peckham crew will
9 have been to Lakanal on a familiarisation visit?

10 A. Probably, yes, but obviously there are a lot of them and
11 according to the -- the station inspection routine, it
12 may be that they'd not been there for four years,
13 because of a four watch system, only one watch visits
14 every year, otherwise we would never, you know, be able
15 to inspect every one.

16 Q. Okay. But I'm really asking you, if you can, about your
17 state of mind on the way to Lakanal. Are you expecting
18 that somebody from Peckham will have been on
19 a familiarisation visit?

20 A. Not expecting: considering, but not expecting.

21 Q. Do you know if you asked any of the Peckham crew?

22 A. No, because, other than Crew Manager Willett, there was
23 no-one else available.

24 Q. Thank you, that's all the questions that I have.

25

1 Questions by MR COMPTON

2 MR COMPTON: I know this officer has been sitting a long
3 time answering questions.

4 THE CORONER: Could you just get closer to your microphone,
5 please?

6 MR COMPTON: Can you hear me better now?

7 Mr Howling, I act for Apollo Property Services, and
8 I want to ask you one or two questions. Can I just take
9 you firstly back to the list? We have already heard --
10 I don't know if you were here when Firefighter Mullins
11 gave evidence.

12 A. Yes, I was.

13 Q. Can you recall what he said?

14 A. Some of it, yes.

15 Q. All right. He said that he compiled the list and that
16 he'd brought it to you and that you were surrounded by
17 a number of people and he had to forcibly really put it
18 in front of you.

19 A. Yes, I remember that, yeah.

20 Q. And that wasn't a criticism of you, it was simply the
21 state of affairs that existed at the time.

22 A. Yes.

23 Q. So there you were, as the incident commander, without
24 any plans or information on this building, trying to
25 manage this fire, would that be correct?

1 A. That is correct, yes. I mean, obviously I did what
2 I could have to gather as much information as I could.

3 Q. Yes, and you've said in your initial statement at
4 page 286 -- and I think you're being very frank here,
5 but that's a matter for the jury -- that:
6 "During the initial stages it was very chaotic."
7 Would that be right?

8 A. Very much so, yes.

9 Q. There you were, overwhelmed with information, correct?

10 A. Yes.

11 Q. You were trying to reduce your span of control --

12 A. Yes.

13 Q. -- "consciously trying to remain calm externally",
14 I suppose that begs the question of, internally, what
15 was going on; were you panicking at this stage?

16 A. I wouldn't say I was panicking, but obviously I was --
17 I was getting concerned, there was lots of multiple --
18 there were multiple objectives and -- and just a huge
19 amount of information coming my way.

20 Q. Now, this list that you were shown, you knew it was
21 an important list, didn't you?

22 A. Yes, this is the list that went to Mr --

23 Q. Mullins.

24 A. From Mr Mullins to Mr Payton?

25 Q. So you said, effectively, to Mr Payton, "This is the

1 list, take it up to the bridgehead and action it".

2 A. Yes.

3 Q. Thank you. I just want to ask you about this diagram
4 that you compiled I think after the event. We have it
5 in the advocates' bundle, page 186. Could we just put
6 that on the screen, please? These are your thoughts
7 post fire; is that correct?

8 A. That's right, a couple of days after.

9 Q. Can I just ask you to go right in the middle down to the
10 bottom, the central part of the bottom, and do you see
11 "Firefighter Mullins" there?

12 A. Yeah.

13 Q. "ICP", line:
14 "List of flats given to Watch Manager Payton."
15 Correct?

16 A. Yes.

17 Q. Do you see the arrow then --

18 A. Yes.

19 Q. -- to Crew Manager Clarke?

20 A. Yes.

21 Q. Why did you put the arrow there?

22 A. I think that refers to the question I answered
23 a couple -- a few minutes ago. I was expecting them to
24 liaise with each other or, you know, that's -- my
25 recollection is they did liaise with each other.

1 Q. Was it your understanding that they had liaised with
2 each other?

3 A. Yes.

4 Q. Have you discovered subsequently in fact that that piece
5 of paper, it would appear, remained in Mr Payton's
6 pockets and was not used?

7 A. Yeah, I didn't know that.

8 Q. You didn't know that. Would that surprise you?

9 A. Yes.

10 Q. I just want to ask you one other matter, and that is
11 about Mr Payton's evidence, please. He was to say that
12 he was not aware of a method of prioritising and was not
13 made aware of the increasing urgency of some people
14 trapped.

15 A. Well, that's not my understanding of it.

16 Q. He said:

17 "I do not recall getting any information on urgency
18 on a specific flat."

19 A. Again, that's not my understanding.

20 Q. The impression given was that in fact no flat was going
21 to be prioritised, but that you were simply going to do
22 a methodical search, floor by floor; what do you say to
23 that?

24 A. Not at that stage, no, ultimately, when the search
25 sector was set up, then it would have been methodical,

1 but obviously we had a list of priority flats.

2 Q. When you in your original statement said that you wanted
3 it actioned, is this right, that your intention in
4 giving that list to Watch Manager Payton was to take it
5 up to the floor and to tell the BA wearers of those
6 flats?

7 A. Yeah, well, the subsequent crews, because we were -- you
8 know, we were waiting for resources to go up.

9 Q. So that it would be actioned?

10 A. Yes, of course.

11 Q. Thank you, I have no further questions?

12 THE CORONER: Thank you. Mr Walsh?

13 Questions by MR WALSH

14 MR WALSH: Thank you, madam.

15 Mr Howling, you've been there a long time, I'm
16 probably going to be less than five minutes. In
17 relation to the use of the ALP, the aerial ladder
18 platform, you've told various people in answer to
19 questions that you rely upon the expertise of the ALP
20 operators --

21 A. Yes.

22 Q. -- because when an ALP attends, it has to attend with
23 specially trained people --

24 A. Yes.

25 Q. -- who know not only about how to firefight from them,

1 but how the machine operates, and how the jacks extends
2 to attain stability, which depends upon how high the
3 thing can go up.

4 A. Yes, that's correct.

5 Q. You're not trained in that --

6 A. No.

7 Q. -- you rely on them, so I'll ask subsequent people about
8 that.

9 You were asked by Mr Maxwell-Scott primarily, of
10 course, about the roughly half an hour or so from the
11 moment you arrived at 16.26 until you handed over to
12 Mr Cartwright, and you were asked a number of questions
13 about that, but of course you remained on the scene
14 after you were relieved of command until, according to
15 your statement, about 9 o'clock, when you were relieved?

16 A. That's correct, yes.

17 Q. So another four hours?

18 A. Yes.

19 Q. During the four hours that you were there -- to use
20 Mr Maxwell-Scott's words -- firefighting and doing
21 a variety of tasks, were you fully engaged throughout
22 that four hour period?

23 A. Yes, there was not a single minute that I wasn't fully
24 focussed on a task of one sort or another.

25 Q. There wasn't a single minute when you were not

1 anticipate fully engaged?

2 A. There was not one single minute, I didn't pause for
3 a drink or anything, it was just non-stop.

4 Q. You went home afterwards?

5 A. Yes.

6 Q. You told us that the following day, you were on duty
7 again, and that was a busy day?

8 A. That's correct, yes.

9 Q. Then it was the day after that that you tried to write
10 your thoughts down in the document that Mr Compton's
11 just taken you to?

12 A. Yes, it was two days later.

13 Q. It's a bit of an obvious question in a way, but it's
14 important you address it now. Was your recollection of
15 the precise tasks which you performed during the first
16 half hour of command affected by the fact that you were
17 fully engaged for a four and a half hour period on that
18 day?

19 A. That would undoubtedly be the case, yes. That's
20 obviously why I made the mind map just to pick out
21 the -- the things I remembered.

22 Q. All right. The last issue: for the period of time that
23 you were in command, from 16.26 or thereabouts onwards,
24 until you were relieved by Mr Cartwright, were you fully
25 engaged in tasks of one sort or another throughout that

1 period?

2 A. Yes.

3 Q. There were tasks that you might have performed which you
4 say you didn't when they were put to you, things like
5 having a briefing with the Peckham crews about knowledge
6 of the building and holding a briefing with residents.
7 Things of that nature were put to you and you said you
8 didn't do those.

9 A. I said -- yeah, words to the effect that I don't
10 remember there being anyone there to do that, yes.

11 Q. Would you have had sufficient time to do those tasks,
12 bearing in mind the other tasks that you were
13 performing?

14 A. No, no.

15 Q. So it's a question of making judgments of what to do and
16 what not to do at the time?

17 A. It was, yes.

18 Q. But you told us you delegated certain tasks to certain
19 people?

20 A. I tried to reduce my span of control by delegating
21 different aspects of my role, yes.

22 Q. So there it is, at that time you were 24 years
23 a firefighter, experienced in firefighting, and for some
24 years a crew manager. How has your ability to make
25 those judgments, those fine judgments of what things to

1 do and what not to do, affecting by what you have called
2 and others have called the unique nature of the fire;
3 what was it about the fire in those early stages that
4 caused difficulty for you in making those judgments?

5 A. It was the sheer intensity and rapid spread, and more
6 particularly the fact that our plans were -- I wouldn't
7 say destroyed, but delayed because of the downwards
8 spread of the fire and the unprecedented nature of that.
9 We weren't expecting that, never seen it before.

10 Q. Never mind about the downward spread, had you ever
11 before been in a position of that sort of dynamic
12 requirement of making decisions?

13 A. No, both in terms of fire spread and in terms of the
14 number of people that required assistance.

15 Q. Yes, all right, thank you very much, Mr Howling.

16 THE CORONER: Thank you. Members of the jury?

17 Questions from THE JURY

18 THE FOREMAN OF THE JURY: Thank you, madam coroner, we just
19 have the one. I'm going to put it to the gentleman
20 first but let me know if it's not clear, I'm just
21 getting some clarification. Being an incident
22 commander, would the aerial ladder not be put under your
23 control, even though, as you said, you've not been
24 trained to use it? I think what my fellow juror may
25 mean is: do you continue to have overall command of

1 everything on the site or are the aerial ladder people
2 a unit unto themselves, so to speak, because of the
3 knowledge?

4 A. The incident commander could deploy it, to say where he
5 wanted it, but he wouldn't have any expertise in terms
6 of exactly where it could go, he'd have to be guided by
7 the operators.

8 THE FOREMAN OF THE JURY: Okay, just a moment while
9 I confirm that. Thank you.

10 Questions from THE CORONER

11 THE CORONER: Thank you. Yes, Mr Howling, in fact my
12 question is very much on the same vein. Here you are,
13 you find yourself as incident commander, and so you are
14 in overall charge.

15 A. Yes.

16 THE CORONER: So all the crews and all of the appliances
17 fall under your control.

18 A. Yes.

19 THE CORONER: Now, you've told us that you relied on
20 an experienced ALP operator for advice as to whether it
21 could be usefully deployed.

22 A. Yes.

23 THE CORONER: You also told us that you found the whole
24 situation to be quite unprecedented --

25 A. Yes.

1 THE CORONER: -- and you've given us a very clear
2 description of why that was. Did there not come a time
3 during your time as incident commander when you thought
4 to yourself, "Well, I just wonder whether the ALP might
5 be some use"?

6 A. Well, that's why I asked the question of Crew Manager
7 Sharpe, you know, it was -- it would have been, you
8 know, but I was -- again, my recollection is that I was
9 guided by what he said.

10 THE CORONER: You must have some understanding yourself --

11 A. Yes --

12 THE CORONER: Can I just finish my question? In order to
13 function effectively as an officer in charge, you must
14 have some understanding of the scope and ability of the
15 crews and the appliances under your control.

16 A. Yes.

17 THE CORONER: So you must have some understanding of the
18 extent to which an ALP can be used?

19 A. Yes, that is true. It was the -- the place we wanted
20 it, as I understand it, it was where -- that's where
21 I asked -- we were directly in the position where it
22 would be, in my perception, the most use, and I asked
23 Crew Manager Sharpe, and he gave me the impression --
24 well, he told me that it wouldn't be much use, I think
25 they were his words.

1 THE CORONER: Did you think about that and did you say "Well
2 I wonder whether he's right, I wonder whether perhaps
3 he's being overcautious or not considering all the
4 aspects, and maybe, here we are, it's an unprecedented
5 situation, maybe we ought to be thinking about this"?

6 A. At the time, I was so caught up in everything else that
7 was going on I didn't really question him, you know, or
8 question his judgment.

9 THE CORONER: So it's something that didn't come across your
10 mind?

11 A. Not at those early stages, I think I asked him early on,
12 and you know, events would have unfolded and, you know,
13 I was committing all of my attention to the internal
14 firefighting at that stage.

15 THE CORONER: I see. Well thank you very much, Mr Howling.
16 Thank you very much for coming and thank you very much
17 for the evidence which you've given to us. You're free
18 to go if you would like, but you're welcome to stay for
19 the end of the afternoon if you would like to do so.
20 Thank you.

21 A. Thank you.

22 (The witness withdrew)

23 THE CORONER: Yes.

24 MR MAXWELL-SCOTT: Madam, that concludes the evidence for
25 today.

1 THE CORONER: Yes, thank you very much. Shall we just have
2 a very quick preview of next week so the jurors know
3 what is coming?

4 MR MAXWELL-SCOTT: Yes, certainly. On Monday we have two
5 witnesses scheduled, they are Station Manager
6 Cartwright, the third incident commander, and Group
7 Manager Freeman, the fourth incident commander.

8 On Tuesday we have Station Manager Guy Foster, whose
9 name we've heard mentioned before as well, and a number
10 of other firefighters. The week will be very largely
11 taken up with evidence from firefighters.

12 THE CORONER: Thank you very much, that's very helpful.
13 Thank you.

14 Members of the jury, thank you very much for your
15 patient attendance and concentration this week. You're
16 free to go. Thank you very much, and just please
17 remember the warnings I've given you about not talking
18 to people about this case at all and not undertaking any
19 personal private research. Back on Monday morning for
20 a 10 o'clock start, thank you very much. If you would
21 go with Mr Graham.

22 (In the absence of the Jury)

23 THE CORONER: Yes, thank you very much. Are there any case
24 management issues that we need to have a look at before
25 next week? Does anyone have anything to raise? I see

1 shaking heads all round. Are there any perceived
2 problems with timing? Good, all right. Well, thank you
3 all very much and I look forward to seeing you all next
4 week. Thank you.

5 (3.37 pm)

6 (The Court adjourned until 10 o'clock on Monday,
7 4 February 2013)

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