

Monday, 4 February 2013

1

2 (10.00 am)

3 THE CORONER: Yes, good morning. Do sit down. Any issues
4 to raise before we ask the jury to come in?

5 MR MAXWELL-SCOTT: Madam, just to say that we now have
6 a version of the sequence of events with the photographs
7 in.

8 THE CORONER: Thank you very much. That's very helpful.

9 MR MAXWELL-SCOTT: So this can replace the two versions that
10 are currently at tab 12. The text is the same as the
11 previous one but the photographs are now included.

12 THE CORONER: Lovely. That's very helpful.

13 MR MAXWELL-SCOTT: I think they've already been handed to
14 the advocates.

15 THE CORONER: Thank you very much. Whilst the jury are
16 coming in, I'm asked to tell you all that on the evening
17 of 27 February there is to be a meeting in this room, so
18 you'll probably all want to make sure that you've
19 removed any papers that shouldn't be left lying around.
20 There are notices up on the door, I think, to remind
21 you, but 27 February.

22 (In the presence of the Jury)

23 THE CORONER: Yes, members of the jury. Good morning.
24 Thank you. The first witness today, I think, is
25 Mr Cartwright?

1 MR MAXWELL-SCOTT: That's correct, yes.

2 THE CORONER: Thank you.

3 Mr Cartwright, would you like to come forward.

4 Thank you.

5 MR MAXWELL-SCOTT: Before he's called, if the members of the

6 jury could be given the new sequence of events.

7 THE CORONER: Of course, yes. Do you have those, Mr Graham?

8 Thank you very much. This is to replace what you have

9 in tab 12 in the jury bundle. It's the sequence of

10 events, this time with the photographs attached. Thank

11 you.

12 MR MAXWELL-SCOTT: It will replace both versions currently

13 in tab 12. It's the same text as the second one but now

14 with the photographs included.

15 THE CORONER: Thank you very much, yes.

16 PAUL CARTWRIGHT (affirmed)

17 THE CORONER: Thank you. Do sit down, Mr Cartwright. Help

18 yourself to a glass of water.

19 A. Thank you very much.

20 THE CORONER: Please could you make sure that you speak

21 fairly close to the microphone because we need to pick

22 up your voice. The typists are making a transcript, so

23 please speak at a reasonable speed so that they can make

24 a note of what you're saying. Thank you very much.

25 A. Yes, madam.

1 THE CORONER: There will be, I believe, a short fire alarm
2 test at 11 o'clock, but assuming that the sound goes on
3 only for a short time then we can simply continue after
4 it's finished. Mr Maxwell-Scott, who is standing, is
5 going to ask you questions initially on my behalf and
6 then there will be questions from others.

7 A. Thank you, madam.

8 THE CORONER: Thank you.

9 Questions by MR MAXWELL-SCOTT

10 MR MAXWELL-SCOTT: Good morning, Mr Cartwright.

11 A. Good morning, sir.

12 Q. Could you give the court injure full name please?

13 A. It's Paul Hambledon Cartwright.

14 Q. Is it right that at the time of the fire at
15 Lakanal House in July 2009 you were a station manager?

16 A. That's correct, sir.

17 Q. Are you a station manager still?

18 A. I am still a station manager, sir.

19 Q. How long have you now been employed by the London
20 Fire Brigade?

21 A. A few weeks short of 21 years.

22 Q. Can you tell the court in what year you were promoted to
23 station manager?

24 A. 2007.

25 Q. What were you in at the time of the fire in 2009?

1 A. I was an operational station manager, and my day-to-day
2 job was in charge of basic training for new
3 firefighters.

4 Q. When had you taken up that post?

5 A. That was also in 2007.

6 Q. If you could just explain that role a little more. Were
7 you, in effect, doing two roles at that time? Because
8 you mentioned being an operational station manager but
9 you also mentioned a training function.

10 A. My day-to-day job was to oversee the 17 weeks of basic
11 training given to new firefighters joining London
12 Fire Brigade, and that was all aspects from the
13 administration of being on a fire station to their real
14 fire training. I was also an on call operational
15 officer, which went that any incidents that attracted
16 a station manager, I could be mobilised to them.

17 Q. Were you based at a fire station or somewhere else?

18 A. My base posting was Southwark training centre, which was
19 Southwark Bridge Road.

20 Q. You'd been in that role since 2007?

21 A. That's correct.

22 Q. On average, how frequently would you be called out to
23 attend operational incidents in that role?

24 A. I couldn't -- without looking at the call out logs,
25 I would say probably about four or five times a month.

1 Q. Before the fire at Lakanal House on 3 July 2009, had you
2 ever been there before?

3 A. No, sir.

4 Q. I'm conscious that you're still working for the London
5 Fire Brigade and that policies and practices can change
6 over time, so if I ask you about policies and practices,
7 unless I indicate otherwise, my questions will be
8 directed to how things were done on or before the date
9 of the fire.

10 A. Okay, sir.

11 Q. Unless I indicate otherwise, my questions will relate to
12 events on 3 July 2009 between when you were mobilised
13 and the time when Group Manager Freeman replaced you as
14 operations commander.

15 A. I understand, sir.

16 Q. You've been asked to give an account of your involvement
17 in fighting the fire on several occasions, and what I'd
18 like to do first is just to identify those for you and
19 for the benefit of the members of the jury.

20 Firstly, you made some notes, I believe, in
21 a notebook. This is page 125 in file 1 of the
22 advocates' bundles.

23 A. That is my notebook, sir, yes.

24 Q. I'll just wait for you to be shown a hard copy as well.
25 (Handed) That notebook entry continues on 126 and 127.

1 A. Yes, sir, my note, sir.

2 Q. Those are notes made by you on 3 July 2009?

3 A. That's correct, sir.

4 Q. But quite late into the evening; is that right?

5 A. They would have been made at approximately 2000 hours,
6 when I went into the building on behalf of
7 Group Manager Freeman.

8 Q. Then if we stay in the same bundle and look at page 118.

9 A. I have that, sir.

10 Q. That's page 1 of seven pages of a typed memorandum which
11 says that it's from you and dated 4 July 2009. If I
12 take to you the end bit, which is page 124.

13 A. Yes, sir, my note, sir.

14 Q. It's a document which, on the face of it, looks as if
15 it's meant to be signed, but this copy is not signed.
16 But these are your notes; is that right?

17 A. They were my notes. I made them on -- in the early
18 hours of the morning on the 4th of the 7th, and the
19 signed version of it would have gone to my group
20 manager.

21 Q. When you say "in the early hours of the morning of
22 4 July", are you, in effect, saying before you'd been to
23 sleep after this incident?

24 A. That is correct, sir.

25 Q. There are six and a half pages of single-spaced type.

1 How long did it take you to write this up, can you
2 remember?

3 A. Probably two to three hours.

4 Q. Then your first witness statement was dated
5 11 July 2009. This is in a different bundle, the
6 witness statements bundle, at page 296. (Handed)

7 A. Yes, that's correct, sir. That's the draft version of
8 the statement.

9 Q. How do you mean the draft version of the statement?

10 A. When I was interviewed, it was handwritten notes taken
11 by two police officers. Several weeks later we were
12 given typed notes. This is the first version of the
13 typed notes and there are a number of inaccuracies
14 regarding names and also my time of arrival, and it was
15 corrected and sent back to be the police.

16 Q. On the face of it, this is recorded as a signed
17 statement. We see that.

18 A. Yes, sir.

19 Q. Top of the page. Is it your evidence that you didn't
20 sign this version of the statement, you signed a later
21 one?

22 A. They -- it was sent back and I was given a corrected
23 version, which I signed.

24 Q. I think that on 14 July 2009 you attended a PRC?

25 A. That's correct, sir.

1 Q. Performance review of command?

2 A. That's correct.

3 Q. If I show you, in the advocates' bundles at page 1324,
4 some notes from that.

5 A. Sorry, could you repeat the number please?

6 Q. Mr Clark will bring you the hard copy, but the first
7 page of the notes is on the screen at the moment.

8 (Handed)

9 A. They are the PRC notes, although I would not have seen
10 them at the time.

11 Q. Then you made a second witness statement in April 2010.
12 I'll ask you to be shown that. It's at page 302 of the
13 statements bundles.

14 A. That's correct, sir. That is my second statement.

15 Q. We can see that it's dated 26 April 2010 and the first
16 paragraph says that you were provided with a copy of
17 your first statement, an incident report, some plans and
18 photographs relating to the incident, and there was
19 a first interview on 1 April 2010 and then
20 a continuation interview on 26 April 2010.

21 A. That's correct, sir.

22 Q. What I'd like to do now is ask you some outline
23 questions about your role as incident commander. Then,
24 once we've established, for the benefit of the members
25 of the jury, your role in outline, we'll come back and

1 go through the events of the day in more detail.

2 A. Yes, sir.

3 Q. Is it right that your first knowledge of the incident
4 was when your colleague, Station Manager Glenny, was
5 paged whilst you were both at the Southwark training
6 centre?

7 A. That's correct.

8 Q. You were paged shortly after that?

9 A. Approximately 16.34, I was paged.

10 Q. When did it become clear to you that you would be the
11 incident commander once you arrived at the scene?

12 A. Shortly before leaving the Southwark training centre,
13 a message came through that they'd made it pumps six,
14 which meant as a station manager I would automatically
15 take over upon my arrival.

16 Q. Because you knew you were going to be the first station
17 manager?

18 A. Yes, control had told me that.

19 Q. On arrival -- we'll look at the details later -- you
20 took over from Watch Manager Howling as incident
21 commander?

22 A. That's correct, sir.

23 Q. The message sent to control informing them that you were
24 now the incident commander was sent at 1655 hours, and
25 the message stating that you had been replaced as

1 incident commander by Group Manager Freeman was sent
2 approximately 24 minutes later at 1719 hours. Obviously
3 those are times of the messages themselves. Perhaps you
4 could indicate at this stage whether that reflects your
5 memory of having been incident commander for in the
6 region of 24 minutes, or whether you think the messages
7 do not accurately reflect the actual times when you took
8 over incident command and then were relieved of incident
9 command?

10 A. I'm aware of the message log and the times are
11 inaccurate. My understanding is I took over -- I was
12 inside the command unit at the time -- I took over at
13 approximately 16.52 to 16.53 and Group Manager Freeman
14 took over from me at approximately 17.03 to 17.04, and
15 the delay was between the command unit operator getting
16 the message to control.

17 Q. We'll come back and look at that in more detail, but
18 I wanted to ask you that at the outset, because if I'm
19 about to ask you questions about, in general terms, your
20 period as incident commander, I wanted you to have the
21 opportunity to clarify whether we were talking about
22 a 24-minute period or something rather shorter.

23 A. Yes, sir.

24 Q. So your best estimate is that you were incident
25 commander for more like ten minutes; is that right?

1 A. That would be correct, sir.

2 Q. When you were incident commander, can you recall whether
3 you remained in one place or whether you moved around
4 the site at all?

5 A. I took over in the command unit and I made my way down
6 to the green in front of the west side of Lakanal House,
7 and then I remained there until I handed over to
8 Group Manager Freeman.

9 Q. Just pausing there, I'll put a photograph up on the
10 screen which may assist. This is photograph 3, and
11 that's an aerial view. Lakanal House is the building in
12 the middle of the screen which I'm marking with the
13 arrow now.

14 A. Yes.

15 Q. This is the west side of the building with the access
16 road. Is it right from what you've said that you were
17 standing somewhere on the west side of the building?

18 A. On the map you've got, where it says "Dalwood Street",
19 it's the green area just below that and I would have
20 been in there.

21 Q. Are you able to be more precise about whether you were
22 looking from, for example, the corner of Dalwood Street
23 and Sedgmoor Place or whether you were directly lined up
24 with the entrance of the building itself?

25 A. No, I -- I was -- where on the map you've got the "W" of

1 where it says "Dalwood Street", it would be just below
2 that. That's where I was standing. It was a -- I had
3 to go through a hedge, and there was a green area.
4 That's where I stood. I didn't stand in line with the
5 entrance.

6 Q. I've just put up on screen photograph 44, which was
7 taken from the corner of Dalwood Street and
8 Sedgmoor Place, not from the green but from the
9 pavement. Can you assist the court with whether that is
10 a good representation of the view that you had?

11 A. I would have been slightly more to the right. Where the
12 individual is with the yellow jacket, if you moved back
13 and then stood in the green area, I would have been
14 there.

15 Q. Thank you. Were you there when Group Manager Freeman
16 came and told you that he was taking over as incident
17 commander?

18 A. Yes, I was.

19 Q. In terms of information that was available to you as
20 incident commander, you had what you had seen from that
21 location?

22 A. That's correct.

23 Q. But you had to rely on others for information about what
24 was happening inside the building?

25 A. That's correct.

1 Q. And on the other side of the building?

2 A. That is correct, sir.

3 Q. If I could just run through with you quickly the
4 different sources of information available to you when
5 you came to evaluate the situation and make decisions.
6 Did you have the opportunity directly, as incident
7 commander, to hear radio messages from brigade control?

8 A. I heard broken radio messages on my route to
9 Lakanal House.

10 Q. Before you were incident commander?

11 A. Before I was incident commander. I knew from my pager
12 message and talking to control that we had a fire on
13 flat on the 9th floor.

14 Q. We'll come to those sort of details in a moment. In
15 terms of the method, once you're incident commander, can
16 you hear those messages from brigade control yourself?

17 A. I heard broken messages coming from the appliances to
18 brigade control.

19 Q. Did you have a personal radio?

20 A. I did have a personal radio and I did turn that on and
21 I did hear messages, once I arrived on the fire ground,
22 from crews attending the incident.

23 Q. Could you hear what crews who were committed in
24 breathing apparatus were saying?

25 A. No, sir, I was on a different channel.

1 Q. Did London Fire Brigade personnel come and speak to you
2 at the scene and pass on information to you?

3 A. The command unit staff, who -- did when I first arrived.
4 Quite possibly when I spoke to Watch Manager Howling he
5 gave me some information, and I believe there were other
6 firefighters and crew managers approaching him as he was
7 giving me the briefing.

8 Q. Did you, at any time whilst you were incident commander,
9 get information directly from other emergency services?

10 A. Not that I recall, sir, no.

11 Q. How about directly from members of the public?

12 A. Not that I recall, sir, no.

13 Q. Do you recall, when you were incident commander, at any
14 time being given information in writing on notepads, for
15 example, or was it all verbal?

16 A. I wasn't given anything in writing. There were verbal
17 messages.

18 Q. Then, turning to the methods available to you to give
19 orders and instructions as incident commander, were you
20 able to give instructions directly to brigade control?

21 A. No, sir.

22 Q. Were you able to give instructions directly over your
23 personal radio?

24 A. It is possible but I -- I didn't give any instructions
25 because the radio traffic was so -- there was so much of

1 it.

2 Q. I think it follows from what you said before that you
3 were not in a position to give instructions over the
4 radio to firefighters committed in breathing apparatus?

5 A. That's correct, sir.

6 Q. Did you give any instructions in written notes, or was
7 it all verbal?

8 A. All verbal, sir.

9 Q. Presumably you gave a number of instructions to members
10 of the London Fire Brigade. Did you give any to anyone
11 from other emergency services?

12 A. No, sir. Sorry, I got asked -- on my route down to
13 Lakanal House, there was quite a few members of the
14 public standing by our appliances, and I asked -- and
15 I'm not sure if it was a police officer or a community
16 support officer -- to put up a cordon and move people
17 away from our vehicles in case we needed equipment from
18 them.

19 Q. Did you give any direct instructions to residents?

20 A. Not that I recall, sir, no.

21 Q. So essentially you are giving your orders and
22 instructions verbally to other London Fire Brigade
23 personnel?

24 A. That's correct, sir.

25 Q. Did you make any notes yourself at the time?

1 A. The only notes I made were the ones that you displayed
2 at approximately 2000 hours in my notepad.

3 Q. So some time after you ceased being incident commander?

4 A. That's correct.

5 Q. While you were incident commander, was there anyone at
6 your side making notes for you?

7 A. We had a watch manager who was from Lewisham's command
8 unit who was taking down some detail, but they
9 weren't -- they weren't a verbatim version of what was
10 going on.

11 Q. Do you remember which command unit number that was?

12 A. It was command unit 4 from Lewisham and it was
13 Watch Manager Best who was the command unit officer.

14 Q. At what stage in events did you realise that you would
15 or might be replaced as incident commander because of
16 the size of the fire and would therefore need to, in due
17 course, brief the next incident commander?

18 A. Approximately a minute or so before I arrived at the
19 command unit, I heard mobilising control receive
20 a message of "make pumps eight", which meant that
21 a group manager would be in charge.

22 Q. So does that mean that even before you arrived you were
23 conscious that your time as incident commander was
24 likely to be quite limited?

25 A. That's correct, sir.

1 Q. So you would be required to brief the next incident
2 commander fairly shortly after receiving your own brief
3 as incident commander?

4 A. That is correct.

5 Q. Did you take any steps to ensure that you would be well
6 placed to brief the next incident commander?

7 A. The intention was to get information from the command
8 unit -- unfortunately, they didn't have any -- and also
9 receive a briefing from Watch Manager Howling, who I was
10 taking over from, and then from that information and
11 what I'd directly seen I would then brief
12 Group Manager Freeman -- although I didn't know it would
13 be Group Manager Freeman. I would brief the first group
14 manager to arrive.

15 Q. Before we turn to the events of the day itself, I would
16 like, with you, to introduce to the members of the jury
17 two London Fire Brigade policies that they won't have
18 seen before. The first is about the sectorisation of
19 incidents and the second is about the role of the
20 operations commander. I will just put the first of
21 those up on the screen. It's at page 1620 in the
22 advocates' bundles, file 4.

23 A. I'm familiar with that policy note, sir.

24 Q. That being the case, would you be able to describe
25 concisely to the jury what the nature and purpose of it

1 is?

2 A. The purpose of sectorisation, or sectorising an incident
3 is -- at a small incident -- say, a house fire -- it's
4 quite manageable for one person to deal with the front
5 and back of it. With a large incident such as
6 Lakanal House, because of the size of the incident and
7 the different tasks that were going on, we would
8 sectorise it, and that would be by delegating officers
9 to be in charge of a specific sector, and that could be
10 either an area, which would be the east side or the west
11 side of Lakanal House, and we'd also sectorise it inside
12 the building. So we'd have a manager in charge of
13 a search sector, because we knew the building was on
14 fire and we knew there were people in there. We'd have
15 a -- normally a station manager in charge of the fire
16 sector, which would be the immediate area where the fire
17 was and the floors above and below it.

18 We'd also have -- and they are operational sectors.
19 We'd also have sectors which would be support, and that
20 would be where we knew we were going to be using a lot
21 of BA wearers and we needed to have an area where they
22 could be briefed and service their sets, and that would
23 also be classed as sector.

24 So the idea behind it is you get a large fire, large
25 incident, and you break it down into manageable chunks,

1 and that's done for the organisation and also to ensure
2 that all the tasks that you need to do are covered.

3 Q. Is it right that the decision to establish sectors is
4 one that has to be taken by the incident commander?

5 A. That is correct, sir.

6 Q. Just looking at page 1622, paragraph 3.2 at the top of
7 the page:

8 " Sectors can only be created when an individual who
9 is proficient in the role is available to assume
10 responsibility for that task."

11 A. That's correct, sir.

12 Q. So one doesn't establish sectors until there is a need
13 to do so because of the size of the incident?

14 A. That's correct.

15 Q. And even then one can only do it once there are suitable
16 people to delegate that role to?

17 A. That's correct, sir.

18 Q. Then if we move on to page 1638, the policy on the
19 operations commander.

20 A. I'm familiar with that policy as well, sir.

21 Q. Can you explain briefly to the jury what an operations
22 commander is?

23 A. Again, at a complex incident --

24 THE CORONER: Sorry, can I just stop you, Mr Cartwright.
25 Please give the explanation but don't go too fast,

1 because the typists need to keep up.

2 A. Yes, madam.

3 At a complex incident, which we have now
4 sectorised -- it normally means when we've got two or
5 three sectors at least -- we put an officer in charge
6 called an operations commander who runs the operational
7 sectors on behalf of the incident commander, because the
8 incident commander has to manage the whole incident, and
9 that's to deal with the firefighting part for
10 Lakanal House and also the support functions.

11 To reduce the spans of control -- because it gets
12 quite difficult for one person to manage -- we delegate
13 an operations commander to run the actual firefighting
14 and we also delegate another manager -- or it might be
15 the incident commander who oversees the incident as
16 a whole but also the functional -- sorry, also the
17 support side of the incident. It's a way of delegating
18 immediate command from the IC to the operations
19 commander.

20 Q. Just so that we can understand better how that works,
21 what do you mean by "support functions"?

22 A. In a situation such as Lakanal House, you have dozens of
23 fire appliances, fire engines which needed to be
24 positioned. We would need to get additional stocks of
25 BA because we knew we were going to use a lot of BA

1 wearers. We'd need to have vehicles -- you'd have to
2 set up a marshalling area so that they didn't block all
3 the roads to Lakanal House. So you'd have to find
4 an area remote from the location where all the oncoming
5 crew could go to, because we had quite a -- I think we
6 had about 18 fire engines, and probably about
7 40 vehicles there by the end of the incident.

8 You'd need additional equipment taken from the fire
9 engines to the scene of the fire. We'd have more
10 officers and more firefighters coming on who needed to
11 be briefed. We would have to have rest areas. We'd
12 need to have servicing areas for our BA sets. And
13 that's what we call functional sectors.

14 Q. What about search and rescue functions? Do they fall
15 under the heading of "operational" or "support"?

16 A. They would fall under the heading of "operational" and
17 the operations commander would be responsible for them.

18 Q. I'm now going to go through the events of the day, from
19 when you were called out to when Group Manager Freeman
20 replaced you as operations commander.

21 Before we start that process, let me say this: I'm
22 conscious that it was a busy day and there were times
23 when more than one thing was happening at the same time.
24 I can only ask you one question at a time, and I can
25 only ask you about one event at a time. At times,

1 I will ask you about what order you believe events
2 happened in, but if at other times you think that events
3 happened in a different order to the order in which I am
4 asking you about them, or indeed at the same time, then
5 you should say so.

6 A. Yes, sir.

7 Q. Finally, by way of introduction, I wanted to ask you
8 about any particular problems that you found on the day
9 which made the task you faced more difficult. One in
10 particular is identified in your second witness
11 statement, to do with radio traffic.

12 A. Yes, sir.

13 Q. Shall I take you to that and then ask you to comment
14 further on it?

15 A. Okay, sir.

16 Q. This is at page 309 in the statements bundle.

17 A. Okay, I have it, sir.

18 Q. The second question was:

19 "You mentioned in your earlier statement that you
20 had problems with radios at times. Can you explain what
21 these were?"

22 So this is now your second statement in April 2010
23 and you said:

24 "It was a combination of problems. Firstly there
25 was a lot of radio traffic and it was difficult to get

1 in at times on the handheld radio. Only one person can
2 transmit over handheld radio at any one time. I believe
3 messages were sent and it was unclear that they were
4 received. The message was sent again, possibly while
5 the other person was trying to respond. People were
6 cutting over each other, I believe because they were
7 unaware that another person was transmitting. It was
8 apparent that people were not responding to messages, so
9 I ended up either sending a runner with the message or
10 walking round to the operations commander
11 (Group Manager Freeman) myself to pass on information."

12 Does that reflect your memory of some of the
13 difficulties of the day?

14 A. That's correct, sir, yes.

15 Q. The final sentence that I read out talked about you
16 walking round to the operations commander,
17 Group Manager Freeman. That would have been some time
18 after you were incident commander, wouldn't it?

19 A. That's correct.

20 Q. Because after you were incident commander,
21 Group Manager Freeman replaced you, and you became the
22 operations commander, and then subsequently he was
23 replaced as incident commander and replaced you as
24 operations commander?

25 A. That's correct, sir.

1 Q. The points that you make in this paragraph about
2 problems with radio traffic and having to send messages
3 with runners, did they apply in the same way to the time
4 when you were incident commander as to the time when
5 Group Manager Freeman was operations commander?

6 A. During the time I was incident commander, I didn't have
7 to send any runners, although the volume of traffic
8 coming over the radio was -- it was difficult to
9 understand what was going on, and I had a command
10 unit -- as I say, a command unit operative next to me
11 and this is where the delay comes in between a message
12 being written down by the command unit operative and it
13 actually being sent, because he had to walk all the way
14 back to the command unit, which was about 50 metres
15 away, because he couldn't get through on the radio.

16 With regards to when I was the operations commander,
17 several times I tried to get -- it happened when I was
18 called round to the side of the building to be informed
19 that they believed that people were about to jump from
20 the building, and started doing a rescue round there.
21 I was trying to tell Group Manager Freeman, who, at that
22 stage, I thought was the incident commander still, what
23 we were trying to do with the ALP. I couldn't get
24 through on the radio, so once I positioned the ALP
25 I physically walked round to speak to him to tell him

1 what was going on.

2 Q. I'm now going to take you back to the very beginning of
3 your first involvement on the afternoon of 3 July. You
4 told us that your first awareness of the incident was
5 when your colleague, Station Manager Glenny, was paged.
6 What did the two of you do after his pager activated?

7 A. At approximately 16.30, Station Manager Glenny, who sits
8 in the same office as myself, was paged, because he's
9 a press officer and he was informed that there was
10 a fire at Lakanal House and as a press officer, he
11 may -- he has the option of whether to attend it or not
12 at that stage, and I think -- I believe it was a four
13 pump fire. Where I was sitting, what I did, I went onto
14 the computer and, using Google, I pulled up the rough
15 area. I typed in where the street was and I told my
16 colleague -- pointed it out on the -- on my screen.
17 I said, "Okay, that's where Lakanal House is", and then
18 I turned on the -- we have, like, a listening station
19 which we can listen to our main scheme radio. It wasn't
20 particularly clear, and I switched that on and because
21 I wasn't involved in it, I just carried on with my
22 normal work.

23 Q. Were you then yourself paged shortly after that?

24 A. Yes. At approximately 16.34, my pager activated, and it
25 was informing me of a four pump fire to a 9th floor flat

1 which was Lakanal House, Havil Street, which I thought
2 was unusual because at a four pump fire, as a station
3 manager, I would be mobilised, not informed. I then
4 phoned -- when I got through, I spoke to our mobilising
5 control. As I was talking to them, my pager activated
6 again to say I was now being mobilised, and then I spoke
7 to the control operator to obtain more information of
8 what I was going to, and that would have taken the form
9 of me reading the details of my pager back to the
10 control operator to confirm they were correct and then
11 asking specific questions about the incident I was about
12 to go to.

13 Q. Just pausing there, if you look at the notes that you
14 wrote up on 4 July at page 118 -- it's probably better
15 to find it in the hard copy because it's quite small
16 text. I'm going to ask you about the bottom paragraph.
17 Page 118 of file 1 of the advocates' bundles.

18 A. Okay, I have it, sir.

19 Q. Thank you. The paragraph begins:

20 "At 16.35 my pager activated ..."

21 Then you go on to say you contacted brigade control
22 and then you say what you were told:

23 "There was no informative from the incident at this
24 stage but control had received a large number of calls
25 for the address and some of these were from the

1 residents reporting they were stuck on the upper floors
2 due to smoke-logging."

3 Then you wrote:

4 "The control operator told me that the control
5 commander had made the incident 'persons reported' and
6 had requested the attendance of the London Ambulance
7 Service."

8 That's what you wrote on 4 July. If I show you now
9 the typed up version of your contact with brigade
10 control at page 453 of the advocates' bundles.

11 THE CORONER: Mr Cartwright, you can look at it on the
12 screen if you want.

13 A. It's probably easier, thank you.

14 MR MAXWELL-SCOTT: I think OE57 is you; is that right?

15 A. That's correct, yes.

16 Q. So this is a conversation between you and control at
17 1634 hours. Have you seen this before?

18 A. No, sir.

19 Q. I'll take you through it more slowly in that case. The
20 first speaker is Tina Weston, who worked in brigade
21 control, who answers the telephone. So should we assume
22 this is you calling her because you've been paged?

23 A. Yes, sir.

24 Q. You say that you've just been mobilised to a four pump
25 fire in Camberwell, and then you're told:

1 "On the 9th floor, Lakanal. We've got two fire
2 survivals going on at the moment. It's Echo 37's
3 ground."
4 So it's Peckham fire station's ground. You're
5 asked:
6 "Do you want to know who's on it, all of them?"
7 You say:
8 "Please, yes."
9 The answer is the two pumps from Peckham, the two
10 pumps from Old Kent Road, and Echo 355, which is the
11 aerial ladder platform from Old Kent Road. You're also
12 told that CU4, command unit 4, is on it, and you ask:
13 "Can you tell me who the incident commander is?"
14 You were told it's John Howling. Then you ask:
15 "Have you had anything back from there at all?"
16 You say:
17 "I take it it's multiple calls, is it?"
18 Then you're told:
19 "Yeah, loads."
20 And you're told:
21 "This message is from our staff saying about callers
22 being trapped in their flats."
23 You say:
24 "Right."
25 Then the operator says:

1 "Nothing back from them yet."
2 And then you asked:
3 "You haven't got any persons reported or anything
4 else?"
5 And you're told:
6 "No, it doesn't look like it."
7 Then you said:
8 "Any underwrites at all for that area?"
9 Just explain what that means?
10 A. Yes, if -- if we were aware that something like
11 Lakanal House -- say, its dry risers were inoperative,
12 then we would be told that additional appliance were to
13 go on, or if there was an issue with the hydrant
14 supplies in the area we'd also be aware of that. If
15 there was any particular areas where there was
16 an additional risk, such as cylinders or -- or
17 chemicals, we also might be informed of that as well,
18 and that's what we would call underwriting.
19 Q. Is that in some way a reference to the control risk
20 register, the CRR, or is that something else?
21 A. No, that would be something else, sir.
22 Q. Then you're told:
23 "No, nothing out of the ordinary."
24 Over the page, you say:
25 "Okay, lovely, if you could show me status 2."

1 What does that mean?

2 A. That means I'm now mobilised.

3 Q. CRR; can you --

4 A. Central risk register.

5 Q. But underwrites are not to do with that?

6 A. Underwrites are normally temporary issues, such as poor
7 water supplies in the area, or, as I said, if we were
8 aware of a defective dry riser in Lakanal House or any
9 buildings nearby, it would also be on the underwrite,
10 because it might not be for a specific building, it
11 might be for the road.

12 Q. Just going back to page 453. This is no criticism of
13 you at all, but this typed-up version of the call has
14 you specifically being told that it is not persons
15 reported, whereas your recollection when you wrote up
16 your notes on 4 July -- so under 24 hours after the
17 fire -- was that you were told that the control
18 commander had made the incident persons reported?

19 A. That's correct. I was also told that because of the
20 amount of calls they'd received, they were sending
21 an additional two appliances.

22 Q. Do you think that there was some other contact or
23 communication at this very early stage when you were
24 told that, or do you think that your recollection when
25 you wrote up your notes on 4 July was inaccurate on this

1 point?

2 A. No, when I spoke -- I believe there is more to that
3 conversation. They mentioned persons reported. That's
4 why I didn't make it persons reported when I arrived,
5 because in my view it already was. They also said to me
6 about two additional appliances, and if you look at the
7 mobilising log for when they make pumps six, which
8 happened probably about the same time as this
9 conversation, control didn't send two more; they sent
10 four more appliances. So they actually sent eight fire
11 engines on a six pump fire.

12 Q. Just on the persons reported point, if you have a look
13 at page 415 in the same set of documents. This is now
14 back into file 1, for those using the hard copy. At the
15 top of the page is radio traffic at 1723 hours, and
16 you'll see in the third line it says to command unit 4:

17 "Charlie uniform 4, just for your information,
18 control commander at control is making this incident
19 a persons reported. We haven't actually had that
20 priority from anybody at this incident. Over."

21 So that suggests that nobody made the incident
22 persons reported until 17.23, although when it happened,
23 it was initiated by the control commander rather than
24 the fire ground?

25 A. I can't account for the log but I'm certain that during

1 my telephone conversation, the only one I had with
2 control, it was mentioned.

3 Q. If we go back to your notes of 4 July at page 119 now.
4 At the very top of the page, you wrote:

5 "As I was about to leave my office on the 4th floor,
6 I heard the message 'make pumps six' come from Watch
7 Manager Howling, and I assumed that I would become the
8 incident commander when I arrived at the scene."

9 I'm going to ask you now to turn to page 395 to have
10 a look at that radio message. It's the top message on
11 page 395 at 16.36.44, and in around about the middle of
12 the message we see E351 say:

13 "FS, Echo 351 from Watch Manager Howling. Make
14 pumps six. Over."

15 The operator confirms receipt of that message by
16 saying:

17 "Echo 351, make pumps six received. Further
18 traffic. Over."

19 Indicating they are going to pass something on; is
20 that right?

21 A. That's correct, sir.

22 Q. Echo 351 says:

23 "Go ahead with further traffic."

24 Then the message from brigade control is as follows.

25 "Echo 351, stand by ... Echo 351, we've got some

1 information regarding residents that are trapped in
2 their flats. In flat 68, six, eight, caller is trapped
3 in their sitting room, and in flat 79, seven, nine, they
4 cannot open the front door to get out of the property.
5 Both flats smoke-logged."

6 Now, you've told us and you wrote in your notes on
7 4 July that you heard the message "make pumps six",
8 which we can see on the screen. Did you also hear the
9 message that followed afterwards about residents trapped
10 in flats 68 and 79?

11 A. I don't recall the exact flat numbers. I do recall
12 there was talk about smoke-logging in the flats.

13 Q. Do you recall being told that residents were trapped in
14 their flats?

15 A. In the earlier bit you -- you brought up, it's got
16 a thing in there called "fire survival". I wasn't aware
17 what "fire survival" meant. However, for a typical high
18 rise fire, it is not unusual to have people make calls
19 to say they are trapped in their flats due to smoke.

20 Q. Just taking you to the bottom of that message, where
21 there's further traffic, the final statement made by the
22 operator to Echo 351 is this:

23 "Just for your information, we're also receiving
24 a call from flat 80, eight, zero, regarding heavy
25 smoke-logging. Over."

1 Do you recall hearing that message at the same time
2 that you heard the "make pumps six" message?

3 A. When I heard "make pumps six", I knew that I was going
4 to be incident commander. I was making my way from my
5 office, which was on the 4th floor of the training
6 centre, along a corridor and down some stairs to an
7 external carpark. So it's quite possible I would have
8 heard some of the message. As to the exact detail of
9 what I heard, I couldn't recall with any accuracy, as
10 I was already walking down -- or making my way down to
11 my car.

12 Q. Just looking at what you said in your notes on 4 July,
13 back at page 119, in the first paragraph I took you to
14 your recollection of hearing "make pumps six" and then,
15 in the next paragraph, you say it took you a few minutes
16 to arrive at your car. After you did, you turned on the
17 radio and you could hear messages from control to the
18 appliances mobilised to the incident, informing them
19 that smoke was in some of the flats but it was difficult
20 to make out the full details because of radio
21 interference. You say that en route you could hear more
22 broken messages and in the final sentence, the next
23 segment of the message you could hear was the mobilising
24 of call signs to an eight pump fire.

25 A. That's correct, sir.

1 Q. The mobilising of call signs, is that the message "make
2 pumps eight" or is that something different?

3 A. I can't -- I believe I heard "make pumps eight" or --
4 I don't think I heard "make pumps eight", but I think
5 I heard control say, "You're being mobilised to
6 an eight-pump fire", because some of the appliances
7 would have been in the station and other appliances may
8 be en route to go and stand by at a station when they
9 were mobilised. And it wasn't only fire appliances; it
10 was also support vehicles.

11 Q. If I could refer to you the sequence of events which is
12 in the jury bundle at tab 12. (Handed) If you turn to
13 page 7. At the top of the page there's an event timed
14 at 16.38.56.

15 A. Yeah.

16 Q. Which is a mobilisation of a number of appliances and
17 personnel, and just for reference --

18 (Disturbance)

19 Q. -- that is 11 minutes earlier than the formal "make
20 pumps eight" message. Does that help you to remember
21 what it is that you heard on the way?

22 A. 16.38, I would not have been at my car at that stage.
23 I would have been making my way to it. As I said
24 earlier, when I spoke to control, they told me they were
25 gonna be sending two additional appliances. The 16.38

1 mobilisation is for make pumps six, and as you can see
2 on there, they actually sent four appliances, not two.
3 That's why I say that on the conversation I had they
4 told me that two additional appliances were being sent,
5 which is why we had eight appliances now attached
6 attached to this incident, not six. But the actual
7 messages here I would not have heard because I would be
8 making my way downstairs to get to my car.

9 Q. In that case, what I will do next is to show you some
10 messages that were sent between 16.44 and 16.50 to see
11 whether any of those are messages that you think you
12 heard whilst en route or indeed at the time you arrived
13 at Lakanal House.

14 A. Okay.

15 Q. So firstly if you look in the bundle of documents at
16 page 397, file 1 of the advocates' bundles. At the top
17 of the page we've got an informative message, 16.45.05,
18 from Watch Manager Howling.

19 A. No, I did not hear that, sir.

20 Q. Then at 16.46 -- so the third box on this page --
21 a radio message from brigade control to E351 about smoke
22 in flat 57 on the 9th floor and a young baby inside the
23 flat.

24 A. No, I did not hear that message.

25 Q. Then, over the page at 398, at the top of the page,

1 16.49.24, we have Watch Manager Howling making pumps
2 eight.

3 A. That is quite -- that's quite possibly the message
4 I heard, the make pumps eight. I personally thought it
5 was them talking to appliances or call signs to go to
6 make pumps eight, but it may well have been that
7 message.

8 Q. If it was that message, did you hear that whilst you
9 were still driving or do you think you'd arrived by
10 then?

11 A. I believe I was still driving. Whether it was in
12 Southampton Way or Havil street I can't recall exactly,
13 but it was fairly soon before I arrived at the command
14 unit. To put it in perspective, from leaving Southwark
15 to get to this incident, my siren would have been on
16 continuously, which is why quite a few messages would
17 have been missed.

18 Q. In terms of the approximate time when you arrived, in
19 your second witness statement, you gave a time. In that
20 you said:

21 "I never took a record of my arrival time but
22 I think I arrived about 16.50."

23 A. (The witness nodded)

24 Q. When you described your initial impressions on arrival
25 in your notes at page 119 -- I'm looking at the

1 penultimate paragraph on page 119, which says:

2 "As we walked to the scene ..."

3 Do you see that?

4 A. I've got the bit where it says I think I got there at

5 16.49. Is that the paragraph you're looking for?

6 Q. I'm looking on page --

7 A. Oh, yeah, I've got that.

8 Q. "As we walked to the scene ..."

9 And then about four lines down you say:

10 "As I got closer to Lakanal House, it appeared that

11 five different floors were alight and large amounts of

12 thick smoke was being given off."

13 A. Yes, I've got that, sir.

14 Q. "I could see a single ineffective jet (70 millimetres

15 and was not extinguishing the fires) was spraying water

16 on the lower two floors, 5th and 7th floors."

17 If you have a look in the sequence of events, tab 12

18 of the jury bundle at page 16. Can you help us with how

19 closely that photograph resembles what you recall seeing

20 when you first had a view of Lakanal House?

21 A. Yes. As I walked down the road, I was walking on the

22 side of Dalwood Street where Fontenelle is, and

23 Fontenelle was obscuring the majority of Lakanal House.

24 I could see people pointing up at the building. I still

25 couldn't understand why I didn't see the fire or

1 couldn't see any smoke, and when I reached the end of
2 Fontenelle House I then looked at the building. It was
3 very similar to that, although from my recollection
4 there was more smoke and I believe there was visible
5 flame coming out of the 7th floor.

6 Q. Can you recall how many water jets from ground level
7 were being deployed?

8 A. There was one jet being used and it was -- it was moving
9 between --

10 Q. As in this photograph?

11 A. Yes, as you see there, and it was being moved between
12 the fires on the 5th floor and the 7th floor.

13 Q. And that photograph is timed 16.49.23?

14 A. That's correct.

15 Q. Winding back the clock very slightly, is it right that
16 you parked near command unit 4?

17 A. That's correct, sir, yes.

18 Q. And then, before making your way to view the scene as we
19 see in the photograph, you spoke to someone working
20 within command unit 4?

21 A. That's correct, sir, yes.

22 Q. What did they tell you?

23 A. Well, my expectation of going on the command unit was
24 that there would be some form of plan of the building
25 and then a list of all the personnel, or list of the

1 appliances and the officers available, and that they
2 would have a copy of all messages that had been sent
3 from the fire ground and from control. I stepped on the
4 vehicle and all there was on this board where I thought
5 there would be a plan was John Howling, who was the
6 watch manager in charge of the incident, and that was
7 it. I asked for the messages, which they didn't have.
8 I asked what resources -- I told them that it was
9 an eight pump fire -- I knew it was an eight pump fire,
10 and what did we have, and I believe they said -- I think
11 we had most of them there, because bearing in mind that
12 they actually mobilised eight appliances to a six pump
13 fire, so the -- I think all the appliances had arrived
14 by that stage.

15 I asked them a few more questions about the actual
16 building itself. There was -- there was two operatives
17 in there. One of them was Watch Manager Best and he
18 was, I would describe, sweating profusely. He had some
19 incident command tabards under his arm, and I was asking
20 him questions and he couldn't give me any information.
21 And there was another commanding officer I now know to
22 be Watch Manager Cook, and he had a handheld radio which
23 was constantly receiving traffic from the fire ground,
24 and he had the mobilising radio and that was
25 constantly -- information was constantly being passed on

1 that as well. I think -- at that stage, I believe that
2 was being passed to the appliances, Echo 351, not the
3 command unit, because I don't think it was fully set up
4 then.

5 Within about one or two minutes, it transpired they
6 had very little information and I asked them if they
7 needed any more help because I could see they were
8 overwhelmed. The watch manager said we have another
9 command unit on its way anyway because of the size of
10 the incident and he said, "You need to go down and have
11 a look at this." As I was asking him questions about
12 this, I think he said, "You need to go and have a look
13 at this", and my recollection was I said something like:
14 "You'd better take me down there then."

15 Q. You said something about asking if there were any
16 messages. Would they be messages coming in as well as
17 going out?

18 A. They would have been a record of all messages relating
19 to that incident.

20 Q. In and out?

21 A. In and out.

22 Q. And you were told there were none?

23 A. They didn't have them.

24 Q. If you could turn to page 344 in the advocates' bundle,
25 file 1. You won't have seen this before.

1 A. No, sir.

2 Q. It's a typed up note of a telephone call. Not a radio
3 message, so similar to your telephone call.

4 A. Okay, sir.

5 Q. So it's not radio traffic. Can you just confirm for the
6 members of the jury that there are telephones within
7 command units?

8 A. Yes, they do have a direct line to control.

9 Q. This is timed at 16.44.40, a conversation between
10 Paul Real at brigade control and command unit 4.
11 Mr Real, the second thing he says is:

12 "Hello, these are two flats we've passed to
13 Echo 371."

14 Command unit 4 says:
15 "Yeah."

16 And then Mr Real says:
17 "68, 79. We're still talking to both callers.
18 They're in a right old state. There's a lot of smoke in
19 both flats."

20 Command unit 4 repeat back the numbers:
21 "68, 79, yeah."

22 And then Mr Real says:
23 "68 and 79. I think it's -- obviously I don't know
24 what's going on down there, but if they could get
25 someone up there really quick."

1 Command unit 4 say:
2 "Yeah, okay."
3 Mr Real says:
4 "We've been on the phone to them probably a quarter
5 of hour now."
6 Command unit 4 says:
7 "Right."
8 Mr Real said:
9 "And they really are in a state, both the people."
10 Command unit 4 say:
11 "Okay, okay, I'll speak ..."
12 Mr Real says:
13 "Yeah, both of the flats are unable -- they reckon
14 they're unable to get down to their front doors 'cos of
15 the smoke."
16 He goes on:
17 "So they're going to have to force an entry. But if
18 you could do that as a matter of urgency, I'd appreciate
19 it."
20 Command unit 4 says:
21 "Yeah, we'll do that straight away, Paul."
22 That essentially is the end of the call.
23 Firstly this: as a telephone call, that would not be
24 subject to the same problems of radio traffic cutting in
25 and out, would it?

1 A. That's correct.

2 Q. We assume from what you've told us so far that this
3 telephone call would have finished about five minutes or
4 so before you arrived at command unit 4?

5 A. That would be correct, sir.

6 Q. What, if anything, did command unit 4 tell you about
7 what you've now read in that telephone call?

8 A. They didn't pass that information on. As I said in my
9 statement, when I got in the command vehicle, I believe
10 the two command unit operators were being overwhelmed
11 with the amount of information they were receiving.

12 Q. As far as you could see, they didn't have a note of any
13 of it; is that right?

14 A. Not that they could show me. As to whether they had
15 made a note, it might possibly have been in the command
16 unit, but it certainly wasn't shown to me when I asked
17 for any messages.

18 Q. That was, one might think, a good opportunity for them
19 to show you any notes they had of messages?

20 A. It would have been, yes.

21 Q. Then if you go over the page to 345. This is now
22 16.49.49. This is another telephone call between
23 Mr Real from brigade control and command unit 4. About
24 six lines down, Mr Real says:
25 "Any news on getting someone up to 68 and 79?"

1 Command unit 4 says:
2 "Yeah, I've spoken to the incident commander and
3 he's aware of it and he's ..."
4 He goes on:
5 "He's definitely on the case. They've definitely
6 got crews up there."
7 Mr Real said:
8 "All right, 'cos the lady in 79, her ceiling's
9 coming down now."
10 Command unit 4 say:
11 "Okay, I'll update them of that as well."
12 Mr Real says:
13 "Ah -- they're there. Hang on, I think someone's
14 just telling me they're there. Hang on."
15 Then Mr Real goes on to say:
16 "Right, all right, you couldn't -- on the same floor
17 we've had calls from 82 and 80."
18 CU4 say:
19 "Hang on a second. Right, 82."
20 Mr Real says:
21 "82 and 80."
22 CU4 says:
23 "Yeah."
24 And Mr Real says:
25 "There's people in both of them but it could be one

1 of them might have a baby in one of them. We're not
2 sure."

3 CU4 say:

4 "Okay."

5 And Mr Real says:

6 "They're in such a panic now."

7 CU4 says:

8 "All right, I'll speak to them."

9 That call finished, according to this document, at
10 16.50.50. Was anyone from command unit 4 on the
11 telephone when you met up with them at the unit?

12 A. From my recollection, which would have been shortly
13 after this, there was one person holding onto his
14 handheld and possibly holding onto the main scheme
15 radio -- it could have been a telephone; the handsets of
16 the main scheme radio and the telephone look very
17 similar -- and that would have been Watch Manager Cook.

18 Q. So you have a recollection of him being either on the
19 radio or the telephone?

20 A. Yes.

21 Q. Do you recall him saying to you anything along the lines
22 of what you now see written up and typed up as a version
23 of the telephone call at 16.49?

24 A. The only recollection I have of speaking to Watch
25 Manager Cook was that he told me about most of the

1 appliances being there when I said I knew it was
2 an eight pump fire, and also he acknowledged when I
3 handed him my nominal role board and asked him to book
4 me in as the incident commander. That's the only
5 conversation I remember having with Watch Manager Cook.
6 Most of my talking was done with Watch Manager Best.

7 Q. With either of them, whilst you were at the command unit
8 before you went to the fire ground, was there any
9 discussion about people being trapped?

10 A. No, not at that stage.

11 Q. Was there any discussion about people being still on the
12 line to brigade control?

13 A. Not that I recall.

14 Q. Was there any discussion about individual flat numbers,
15 putting to one side for the moment what those numbers
16 were?

17 A. No, sir.

18 Q. Do you remember hearing the number 68?

19 A. No.

20 Q. 69, 80?

21 A. I don't really being -- being told of any numbers.

22 Q. Your notes on 4 July suggest that you told the control
23 operators to inform control what you were taking over as
24 the incident commander before you left the command unit
25 to go to see Mr Howling?

1 A. That's correct, sir.

2 Q. But of course you wouldn't necessarily know when this
3 message was in fact transmitted to brigade control?

4 A. No, it wasn't sent by the time I left the command unit.
5 One of the reasons that would not have happened is
6 because informing control of a new incident commander
7 is -- is not seen as a priority message, so any -- any
8 priority messages going to the command unit would take
9 precedence and they would wait until there's a natural
10 break to inform them.

11 Q. If I just ask you now then to have a look at page 346 in
12 the advocates' bundles, file 1. This is over the page
13 from where we were. This is now 16.55, another
14 telephone conversation between Mr Real and command
15 unit 4. In the middle of the page we can see Mr Real
16 says:

17 "Yes, I know I've passed you a few flats where we're
18 having calls from. Flat 79 is the urgent one at the
19 moment."

20 CU4 say:

21 "Yeah, yeah, we've got that written down here."

22 Mr Real says:

23 "Right."

24 CU4 says:

25 "They're doing that as a matter of priority."

1 Mr Real said:

2 "Yeah, if they can, because the ... we were talking

3 to the woman. She's now stopped talking to us and we

4 can't hear her breathing at all."

5 CU4 said:

6 "Right, okay, I'll run round and take that up."

7 At the bottom:

8 "79 seems to be the real big problem."

9 CU4 say:

10 "Okay, then."

11 That was 16.55.03. Before I ask you a question

12 about that, I'll take you to page 398. The third box is

13 16.55.34. This is CU4 now communicating with control by

14 radio, saying:

15 "CU4 now incident commander at this incident.

16 Further traffic. Over."

17 At the bottom of the box:

18 "Oscar echo 57 ..."

19 That's you, isn't it?

20 A. Correct, yes.

21 Q. "... now in attendance. Station Manager Cartwright now

22 incident commander."

23 Can you recall whether you were present when either

24 of those messages we've seen at 16.55 were sent from CU4

25 to brigade control?

1 A. No, at this stage myself and Watch Manager Best from the
2 command unit would have been down with Watch Manager
3 Howling, which would have been on the west side of
4 Lakanal House. There would only have been one control
5 officer in the command unit at that stage, who was Watch
6 Manager Cook.

7 Q. Madam, is that a convenient moment for a mid-morning
8 break?

9 THE CORONER: Yes, that sounds a good idea. Thank you very
10 much.

11 Members of the jury, do go with Mr Graham. Leave
12 your papers on the desk if you would like to, just for
13 a ten minute break, thank you.

14 Mr Cartwright, we're going to have a short break,
15 just ten minutes. The strict rule, which I do ask you
16 to comply with, please, is that you must not talk to
17 anyone about your evidence or this matter because you're
18 half way through giving your evidence.

19 A. I understand, madam.

20 THE CORONER: Thank you. So if you could be back in ten
21 minutes.

22 (11.25 am)

23 (A short break)

24 (11.35 am)

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

1 jury in, please.

2 (In the presence of the Jury)

3 THE CORONER: Yes, thank you.

4 MR MAXWELL-SCOTT: Mr Cartwright, we'd reached the point
5 where you'd left command unit 4 and made your way over
6 to Lakanal House. Did you then meet up with Mr Howling?

7 A. That's correct, sir, yes.

8 Q. How soon after meeting up with him did you tell him that
9 you were taking over command?

10 A. Almost immediately. I told him that I knew it was
11 an eight pump fire and that I -- I had taken over.

12 Q. If I could refer you to your note from 4 July 2009 about
13 your conversation with him. It's at page 119 of the
14 advocates' bundles. I'm looking at the bottom of the
15 penultimate paragraph. About five lines up, it says:

16 "I saw only one WM."

17 So "I saw only one watch manager"?

18 A. That's correct, sir, yes.

19 Q. "He was wearing the incident commander tabard ..."

20 What does that look like?

21 A. It's a surcoat which is white in colour and has
22 "incident commander" written on the back of it.

23 Q. "... and I recognised him as Watch Manager

24 John Howling."

25 Then you wrote:

1 "As I approached him, it was apparent that he was
2 under a great deal of pressure."

3 What was it that gave you an impression?

4 A. He was being swamped with information. The radio
5 traffic was continuous. He was sweating and just by the
6 look of his face, I could see that he was under a great
7 deal of pressure.

8 Q. You wrote:

9 "I told him immediately that as it was now an eight
10 pump fire I was taking over. As he was still giving out
11 instructions to crews, I said, 'Do that first and then
12 brief me on the incident', so not to delay the
13 firefighting operations."

14 Do you recall what instructions he was giving to
15 crews at that time?

16 A. Not in any detail, sir. It would have been along the
17 lines of telling crews where to go and -- it would have
18 been more along the lines of deploying people, and he
19 was also receiving information about what was going on,
20 I believe, round the back of the building, and also what
21 was going on inside the building.

22 Q. Then you wrote, the final paragraph here:

23 "He came over to me and started to brief me on his
24 actions. This was continuously interrupted because he
25 was receiving radio traffic from both inside the

1 building and also from personnel who were reporting
2 information to him from outside."

3 Is that correct?

4 A. Yes, he would have been in contact with the bridgehead
5 inside the building.

6 Q. Then you wrote:

7 "Despite these interruptions he told me that he was
8 using a dry riser and had set up a bridgehead on the 7th
9 floor. There were people involved, but he did not know
10 the numbers and he was planning to set up an aerial."

11 Is that correct?

12 A. That's correct, sir, yes.

13 Q. What did you understand by him saying "there were people
14 involved"?

15 A. Well, it was obvious by the time of the day and the type
16 of building and the fact that you could see people in
17 various parts of the building from time to time that
18 this incident would involve the occupants. By saying
19 that people was involved -- because of the amount of
20 building that was on fire, and the amount of smoke that
21 was being given off, it was obvious that the people were
22 gonna be -- we were gonna have people injured or worse.

23 Q. That was obvious to you from your first moment of taking
24 command, was it?

25 A. It was, from the speed the fire had spread, because

1 initially, if you remember, when I was mobilised, it was
2 a single flat on the 9th floor, and then when I walked
3 round I saw five separate areas of fire.

4 Q. What you've written is that:

5 "... there were people involved but he did not know
6 the numbers."

7 Do you think that's numbers of people or numbers of
8 flats?

9 A. That would be both. So he didn't know the exact
10 locations or how many.

11 Q. At that moment in time, were you aware that people were
12 trapped?

13 A. Not specifically as in flat numbers, but I anticipated,
14 because of the amount of smoke being given off, that on
15 the floors above the fires there would be people who
16 couldn't come out because of the amount of smoke in
17 corridors, and that's from experience of dealing with
18 high rise fires in the past.

19 Q. So if one looks, for example, in the sequence of events
20 at 16.51, the photograph on page 18.

21 A. I've got that, sir, yes.

22 Q. You would have had a view like that whilst you were with
23 Mr Howling; is that right?

24 A. That's correct, sir.

25 Q. Based on your experience, where would you think that

1 people might be trapped in the sense of unable to get
2 out of their flats?

3 A. On all floors from 5 upwards, although by -- by
4 "trapped", it would just mean -- it could mean smoke in
5 the corridor and somebody opening the door and deciding
6 they don't want to come out. It doesn't necessarily
7 mean they couldn't physically leave the property.

8 Q. Looking at that photograph, would you identify any
9 particular corridor as posing greater risks for
10 occupants than any other?

11 A. At that stage, no, because I didn't know if -- I didn't
12 know if the fire had breached from the compartments.

13 Q. You told us that you weren't aware of flat numbers?

14 A. No, sir.

15 Q. But your recollection, as you told us, is that you knew
16 from the very early stage that persons were reported?

17 A. That's correct, sir, yes.

18 Q. What did that mean to you?

19 A. All that "persons reported" means is that there is
20 a likelihood that there will be people in the building
21 which will be affected by this fire who may need
22 rescuing. It's also an administration message and
23 control use it to mobilise additional resources.

24 Q. In your conversation with Watch Manager Howling at this
25 stage, this initial conversation, was there any

1 discussion about whether there were people trapped?

2 A. Only along the lines that he -- he knew there were
3 people involved but, as I said, he didn't know where and
4 they were carrying out firefighting and rescue
5 operations from the bridgehead.

6 Q. Was there any discussion about flat numbers?

7 A. No, sir.

8 Q. What impression did you have about the extent to which
9 he knew and had ever known about individual flat
10 numbers?

11 A. He never mentioned it and I -- he may well have done,
12 but he didn't -- it wasn't mentioned at the time.

13 Q. Just for completeness, when you gave your second witness
14 statement in April 2010, that is essentially what you
15 said. You said you weren't aware of any flat numbers at
16 this point, and at the time of taking over from Watch
17 Manager Howling, he confirmed that there were people
18 involved but had no idea how many or where.

19 A. That's correct, sir.

20 Q. Returning to your note at the bottom of 119, the final
21 sentence says:

22 "I told him that as an immediate priority he was to
23 move the bridgehead from the 7th floor to the 3rd floor
24 to prevent crews inside from being cut off by the fires
25 that had broken off below them (as per standard

1 operational procedures)."

2 A. That's correct, yes.

3 Q. So that was your decision?

4 A. I was the incident commander at that stage. That was my
5 decision.

6 Q. How soon after you'd arrived at Mr Howling's side did
7 you take that decision?

8 A. I can't recall the exact sequence of the briefing but it
9 would have been -- talking about the size of the
10 building and what was going on, probably about 45
11 seconds to a minute into the briefing. That's when he
12 said, "We're working from the bridgehead on the 7th
13 floor." I looked at the fire, saw that it was now on the
14 5th, and that's when I gave the order to move it.

15 Q. What would you expect to happen as a result of giving
16 that order?

17 A. I told him to do it, because he was in communication
18 with it, and I would have expected it to be done by
19 radio, and if they couldn't get through on radio, to
20 have sent a runner, and the bridgehead commander, who
21 I had been told was Watch Manager Payton, it would have
22 been his -- first of all, I need to explain this is not
23 an unprecedented move. I'm not aware of a bridgehead
24 ever moving before, so it's not something we would have
25 practised. But from the bridgehead commander, he would

1 have informed the people who were with him, and also
2 a message would have been passed to all BA crews that
3 had been committed that the bridgehead was now going to
4 be relocated and I told it to relocate to the 3rd floor.

5 From the communications between the bridgehead
6 commander and the BA teams, depending on what the
7 conditions were inside the building, which I didn't know
8 at that stage, a decision would have been taken whether
9 to leave the crews in BA firefighting on the 9th floor
10 or whether they were to withdraw at the same time as the
11 bridgehead. So that decision would have been made from
12 the bridgehead commander who was inside the building.

13 Q. That's the bit that I'm interested in. Is your evidence
14 that it would be at the discretion of the bridgehead
15 commander what orders to give to crews who were
16 committed in breathing apparatus above the bridgehead at
17 that time of the decision to move the bridgehead down?

18 A. That's correct. If I wanted everybody to move, the
19 instruction would have been: "Withdraw all personnel to
20 the 3rd floor." The instruction I gave was to move the
21 bridgehead, and the bridgehead is the entry control
22 part, any reserve crews that have not been committed and
23 the bridgehead commander and his team. It's not to
24 remove the BA teams that have been committed.

25 Q. Whom did you give that instruction to?

1 A. Watch Manager Howling.

2 Q. Who, in the event, was then tasked with carrying out
3 that withdrawal of the bridgehead?

4 A. He passed a radio message to Watch Manager Payton, who
5 was the bridgehead commander, and then shortly after
6 I gave that instruction a -- the first station manager
7 to arrive was Station Manager Guy Foster, and he told me
8 he was a press officer and I reallocated him a task as
9 sector commander fire, and I told him as a matter of
10 priority to make sure that the bridgehead moves to the
11 3rd floor.

12 The reason I gave that to him as well is because I'm
13 aware from previous experience that once firefighters
14 begin firefighting, particularly when people are
15 involved, they are very reluctant to move, even to the
16 extent that they will put themselves in quite serious
17 risk.

18 Q. So just going to what you said there for a moment,
19 Station Manager Guy Foster arrived, and you made him
20 sector commander fire?

21 A. That's correct, sir.

22 Q. Would you just explain to the members of the jury what
23 that means?

24 A. Okay. I explained earlier what sectorisation is.
25 Sector commander fire would be the officer who would be

1 directly responsible for the firefighting tactics inside
2 the building, and that would be the area around the
3 bridgehead, the floors immediately above and below it,
4 and at that stage any rescues that were gonna take part.
5 But I must clarify it was not a detailed briefing due to
6 the time constraints. It was a very quick briefing.

7 Q. I was going to come to that. That's what you say in
8 your note at the top of 120. You say in the fourth
9 line:

10 "I told him that he was now sector commander fire
11 and he was to immediately organise the relocation of the
12 bridgehead. I cannot remember what else I told him as I
13 was concerned about the bridgehead being compromised.
14 He confirmed that he knew what was required from my
15 limited brief to him and left to carry out those
16 instructions."

17 A. That's correct, sir, yes.

18 Q. So those instructions were silent on what the crews
19 currently committed above the bridgehead should do; is
20 that right?

21 A. That's correct, sir, yes.

22 Q. Is it your evidence that he would interpret something
23 into that silence and into the fact that you didn't say
24 to him: "Withdraw all crews"?

25 A. Okay, as senior officers, apart from experience gained

1 from real incidents, we regularly attend command
2 exercises which would involve being in charge of various
3 sectors, and it would be -- we would -- we would have
4 the prior knowledge and understanding of what the sector
5 would do and what you'd be required to do, and it was
6 fairly -- in a certain sense, it was fairly obvious.
7 Again, a certain terminology we use. If I'd said,
8 "Withdraw all crews", that meant withdraw everybody, and
9 if I said, "Withdraw the bridgehead", that would mean
10 a specific part of the crews inside the building, and it
11 would have been those people because they would not have
12 had the protection of breathing apparatus, and my
13 concern was -- well, I knew from the amount of smoke
14 being given off and where the fires were, again, from
15 previous experience of high rise fires, that very
16 quickly the staircase and the corridors would be
17 compromised as people were evacuating from their flats
18 and also from our firefighting tactics, which meant we
19 would open up the staircase as we took our hose through
20 to fight the fires. So it wasn't a question of "if"; it
21 was more when that was going to happen.

22 THE CORONER: At your regular command exercises, do you
23 practise moving a bridgehead from one location to
24 another?

25 A. No, madam. We have never moved a bridgehead. In my

1 experience, a bridgehead has never, ever been moved from
2 the initial position it's set up in a incident.

3 THE CORONER: Not even in your exercises?

4 A. Not even in our exercises. If I can just go onto that,
5 the reason we don't move bridgeheads is 'cos we've never
6 had a fire which has moved downwards before.

7 THE CORONER: Yes, I see. Thank you. Yes.

8 MR MAXWELL-SCOTT: Given what you've said about this being
9 an unprecedented event, the moving of the bridgehead, in
10 your experience, can you be as fair as you can be to
11 Station Manager Foster in saying whether you would have
12 expected him to infer from the fact that you didn't say,
13 "Withdraw all crews" that it remained open to him to ask
14 the crews committed above the bridgehead to continue
15 carrying out tasks using the air available to them?

16 A. That would be correct, yes.

17 Q. Can one have something called a sector commander
18 rescues?

19 A. You can have a sector commander whatever you deem is
20 necessary.

21 Q. Sometimes one has one for rescues; is that right?

22 A. Well, they -- they can have various terms. It can
23 either be sector commander rescue or sector commander
24 search. Essentially, they're doing the same job.

25 Q. That wasn't something that happened at this stage of the

1 incident.

2 A. No, the sector commander specifically for coordinating
3 the searches or rescues was Station Manager Glenny, who
4 arrived very shortly after Group Manager Freeman.
5 However, it would have been taken that the group manager
6 who's in charge of the fire sector would have dealt with
7 that until further officers arrived to support them.

8 Q. You mean Station Manager Foster?

9 A. Yeah, Station Manager Foster, who was sector commander
10 fire, until further support officers arrived, he would
11 be responsible for coordinating any rescues and that
12 would be from inside the building. Outside the
13 building, it would be my job.

14 Q. If you could have a look in the policy on sectorisation
15 starting at page 1620, file 4 of the advocates' bundles.

16 A. If I read it off the screen it would be easier, sir.

17 Q. You can read it off the screen, absolutely. What I want
18 to take you to is a point at page 1624 where you'll see,
19 about two thirds of the way down the page, there is
20 a heading, "Vertical sectorisation". At paragraph 5.9,
21 you see that it may be used at incidents involving high
22 rise buildings, and then at 5.12, it says:

23 "Where there is one or more internal sector within
24 the structure, the physical areas could be identified as
25 in the following examples."

1 Firstly a fire sector, secondly a search sector, and
2 thirdly a lobby sector. Then at 5.12, says:

3 "The following diagrams show examples of how these
4 principles may be applied to high rise and basement
5 scenarios."

6 Over the page, you see figure 3, a diagram showing
7 vertical sectorisation applied to a high rise scenario.
8 All I wanted to draw your attention to was the fact that
9 as I understand it, it is possible in some circumstances
10 to set up a search sector above the fire sector. Is
11 that right?

12 A. That is correct, sir, when you have sufficient officers
13 to put that in place. I'd also like to point out that
14 the amount of floors that were now alight -- virtually
15 the whole of Lakanal House was a fire sector.

16 Q. You told us that you made this decision within the first
17 45 seconds or minute of your briefing from Watch Manager
18 Howling, but also that you had formed the view that
19 there was a real possibility of casualties in this
20 incident. If I could just refer you to a couple of
21 points you made in your second witness statement in that
22 regard. So statements bundle 306. It's the end of the
23 third paragraph. You say:

24 "Moving the bridgehead down is a last resort because
25 of the serious safety implications which it has for

1 crews in breathing apparatus, but I felt this was less
2 of a risk than having the bridgehead cut off completely.
3 I also recognised the serious impact this would have on
4 firefighting and rescue operations."

5 Was that your thought process at the time?

6 A. It was, sir, yes.

7 Q. When you say you recognised the serious impact this
8 would have on firefighting and rescue operations, did
9 you envisage the likelihood that there would be a period
10 of time when there were no crews being committed into
11 the building because of the delay associated with having
12 to reestablish the bridgehead?

13 A. The -- it wasn't so much that there wouldn't be any
14 crews committed in the building but I knew that all
15 crews -- certainly if it was gonna go down to a 3rd
16 floor, I knew that all crews would now have to make
17 their way up with their limited duration BA, and
18 carrying all their equipment, from the 3rd floor up to
19 the higher floors, which would take a great deal of time
20 and also use up a lot of valuable air, and what this
21 would mean is that when the crews did arrive at the
22 scene of operations they could only be there for
23 a limited amount of time before they would need to be
24 replaced.

25 Q. On page 307, over the page, just towards the bottom of

1 the page in that final paragraph, we see about four
2 lines down you said in your second statement:

3 "My thoughts were that the fire was spreading and
4 I was expecting that there would be injuries and
5 possibility fatalities."

6 A. That's correct. Seeing the speed of the fire and
7 knowing fire spread and smoke from previous fires I've
8 been to, because of the -- as I say, the rapid fire
9 spread and the size of this incident, I was anticipating
10 that there would be injuries and fatalities, not only to
11 the occupants but quite possibly to fire crews.

12 Q. That was a view you formed very soon after arriving at
13 Mr Howling's side?

14 A. As soon as I moved the bridgehead, I knew -- I had
15 a very reasonable idea of what was likely to happen.
16 However, we needed to be inside the building and we
17 needed to fight that fire, and the only way we could put
18 it out was from inside the building.

19 Q. The central staircase would be a protected firefighting
20 shaft; is that right?

21 A. Only until such time as people started opening the
22 doors.

23 Q. So even that fact, in your view, wouldn't remove the
24 necessity of moving the bridgehead out of the building?

25 A. My understanding -- my belief was -- and again, this is

1 from experience of -- brigade experience as well as my
2 own -- is that if you set the bridgehead up two floors
3 below the fire floor, normally it will be in safe,
4 clear, air. However, in these circumstances, I think
5 because the bridgehead was slightly delayed in moving,
6 by the time it did move, the staircase was virtually
7 completely full of smoke.

8 Q. I think you're absolutely right. You wanted it to move
9 to the 3rd floor.

10 A. I did want to move it to the 3rd floor.

11 Q. But the people tasked with doing that, in their
12 discretion they decided to move it to the ground floor?

13 A. That's correct, sir.

14 Q. Coming back to the crews still committed in breathing
15 apparatus at the time of your decision, you would have
16 been willing for the officer in command of the
17 bridgehead to task them, for example, with trying to
18 bring out with them as they came down residents, to
19 rescue them and reduce the number of residents who would
20 need rescue later?

21 A. That would be correct, sir, yes. Anybody who could be
22 easily rescued I would expect to have been brought out
23 from the building as the bridgehead withdrew.

24 Q. It is not, in fact, the case, but if, for example,
25 a crew had just been committed and had 20 minutes' air

1 supply, you would expect them to make as much use of it
2 as they could to rescue people on their way out?

3 A. Yes, I would -- if they were coming down the building
4 and people were nearby, I would expect them to bring
5 them out.

6 Q. That's not a specific instruction you gave?

7 A. It's not -- it's not the specific instruction, but as
8 fire crews we all know that our main, primary task is to
9 rescue people.

10 Q. You would expect something like that to happen, if
11 possible, without you giving an express instruction; is
12 that right?

13 A. Yes, I would expect the firefighters to use their own
14 initiative. In fact, many rescues are carried out
15 without any instruction from officers.

16 Q. In your second witness statement, you mentioned that it
17 was confusing why there was fire spreading to the lower
18 floors and you felt that the fire was spreading
19 internally. Did you have any conversation with Watch
20 Manager Howling or anyone else as to what had happened
21 before your arrival to cause the fire spread as far as
22 they could tell?

23 A. When I -- when I arrived, I could see burning material
24 in front of the building and there was burning material
25 still falling from the upper floors. However, I do know

1 from experience that some buildings do have internal
2 voids and fire can spread rapidly inside those internal
3 voids. It wasn't immediately apparent how this fire was
4 spreading around the building.

5 Q. Did you ask Watch Manager Howling?

6 A. I can't remember if it was Watch Manager Howling. I do
7 vaguely remember somebody saying there was stuff falling
8 down the front of the building. However, I couldn't be
9 100 per cent certain what was causing this fire to
10 spread, and to a certain extent, once the flats were on
11 fire it was fairly immaterial. We still had to put the
12 fires out.

13 Q. Can I ask you then about whether there came a time when
14 you were aware specifically of occupants in flat 81,
15 firstly by reference to number. Is that a number that
16 was drawn to your attention when you were incident
17 commander?

18 A. No, it wasn't.

19 Q. When you were operations commander?

20 A. No, it wasn't, no.

21 Q. If I then ask you about it not by number but by
22 location. So if you look at the photograph at 16.51 on
23 page 18 of the sequence of events. If you see the
24 highest flat on fire in the building, where you can see
25 some red flames.

1 A. Yes, I've got that, yeah.

2 Q. That is on the 11th floor, and there are then six
3 windows on that corridor. If you see the middle two
4 windows in that corridor, do you recall, while you were
5 incident commander, your attention being drawn to events
6 in a flat where those windows were?

7 A. No. The only flat number I knew was flat 65, and that
8 was the one on the 9th floor that was alight. I did not
9 know the internal numbering of the building at that
10 stage.

11 Q. I understand that. That's why I'm asking you by
12 reference to what you could see from outside the
13 building.

14 A. I don't recall seeing specific people appearing. They
15 did -- during the time I was there, people did appear at
16 windows, but I couldn't recall exactly what windows they
17 appeared at.

18 Q. If you look very carefully at that photograph. The
19 fourth window from the left of the building, do you see
20 there are then three window panes?

21 A. I've got that, sir, yes.

22 Q. In the right hand of those three do you see something
23 blue? I appreciate it's difficult.

24 A. I don't see that, no, sir.

25 Q. Just stay with me for this question. I'm going to show

1 you another photograph taken at 17.02. My white arrow
2 is looking at the same window that I was pointing out to
3 you before. The reason I'm pointing it out to you is
4 because others who looked at this photograph take the
5 view that in the first one you can see curtains and
6 something blue, which is a blue mattress, and in the
7 second one you can't. We've heard evidence that that is
8 because Mr Rafael Cervi called his wife
9 Dayana Francisquini, and on his instruction she moved
10 very quickly to the window, pulled down the curtains and
11 pulled away the mattress, and we've heard that others
12 saw this happen. Is that something that you remember
13 seeing?

14 A. No, sir. My position -- if you look at your photograph
15 on 18, I probably would have been where that single tree
16 is, which would have been fairly close to the building,
17 looking up at it. There was thick smoke blowing across
18 the front of the building and I did not see -- I don't
19 recall seeing anybody appear at any windows.
20 Specifically that window, no.

21 Q. Do you remember anyone commenting that that had
22 happened?

23 A. No, no, sir.

24 Q. Or about a black man coming to that window and opening
25 it momentarily?

1 A. There were people by windows. I can't recall exactly
2 where they were.

3 Q. After you had ordered the bridgehead to be withdrawn and
4 you were faced with this situation that you've described
5 for us, what was your plan?

6 A. Well, my plan was that -- once the bridgehead moved, the
7 dynamics of how to fight this fire changed. The only
8 way we could stop -- or suppress the fire, because
9 I knew it was going to take a long time for crews to get
10 up to various floors to fight the fire, was by using
11 aerial appliances. I had one parked up in
12 Dalwood Street. I'd spoken to Watch Manager Howling.
13 Initially, it didn't get deployed, partly due to the
14 fact that the front of the building was disintegrating,
15 it was on fire and they couldn't use it, and also
16 because of the way -- there was privately owned vehicles
17 parked in the road and there was also a fire appliance.

18 Once the bridgehead moved, from my -- all I can
19 remember is that the front of the building was no longer
20 falling down and it was then going to be possible to put
21 an aerial up, although all it would have been able to do
22 would be to reduce the fire spread -- it would not have
23 been able to put the fires out -- or possibly carry out
24 rescue, depending upon where people were in that
25 building.

1 Q. Up to what height would you have expected it to have
2 been used for rescues?

3 A. If it could get very close-up to the building, it could
4 have got up to the 10th floor. That depends -- that's
5 only if it's directly above where the aerial ladder
6 platform is. If the flats are further away, then as the
7 aerial ladder platform moves it then reduces in height.

8 Q. Just going back to the photograph at 16.51, the sequence
9 of events. You've told us that the only flat number
10 that you had was 65, where the fire had started; is that
11 right?

12 A. That's correct, sir, yes.

13 Q. Did somebody tell you which flat was flat 65 as you
14 looked up at the building?

15 A. No, I knew that flat 65 was the flat that was on fire
16 from the 9th floor from my original mobilising. That
17 was the only flat that I could see that was on fire on
18 the 9th floor, and so I assumed that was 65.

19 Q. Was there any discussion about the numbers of the other
20 flats that were visibly on fire?

21 A. No, sir.

22 Q. Whilst you were incident commander, did you commit any
23 crews into the building?

24 A. No, sir.

25 Q. Turning now to the time when Group Manager Freeman

1 became incident commander, I'm going to try and work out
2 with you firstly when that may have been. My first
3 question on the topic is this: how soon after he found
4 you did he tell you that he was taking over as incident
5 commander?

6 A. Probably within about a minute or so.

7 Q. If we look in the advocates' bundles at page 934, which
8 is in file 3. (Handed) The writing is very small on
9 the screen -- it's better on the page -- but on the
10 bottom third of the page there's a list of people
11 mobilised. It indicates also when they arrived by call
12 sign. Group Manager Freeman is E111. He's down as
13 arrival, 16.57, and Station Master Glenny, whom you've
14 already mentioned, is down as arriving also at 16.57.
15 He is OE70.

16 Obviously he wouldn't have come immediately to you
17 the second he arrived, but if I then ask you to have
18 a look at 399 in the same series of bundles. I'm
19 looking now at the top box, radio traffic at 17.04.43,
20 which is a message sent by command unit 4.

21 A. I've got that, sir, yes.

22 Q. It says:

23 "Command unit 4 from Station Manager Cartwright at
24 Lakanal, Havil Street, SE5. Make pumps 12, aerials two,
25 over."

1 What I wanted to ask you is whether it was you who
2 gave that order or whether it was Group Manager Freeman?

3 A. No, that was Group Manager Freeman. He'd taken over at
4 that stage.

5 Q. So by 17.04, what was happening in reality on the fire
6 ground is that Group Manager Freeman had become incident
7 commander?

8 A. That's correct, yes.

9 Q. Although the message to that effect was not sent for
10 another 15 minutes, until 17.19?

11 A. That's correct, sir, yes.

12 Q. If we just look at what you said about this in your note
13 on 4 July at page 120. In the second paragraph, you
14 said:

15 "As this was taking place, Group Manager Freeman
16 (E111) arrived and asked me for a situation report.
17 I told him that I'd only just arrived myself and passed
18 on the few bits of information I had managed to obtain
19 from Watch Manager Howling and that I was having the
20 bridgehead moved. I called Watch Manager Howling over
21 to brief both myself and Group Manager Freeman. Before
22 this took place, Group Manager Freeman said that he was
23 now taking over and told the CU operator who was still
24 with us to inform control of the change of incident
25 commander and to make pumps 12, ALPs two. The CU

1 operator confirmed he had heard the instruction and
2 asked for the GM's name and left the scene to return to
3 CU4."

4 Is that still your recollection?

5 A. That's correct, yes.

6 Q. The evidence we have indicates that Deputy Assistant
7 Commissioner Chidgey arrived at 17.12. Do you remember
8 him arriving?

9 A. No. I met up with him when I became sector commander
10 though. I was asked by Group Manager Freeman to go and
11 give him a brief in the command unit.

12 Q. When you were sector commander?

13 A. Yes.

14 Q. So after you'd ceased being operations commander?

15 A. That's correct, yes.

16 Q. Is it right that Group Manager Freeman, on taking over
17 as incident commander, made you the operations
18 commander?

19 A. That is correct, yes.

20 Q. So that was the point when you ceased being incident
21 commander, and at that stage you don't recall having
22 specific flat numbers?

23 A. That is correct. I did not have any specific flat
24 numbers.

25 Q. Were you aware that a list of numbers had at any time

1 been passed to the bridgehead?

2 A. No, I wasn't.

3 Q. Were you aware of any particular flats where occupants
4 required rescue?

5 A. No, sir.

6 Q. I'll just take you to a couple of points on that in your
7 second witness statement at page 307, firstly, in the
8 witness statements bundle. In the third paragraph, the
9 question was:

10 "What would have been your thoughts if you had been
11 aware of a list of flat numbers?"

12 Your answer in April 2010 was:

13 "Even if I had a list of flats, if the flats had
14 been on the 11th floor, we would not have been able to
15 get there as there were crews only fighting the fire on
16 the 9th floor and we had to get the bridgehead moved
17 below the fire floors. At that stage, I did not know if
18 it was just one flat alight on each floor or the whole
19 corridor alight on each floor. It was also not known
20 that the flats were over two floors."

21 Do you remember when you first learned that they
22 were over two floors?

23 A. When I went in the building after 8 o'clock at night.

24 Q. "Also I could have had a list of flat numbers, sent
25 crews to a particular flat, only to find they had

1 self-evacuated."

2 In other words, they might have turned up and found
3 the flat empty?

4 A. That's correct, sir, yes.

5 Q. Then you said:

6 "It would be more relevant if we were informed by
7 control that a person was still on the line."

8 Can you perhaps explain why that would be more
9 relevant?

10 A. The reason it would be more relevant is if control was
11 still talking to the occupant then we knew they were be
12 in the flat. So if we dispatched a BA crew there, we
13 knew they would be finding somebody to rescue. The
14 reason being that we had a limited amount of resources
15 at that time and we could have been sending crews round
16 that building to break into flats and to find out they
17 were now empty, and again, that would have been using
18 valuable air up and valuable resources.

19 And also, as I said earlier, I've dealt with
20 probably several dozen high rise fires, and the vast
21 majority of those high rise fires have always had calls
22 to control saying people are trapped in upper floors who
23 have not actually been trapped, because they either
24 self-evacuated or when we reached there, there wasn't
25 a great deal of smoke there.

1 Q. Just looking on to page 310. The second question refers
2 to flat 79 and the fact that the occupant had been in
3 constant contact with the brigade operator, and you were
4 asked:

5 "Were you aware of this at any point?"

6 And you said:

7 "No, I was not aware of this."

8 A. That's correct.

9 Q. If I refer to you a message passed to brigade control
10 now at 17.11 at page 540 in the advocates' bundles. At
11 this time, would I be right in thinking that you were
12 the operations commander?

13 A. That would be correct, yes, sir.

14 Q. So we see here command unit 4 in the middle of this
15 confirming:

16 "We here are aware of people in the flour flats: 68,
17 79, 82, 80."

18 But you weren't aware of that at that time?

19 A. That's correct, sir. That message was not passed to me.

20 Q. You weren't aware of any of those flats whilst you were
21 operations commander?

22 A. No, sir, I didn't know of the flats.

23 Q. Do you recall hearing anything about flat 81 from Watch
24 Manager Paffett shortly after 5 pm?

25 A. I don't, sir. I was asked that question. As operations

1 commander, normally I would be running that incident on
2 behalf of Group Manager Freeman. However, very shortly
3 after taking that role, I then became involved in
4 an attempted rescue from the back of the building, or
5 the east side of the building.

6 As I said in the answer, if Watch Manager Paffett
7 had approached me -- and I cannot say whether he did or
8 not -- I would have directed him to the sector commander
9 fire, as it would have been Station Manager Foster's
10 role to carry out rescues.

11 Q. You're absolutely right; you were asked about that in
12 your second witness statement, and you said you didn't,
13 at that time, remember Watch Manager Paffett saying
14 anything to you about flat 81.

15 A. That's correct.

16 Q. The events on the east side of the building you are
17 referring to -- if you look in the sequence of events at
18 page 23. That's a photograph taken at 17.09. Does that
19 refresh your memory of what you saw on the east side of
20 the building?

21 A. Yes, sir. I was round the west side of the building and
22 a watch manager came round to tell me that people were
23 getting ready to jump from the other side of the flats.

24 Q. The court has heard evidence that Ed Daly of the London
25 Ambulance Service was, from time to time, in telephone

1 contact with Dayana Francisquini in flat 81, his first
2 call to her on his mobile being at 16.47. Is that
3 something that you were informed about at any time?

4 A. No, sir.

5 Q. I now want to move on to ask you about knowledge that
6 you gained of certain features of Lakanal House whilst
7 either incident commander or operations commander.

8 A. Okay, sir.

9 Q. So firstly, were you aware that there was no central
10 corridor on even-numbered floors?

11 A. Not at that time, sir, no.

12 Q. Were you aware that the flats were all maisonettes?

13 A. No, not at that time, sir.

14 Q. Were you aware that on the upper floors of each flat
15 they extended the full width of the building, therefore
16 having windows on the east side and windows on the west
17 side?

18 A. Not at that time, sir, no.

19 Q. Were you aware that the balconies on alternate floors
20 provided escape routes via the central staircase?

21 A. No, sir.

22 Q. Just looking at that in a little more depth and looking
23 at a photo of those balconies from the outside, back now
24 on photograph 44, which is not an identical view to the
25 one you had but it's not taken from all that far from

1 where you were standing, is it?

2 A. No, sir, that's correct.

3 Q. From where you were standing, you could see balconies on

4 alternate floors, couldn't you?

5 A. I could, yes.

6 Q. And could you see, as one can see in this photograph and

7 the close-up on 45 which I'm now showing you, that at

8 least at upper body level the balconies were not

9 partitioned?

10 A. From upper body level, I can see they're not

11 partitioned, yes, sir.

12 Q. And from this photograph you can see a door at the end

13 of the balconies, a white door. Could you see that from

14 where you were?

15 A. I don't recollect seeing doors, sir, no.

16 Q. Do you recollect thinking about what function those

17 balconies had?

18 A. From previous experience of going into high rise

19 buildings, a lot of residents have balconies similar to

20 that but they've got partitions, and it's their own --

21 it's where they put their flower pots, they put their

22 bikes out there, their own little area. I wasn't aware

23 that that actually ran the whole length of the flats

24 without any partitions.

25 Q. Okay, what I asked you is whether you thought about what

1 the function of those balconies was.

2 A. No, sir, I did not.

3 Q. Can you tell us why not?

4 A. Because as I said, from previous experience my -- having
5 seen balconies, not -- or balconies with flats, they're
6 normally individual balconies for a specific flat.
7 They're not use for transiting from one side of the
8 building to the other. I'd never seen an escape balcony
9 like that before.

10 Q. The image I've just put up on screen is the view of the
11 west side of Lakanal House from ground level, showing
12 the floor numbers but not the flat numbers. What I'm
13 going to do now is I'm going to place over that the
14 correct flat numbers. What I'd like to ask you is
15 whether, at any time when you were incident commander or
16 operations commander, you began to build up a mental
17 picture like that of where flat numbers were in the
18 building?

19 A. The only flat number I knew was 65 on the 9th floor.

20 Q. Is it your evidence that that remained the case until
21 you ceased being operations commander?

22 A. That's correct, sir, yes.

23 Q. Were you aware, at any time whilst incident commander or
24 operations commander, of the presence of signs within
25 the building that might assist one to identify where

1 flat numbers were in the building?

2 A. I didn't personally go inside the building, but again,
3 from previous experience, I would expect there to be
4 signage inside the building detailing what flats were on
5 individual floors, yes.

6 Q. If I show you a photograph, you can tell me whether
7 that's the sort of thing that you would have expected.
8 This is ground floor level, the lift lobby. You can see
9 two lift shafts and a sign above the lifts. This is
10 photo 7. If I then zoom in to the sign, photo 8, that
11 is what one sees. Is that the sort of sign, from your
12 evidence a moment ago, you would have expected to find
13 within the building?

14 A. Yes sir, that's a very common sign.

15 Q. At ground floor level?

16 A. At ground floor level, normally by the lifts, or if it's
17 got an answerphone system it would be by that.

18 Q. Do you remember ever having any discussion or
19 overhearing any discussion about whether anyone had
20 looked for such a sign and found it?

21 A. I don't remember having any discussion, no, sir.

22 Q. Or overhearing one?

23 A. Or overhearing one.

24 Q. My final question is this: looking back over your
25 involvement on the day of the fire as incident commander

1 and operations commander, what single additional thing
2 do you think would have most helped you to carry out the
3 tasks that it fell to you to carry out?

4 A. I think if it had a thing called a premises information
5 box, which we have outside buildings, where it would be
6 easily identifiable where it was, and inside there would
7 be detailed plans of the building. The reason I say
8 that is because the amount of high rise buildings we
9 have in London, it would be unrealistic to expect crews
10 to have a good knowledge of all the buildings on their
11 ground, and there's no guarantee that the first crews to
12 arrive at a building would be from that local station.

13 Q. Thank you very much. Those are my questions, but
14 there'll be questions from others.

15 A. Thank you sir.

16 THE CORONER: Thank you. Mr Hendy.

17 Questions by MR HENDY

18 MR HENDY: Mr Cartwright, my name's Hendy and I represent
19 some of the bereaved. Can I ask you first of all about
20 the command unit when you arrived. As I understand it,
21 you arrived at about 16.52, or thereabouts?

22 A. That's correct, sir, yes.

23 Q. And you went straight to the command unit?

24 A. That's correct, sir, yes.

25 Q. At that point you hadn't taken over from Watch Manager

1 Howling?

2 A. No, sir.

3 Q. We know from the sequence of events that the command
4 unit arrived at 16.38.33. No-one needs look it up, but
5 it's in the jury bundle at divider 12 at page 6. So it
6 looks as if you arrived about 14 minutes or 13 and
7 a half minutes after them. I got the impression from
8 your evidence that you were surprised at the little that
9 they'd accomplished in their time there; am I right?

10 A. That's correct, sir, yes.

11 Q. Because you thought that they would have already had
12 a plan of the incident, yes?

13 A. That's correct, yeah. I would have thought they'd have
14 had a rough outline of what was going on.

15 Q. Yes, you don't mean an ordinance survey. Just a sketch
16 map?

17 A. Just a hand-drawn map.

18 Q. Describing really what the scene was so that they could
19 communicate with incident commanders as they came?

20 A. That's correct, sir, yes.

21 Q. They hadn't done that. You also thought that they would
22 have set the computer up. Just tell us a little bit
23 about the computer in the command unit?

24 A. They have a system called the command support system,
25 and what that does, that links into brigade control so

1 it would come up -- it would have a map of the incident,
2 so you knew exactly what it was. It would tell you
3 where all your hydrants were. It wouldn't give you
4 specific information about the building unless we'd had
5 a particular risk on it, and they would also have a
6 record of all the messages being sent from the fire
7 ground and to the fire ground.

8 THE CORONER: Sorry to interrupt, but you are you describing
9 the situation as it was in 2009?

10 A. That's correct, yes.

11 THE CORONER: Thank you.

12 MR HENDY: When you say they'd have a record of the
13 messages, would they have a record of the radio messages
14 or simply those that were transmitted by -- well,
15 I don't know. You tell me.

16 A. They would have a record of all main scheme radio
17 messages between control and the fire ground, and fire
18 ground back to control. They would normally -- if
19 I explain what happens. As soon as they arrive, one
20 person will start setting up the vehicle. It may have
21 a crew of two or three. The second person would go and
22 meet immediately with the officer in charge of the
23 incident and they would start collating information
24 about the incident. Any record of any messages that
25 have been sent which the radio operator had from the

1 fire appliance would be handed over to the command unit
2 operator. If they'd already made a sketch of the
3 incident -- because they have these things called
4 initial command wallets -- that would also be handed
5 over to the operator for them to transpose that onto
6 their command unit systems, and from that they would
7 then go back up to the command unit and start setting
8 the command unit up.

9 Q. Just help me with this. When messages come to the
10 command unit from control -- we have transcripts of the
11 radio broadcast that was obviously all word of mouth.
12 Would they have that typed onto their screen? Would
13 they type it or would control type it?

14 A. The messages going over the main scheme radio would be
15 typed onto the system by control officers.

16 Q. Do they type it as they speak it or immediately
17 afterwards, or what?

18 A. Well my understanding, having spoken to them on the
19 radio, you can hear them actually typing the information
20 as you you're talking to them. Sometimes they might ask
21 you to repeat something.

22 Q. Of course. Well, we can ask them when they come. So
23 had the computer been set up, it would have had all the
24 messages from control which had been broadcast by radio
25 and which, as you understand it, the control officers

1 would have typed up as they broadcast those messages?

2 A. That's correct, sir, yes.

3 Q. What was the state of the computer, then? Was it just

4 dead or were they in the process --

5 A. I don't believe it had been turned on at that stage. It

6 may have been but the screen wasn't up and running with

7 messages.

8 Q. You described seeing Watch Manager Best -- as I recorded

9 your evidence, you said he was sweating profusely?

10 A. That's correct, sir. He was the command unit officer

11 who'd been on the fire ground.

12 Q. Is there some message in there that we should glean from

13 that? It was obviously a hot day but was --

14 A. It was a hot day, but also they had a 50-metre walk down

15 to the fire ground and back again, and as I was talking

16 to him and asking him questions, he was indicating that

17 I actually needed to go and see this incident, which to

18 me meant that it was quite serious.

19 Q. What you've written in your statement -- can we just

20 look at it. 303, the last paragraph on the page. You

21 say:

22 "When I went on the command unit ... Established

23 they were setting it up ... thought they would have had

24 a plan of the incident and the computer set up. They

25 hadn't done these yet. There was an officer in fire

1 gear, who I think was Watch Manager Best. He was
2 carrying a selection of tabards. The second crew member
3 was managing the handheld radio, main scheme radio, and
4 booking teams in."

5 Then a sentence later, you say:

6 "They appeared overwhelmed with the amount of
7 information which was coming in. I asked for the
8 messages from the incident which had been sent but they
9 didn't have them."

10 And you've told us about that. Watch Manager Best
11 was carrying a selection of tabards, and the tabards are
12 to designate the roles to be fulfilled by various
13 officers, yes?

14 A. That's correct, sir, yes.

15 Q. Did you remonstrate with them that they hadn't got
16 a plan and the computer set up?

17 A. No, sir. I didn't feel that was the time to do it.

18 Q. It wouldn't have been helpful at that stage?

19 A. They was under enough pressure already without me adding
20 to it.

21 Q. Watch Manager Best told you to go and have a look and
22 you asked him to accompany you?

23 A. That's correct, sir, because I didn't know -- as I said,
24 at that stage when I turned up at the incident, I didn't
25 know where Lakanal was. I was expecting to see large

1 volumes of smoke and possibly fire, and I couldn't see
2 it. So I didn't know exactly where they were and what
3 building was involved, so I asked Watch Manager Best to
4 take me down there so he could take me to Watch Manager
5 Howling who he'd been to see already.

6 Q. He stayed with you and Mr Howling for some period, did
7 he?

8 A. He remained there up until the time that
9 Group Manager Freeman told him to send the message of
10 make pumps 12.

11 Q. So for that period, his colleague on the command unit
12 was operating single-handedly?

13 A. That's correct, sir, yes.

14 Q. You must have assumed that the command unit had no
15 chance of fulfilling its proper function in that case?

16 A. I would understand that to be the case. However, the
17 reason the command unit officer stayed with us is
18 because of radio traffic and we knew that we couldn't
19 pass these messages over the radio and it had to be done
20 by him as a runner.

21 Q. Can we look at page 345 in the advocates' bundle,
22 please. Mr Maxwell-Scott has asked you to look at this
23 before. This is a conversation between Paul Real in
24 control and command unit 4 at 16.49.52, so a couple of
25 minutes prior to your arrival. Mr Real, in the third

1 entry against his name, says:

2 "Any news on getting someone up to 68 and 79?"

3 Command unit 4:

4 "Yeah, I've spoken to the incident commander. He's

5 aware of it and he's ..."

6 And then Mr Real says:

7 "Right."

8 Then command unit 4 says:

9 "He's definitely on the case. They've definitely

10 got crews up there."

11 "All right, 'cos the lady in 79, her ceiling's

12 coming down now."

13 "Okay, I'll update them of that as well."

14 Then we've seen the rest about calls from 82 and 80,

15 and people in both of them:

16 "There might be a baby in one of them. We're not

17 sure."

18 And Mr Real was saying:

19 "They're in such a panic now."

20 Now, the incident commander that CU4 would have

21 spoken to at that stage, at 16.49.49, would have been

22 Mr Howling, because you weren't the incident commander

23 at that time.

24 A. That's correct, sir, yes.

25 Q. Is that right?

1 A. That's correct, sir, yes.

2 Q. Do you tell the jury that Mr Howling never passed that
3 information on to you?

4 A. I wasn't given any numbers.

5 Q. Were you told that a lady in a flat was in a situation
6 where her ceiling was coming down?

7 A. No, sir.

8 Q. Were you told that there might be a baby in one of the
9 flats?

10 A. No, sir.

11 Q. Were you told that the occupants were in a panic?

12 A. No, sir.

13 Q. In your statement at page 304, you say in the second
14 paragraph that further down the street you could see the
15 ALP blocking the road:

16 " ... which I was curious about as I would have
17 expected it to have got to work."

18 Of course, you organised for it to get to work,
19 didn't you?

20 A. I did, sir, yes.

21 Q. Did you get an explanation as to why it had not got to
22 work earlier from anybody?

23 A. When I asked Watch Manager Howling, I believe he
24 mentioned somebody about he tried to deploy it, however
25 there wasn't enough space for it. It was being

1 prevented from deploying by Peckham's machine initially
2 and there was also a number of cars parked in that road,
3 and at that stage when I arrived there was still parts
4 of the building fall down alight, so you would not have
5 been able to put the cage up because it would have set
6 fire to the vehicle.

7 Q. He told the jury that the operator, Mr Sharpe, had
8 advised him that it wouldn't have been much use, but
9 that wasn't your view?

10 A. The -- at the time the -- the debris was falling down
11 the front of the building, it would not have been
12 much -- they could not have put it up. Also, they could
13 not have -- they could not get close enough to where the
14 flats were alight, because of where the occupants had
15 parked their cars, to deploy the vehicle.

16 Q. Well, let's separate it out. The parking of the cars
17 that obstructed it were on the east side, weren't they,
18 where it eventually went?

19 A. And on the west side.

20 Q. And on the west side?

21 A. Yes, sir. Immediately in front of Lakanal House was
22 an access road.

23 Q. Yes.

24 A. In the access road, when I arrived to the right, past
25 the main entrance, was Peckham's pump ladder, which had

1 plugged into the dry riser and the hydrant. There was
2 a number of parked cars between Peckham's pump ladder
3 and Peckham's pump. The aerial ladder platform would
4 not have been able to deploy there because it could not
5 have got its jacks out, and the only place it could go
6 was where Peckham's pump was, but from that position it
7 would not have been able to reach the floors that were
8 alight. It could hit it with its monitor but it would
9 not have been able to extinguish the fire.

10 Q. Can I just take a moment, madam.

11 THE CORONER: Yes. (Pause.

12 MR HENDY: Madam, there's a photograph I'd like to show the
13 officer. I'm just wondering whether it might be more
14 convenient, at 12.50, to break until 1.50. We could
15 sort out the logistics rather than take unnecessary time
16 now.

17 THE CORONER: All right. Well, that sounds sensible. Is
18 that all right with you, members of the jury? We'll
19 return at 1.50. Please go with Mr Graham.

20 Mr Cartwright, if you could remember no talking to
21 anyone during the break.

22 A. Yes, madam.

23 THE CORONER: If you could be back at 1.50.

24 A. Certainly, madam.

25 THE CORONER: Thank you.

1 (12.50 pm)

2 (The short adjournment)

3 (1.50 pm)

4 THE CORONER: Yes, thank you. Have we sorted out the
5 photographs? Yes, could we have the jury then, please.
6 Thank you.

7 (In the presence of the Jury)

8 THE CORONER: Yes, thank you. Yes, Mr Hendy.

9 MR HENDY: Mr Cartwright, we were just talking about the
10 aerial ladder pump, about which you say in your
11 statement you were curious because you would have
12 expected it to have got to work. You explained that on
13 the east side there were cars that obstructed it, and
14 you also said on the west side there were cars that
15 would have made it difficult as well. I wanted to just
16 show you some photographs if I may. These photographs
17 are going to be added to the jury's bundle tomorrow,
18 I understand, but for the moment we can see them on the
19 screen.

20 Could we start with photograph 5, thank you. This
21 photograph was taken by a resident, Mr Udi, at 16.34 or
22 thereabouts. We're looking down Dalwood Street. We can
23 see Lakanal House on our right. We're looking
24 effectively at the north end of it from the west side.
25 Does that make sense to you?

1 A. It does, sir, yes.

2 Q. I think your position, in fact, was just off the
3 cameraman's view, off to the right there somewhere?

4 A. That's correct, sir.

5 Q. We can see that what's obstructing the access road down
6 the western side of Lakanal House are two fire
7 appliances, one in Dalwood Street and one in the access
8 road.

9 A. That's correct, yes.

10 Q. Then if we could go, please, to photograph number 8.
11 There we can see the ALP situated on the east side of
12 Lakanal House, which came into play later on. If you
13 look on the west side, we can see that the two
14 appliances that were originally blocking the access road
15 have now gone and the Greenwich ALP is just moving into
16 position. Do you see that?

17 A. Yes sir.

18 Q. If we go to photograph number 9 -- Mr Atkins has
19 slightly different numbers to the ones in the bundle.
20 No, it's the same. So if we look in number 9, we're now
21 looking at the west side from a helicopter, and we can
22 see the Greenwich ALP in position, just lifting its
23 gear, yes?

24 A. Yes, sir.

25 Q. This is all much, much long after you had ceased to be

1 incident commander, of course.

2 A. I was the sector commander at that stage.

3 Q. Yes. If we go to photograph 11, we can see the
4 Greenwich ALP putting a spray onto the 5th floor fire,
5 yes?

6 A. Yes, sir.

7 Q. If we go to photograph -- let's go to 14. We can see
8 the aerial ladder platform has been extended. It's now
9 level with about the 10th floor and it's spraying water.
10 It's very difficult to see because this is a screenshot
11 from a DVD, but it's spraying water, I think, onto the
12 9th, or it may be the 10th floor. We can see that in
13 greater close-up if you look at the last photo in this
14 clip, which is number 15. Yes?

15 A. Yes, sir.

16 Q. Apart from the inconvenience of moving the two
17 appliances which were in Dalwood Street and in the side
18 road, Sedgmoor Place, down the west side of
19 Lakanal House, there wouldn't have been a problem about
20 getting the Old Kent Road aerial ladder pump into
21 position at an earlier stage as far as you can see?

22 A. No, that's incorrect. There was two -- would it be
23 possible to go back to photograph, I think, 6 or 7?

24 Q. Yes, the first one.

25 A. Sorry, you might need to slow down slightly.

1 Q. That one?

2 A. Just after that, there's a photograph looking down --

3 Q. Try the next one.

4 A. Sorry, go back to the photograph before, please.

5 Q. Right.

6 A. Okay. There was two reasons why the aerial ladder
7 platform couldn't be used initially. The first one was
8 the front of Lakanal House was disintegrating and would
9 have landed on the ALP, setting it on fire, and the
10 second reason is although Peckham's pump was initially
11 blocking its access in, when I positioned the ALP, it
12 went exactly where Peckham's pump was, because if you
13 look to -- you'll see a space at the corner of the
14 building and you'll see a silver car, a red car, there's
15 another car in front of it.

16 Q. Yes.

17 A. Where they were would have prevented the ALP from
18 deploying its jacks. The road wasn't wide enough for
19 it.

20 Q. I understand. There's no difference between us,
21 Mr Cartwright. The Greenwich ALP went where the pump
22 had been.

23 A. That's correct. But the reason it was used and not used
24 at the start is 'cos we had fire crews inside flat 9
25 putting the fire out. We would not have been able to

1 use the monitor on the ALP at that stage whilst they
2 were in the flat. It also could not have put the fire
3 out from outside the building. It could only have
4 suppressed it.

5 Q. Well, isn't mere suppression a useful task?

6 A. It is, but it would have to have fired its jet into the
7 9th floor where the BA crews are, and that would be
8 approximately two tonnes of water per minute and it
9 would have knocked them out of the building.

10 Q. What about when the fire had jumped to the 10th and 11th
11 floor, where there were no firefighters?

12 A. Again, when the vehicle is used, it can only spray at
13 an angle from outside the building. It wouldn't have
14 put the fire out, and at that stage it would more likely
15 have pushed the fire further round the building.

16 Q. Is that really the case, or is that you rationalising
17 after the event?

18 A. I've used aerial ladder platforms at high rise fires
19 before. They can make the fire worse. You have to be
20 very careful what you're doing, and we don't normally
21 use them with buildings where people are inside.

22 Q. That may very well be the case and I don't dispute it,
23 Mr Cartwright, but that's not the reason you gave for
24 not putting the Greenwich aerial ladder pump into place
25 at an earlier stage, is it?

1 A. Okay, the reason the vehicle was not used at the earlier
2 stage -- it was supposed to be used. However, as ops
3 commander, I was then informed that people were about to
4 jump from the east side of the building. The only
5 vehicle that we had on scene that had any opportunity
6 whatsoever to carry out a rescue or even suppress a fire
7 on the east side was the Old Kent Road ALP. I retasked
8 that to go to the east side.

9 Q. That I understand. The Old Kent Road appliance was put
10 to a particular use and you were not going to withdraw
11 it from that use to bring it round the west side.

12 A. That's correct, sir, yes.

13 Q. But the point remains that there is no reason why the
14 Old Kent Road pump couldn't have been put into use
15 before the people appeared on the 11th floor balcony
16 round the west side in the very position that the
17 Greenwich ALP ended up at an earlier stage.

18 A. Yes, sir, there was, because the front of the building
19 was still falling off on fire.

20 Q. But, Mr Cartwright, we know that the pump appliance was
21 sitting in exactly the same place, and that didn't --
22 the burning building didn't deter it, did it?

23 A. The cage to be able to put the fire out would have
24 been -- had to project itself quite close to the flats
25 that were on a fire. It would have, in the earlier

1 stages, been underneath where the burning debris was
2 falling from the flats, which would have put it in
3 danger of itself catching fire. It didn't affect
4 Peckham's pump, because Peckham's pump would not have
5 been underneath the falling debris that was alight from
6 the building. The aerial ladder platform, if you look
7 at your photographs, where the cage was operating, would
8 have been.

9 Q. If we look at your hand-written -- or hand-typed --
10 statement at page 121 in the advocates' bundle. Can we
11 just look at the third paragraph. There you're talking
12 about Crew Manager Clarke acting as safety officer and
13 so on and a jet being used against the 5th and 7th
14 floor.

15 THE CORONER: Can you identify the paragraph?

16 MR HENDY: It's the third paragraph down, madam, beginning:

17 "I had a CM (J Clarke) ..."

18 THE CORONER: Thank you.

19 MR HENDY: If you go to halfway through that paragraph,
20 there's a line that begins with the word "building",
21 close bracket, full stop. Let's read together from
22 there:

23 "As the jet was having a limited effect on the fires
24 above the 5th, I directed the crew to change it to
25 a ground monitor which we would use until the second ALP

1 arrived. I was aware of the dangers associated with
2 using monitors when personnel are still in the building
3 (collapsing floors/pushing fire back into the building).
4 However, crews did not appear to be attacking any of the
5 fires from inside the building and the fires were
6 intensifying."

7 If that was the case, then there was no reason not
8 to use an ALP.

9 A. There was a case, because the ALP had now been deployed
10 to the east side of the building. We only had one at
11 that stage, and we improvised with a ground monitor
12 because we had no other equipment to even attempt to put
13 the fires -- or suppress the fires from the west side.

14 Q. Then just look at the bottom paragraph on that page.
15 You're now talking about when the Greenwich ALP arrived:

16 "I can't say what the time was. I had this set up
17 at the corner of Lakanal/Dalwood Street and supplied it
18 from E372 which I also had parked in Dalwood Street.
19 The ALP got to work and started to extinguish the
20 fires -- the 5th was now out -- on the 7th, 8th and 9th
21 floor through short bursts of water from its monitor, as
22 we had done from ground level."

23 The short bursts of water were in order not to
24 injure anybody who happened to be inside; correct?

25 A. That's correct, sir, yes.

1 Q. "It then became apparent that the ALP kept stopping and
2 starting, apparently due to its safety cut-out
3 operating. The crew managed to reset it somehow and
4 I allowed it to continue working as I had no other means
5 to fight the fires on the floors mentioned."

6 Is that right?

7 A. That's correct, sir, yes.

8 Q. Let me turn to another matter. Persons reported.
9 Mr Maxwell-Scott asked you about that and showed you
10 some entries as to when persons reported was made
11 official. Your recollection was that it was much
12 earlier, that it was whilst you were en route. Just
13 tell the jury: am I right in thinking that the
14 significance of reporting an incident as persons
15 reported means that rescue of those persons reported
16 becomes an absolute priority?

17 A. No, persons reported is a message back to control which
18 informs them we need to have additional resources sent
19 to the site, and that would have been the case. We
20 would inform the ambulance service if we hadn't got them
21 already, a command unit would be mobilised if there
22 wasn't one there already and a station manager would be
23 mobilised and a fire investigation unit. The message
24 "persons reported" is just that. It doesn't actually
25 signify a priority is taking place on the fire ground.

1 Q. Does it mean that fire rescue vehicles are sent?

2 A. Not on persons reported, no.

3 Q. It doesn't imply that extended breathing apparatus
4 equipment should become available?

5 A. No, sir, you'd have to ask for that separately.

6 Q. You took the decision to move the bridgehead down to the
7 3rd floor. Just one point I didn't quite understand.
8 Probably my fault. At page 304 in your witness
9 statement, in the last paragraph on that page, you write
10 that you met Watch Manager Howling and told him you were
11 now in charge, and then you record what he told you:
12 amongst other things, that Mr Payton was in charge of
13 the bridgehead and that at least one crew were in BA
14 fighting the fire. You say:
15 "I stopped the briefing and told him it was
16 a priority to get the bridgehead moved down to the 3rd
17 floor."
18 Just pausing there, did you tell him that that was
19 his job?

20 A. Watch Manager Howling?

21 Q. Yes.

22 A. Yes.

23 Q. Then if we look at page 305 in the last paragraph, which
24 begins:
25 "Watch Manager Howling never left me to carry out

1 his tasks. He was just on the radio telling others to
2 do so."

3 In the middle of that paragraph, you say:

4 "SM Foster arrived and told me that he was there as
5 press officer."

6 You told him he wouldn't be doing that but you made
7 him sector commander and that he was to move the
8 bridgehead as there was now a fire below the bridgehead.
9 So what I didn't understand was whether you'd given the
10 task to Howling or you'd given the task to Foster, or
11 first one and then you changed it to the other.

12 A. I initially told Watch Manager Howling, because he was
13 in radio contact with the bridgehead, as a priority to
14 move it down. How that was done, whether he done it by
15 radio or he sent a runner up, it didn't matter. I just
16 wanted it done. And the reason I gave it to
17 Station Manager Foster as well is because I said earlier
18 fire crews, when they're carrying out rescues and
19 firefighting, particular when people are involved, will
20 put themselves at great risk and are very reluctant to
21 move, and I wanted it done. Station Manager Foster's
22 job was to ensure it was being done.

23 Q. So Foster was to actually go to the bridgehead and take
24 over and make sure that that was happening?

25 A. He would be taking over as sector commander fire and the

1 bridgehead would be part of his responsibility, and if
2 it hadn't been moved to the 3rd floor, then I would have
3 expected him to have gone and got it.

4 Q. Station Manager Foster then went off to the bridgehead
5 to carry out that instruction; am I right?

6 A. That's correct, sir, yes.

7 Q. He didn't have any more briefing than that at that stage
8 because of the urgency of the task?

9 A. That's correct, sir, yes.

10 Q. So at that stage, as I understand it, he was being put
11 in charge of the bridgehead without knowing what
12 resources were committed at the bridgehead above or at
13 that level; is that right?

14 A. I can't remember the exact detail but it was very, very
15 limited, because I didn't know exactly myself what had
16 been committed.

17 Q. He wouldn't, of course, have been aware of any flat
18 numbers with people wanting to be rescued because you
19 didn't know any.

20 A. I didn't tell him any numbers, no, sir.

21 Q. So when you told the jury earlier that it was a matter
22 for the discretion of the bridgehead commander as to
23 whether firefighting should be continued above the
24 bridgehead or not, Mr Foster really didn't have a lot to
25 go on, did he, to make such a decision?

1 A. He -- his decision would have been made by the
2 conditions he found inside the building.

3 Q. You were not aware of any flat numbers and Mr Howling
4 confirmed to you that there were people involved but he
5 had no idea how many or where?

6 A. That's correct, sir.

7 Q. He didn't tell you, therefore, that a search had been
8 made of the 9th floor and every door had been knocked
9 upon and some people had been rescued?

10 A. No, sir.

11 Q. He didn't tell you that a crew had gone to the 10th
12 floor and walked along the balcony on the south side to
13 see whether anybody was there and found none?

14 A. No, sir.

15 Q. He didn't tell you that no attempt had been made to
16 search and rescue on the 11th floor?

17 A. No, sir.

18 Q. When the bridgehead was moved from the 7th floor down to
19 the 3rd floor, were you aware that no search and rescue
20 had been undertaken on the 11th floor?

21 A. No, sir.

22 Q. Did Mr Howling tell you of his plan, which we can take
23 from his statement? I'll just read it to you. For
24 those that need to look, it's page 279 over to 280.
25 This is what he wrote in his statement, which he

1 confirmed to the jury was correct. He says:

2 "Watch Manager Payton informed me by radio that
3 an additional four BA crews would be required at the
4 bridgehead. In response to this, my plan was to
5 allocate BA crews from E331, E381, H242 and H222 to him
6 to fight the fires above the bridgehead and to instigate
7 a search sector with already identified flats to be
8 located as a matter of priority."

9 Did he tell you that?

10 A. He told me the intention was to send more BA crews
11 inside the building. However, once it was established
12 that the bridgehead was on the 7th floor, moving it
13 became a priority, which then stopped more crews being
14 committed from outside the building into it, because
15 I didn't want people going up inside, blocking the
16 escape route of the bridgehead as it came down.

17 Q. Did he tell you that he had been intending to instigate
18 a search sector to look for the flats which had been
19 identified to him?

20 A. No, sir.

21 Q. Did you ask him whether any searches were planned?

22 A. I didn't ask him whether any searches were planned, but
23 that was fairly obvious to us that's what needed to be
24 done once we'd started knocking the fire down.

25 Q. Did you know that Watch Manager Payton, in charge of the

1 bridgehead until Mr Foster took over, had a list of the
2 flats which had been identified in his pocket?

3 A. No, sir.

4 Q. Did he ever tell you that at any stage?

5 A. No, sir.

6 Q. Did you ask Mr Payton or Mr Howling whether there were
7 any particular flats that required help?

8 A. Once we handed over to the ops commander or incident
9 commander, the next time I spoke to
10 Watch Manager Payton -- or the only time -- was about
11 8 o'clock at night, and also, once I became ops
12 commander, I didn't have much dealings with
13 Watch Manager Howling because he was retasked.

14 Q. Anyway, as far as you were concerned, no crews were
15 going to go up as the bridgehead was being moved down?

16 A. That's correct.

17 Q. Once the bridgehead was moved down, am I right in
18 thinking that as far as you're aware no crews were sent
19 above the bridgehead for search and rescue?

20 A. Sorry, could you repeat the question?

21 Q. Yes, once the bridgehead moved to the 3rd floor --
22 before it had gone to the ground floor, but when it had
23 moved to the 3rd floor -- as far as you're aware, no
24 crews were sent for search and rescue above that 3rd
25 floor bridgehead?

1 A. I wasn't aware, but I would have anticipated as soon as
2 they moved they could have done.

3 Q. Can we look at your witness statement at page 307,
4 please. In the middle paragraph, beginning with the
5 question:

6 "What would have been your thoughts ..."

7 Mr Maxwell-Scott asked you about this. You say:

8 "Even if I had had a list of flats, if the flats had
9 been on the 11th floor we wouldn't have been able to get
10 there as there were crews only fighting the fire on the
11 9th floor and we had to get the bridgehead moved below
12 the fire floors. At that stage, I didn't know if it was
13 just one flat alight on each floor or the whole corridor
14 alight on each floor."

15 Just pausing there, crews had been up fighting the
16 fire on the 9th floor. Did you not have any information
17 from them as to the conditions that they'd found?

18 A. No, sir.

19 Q. Sorry?

20 A. I did not have any information from the BA crews.

21 Q. What about from the bridgehead, from Mr Payton?

22 A. I didn't receive any information from the bridgehead.

23 Q. That's a pretty poor state of affairs, wouldn't you
24 agree?

25 A. It was a very, very busy time.

1 Q. Well, I'm sure it was, but you're the incident commander
2 and nobody's telling you what the condition of the fire
3 is on the floor on which people are fighting it.

4 A. That's correct, sir. That's why I put in my statement
5 it was a very disjointed briefing. Radio traffic was
6 very confusing. I would not have committed crews up to
7 the 11th floor without some form of extinguisher media,
8 and the reason I wouldn't have done that is from our --
9 my knowledge, where it has been tried in a different
10 brigade, it resulted in the death of the two
11 firefighters. We don't commit people into buildings
12 where there's a possibility of them getting caught in
13 a fire without a means of extinguishing it.

14 Q. Well, I shan't put to you the obvious point that the
15 failure to do so in this case cost six lives.

16 A. I understand that, sir, yes.

17 Q. Just reading on in that paragraph, you say:

18 "It was also not known that the flats were over two
19 floors. Also I could have had a list of flat numbers,
20 sent crews to a particular flat, only to find that they
21 had self-evacuated."

22 I understand, of course, that that would mean that
23 air had been wasted breaking into flats that didn't need
24 to be evacuated, but if that's the overall governing
25 principle, it means that those who do need rescue are

1 not going to get rescued, doesn't it?

2 A. At the time, we had limited resources to use inside that
3 building. We didn't know where the flats were -- or
4 I didn't have a list of numbers at the time. If you'd
5 have given me a list of numbers without knowing
6 precisely where these flats were inside the building, as
7 far as we were concerned, they could have been nowhere
8 near where the fire floor was or a fire flat, and we
9 could have been dispatching people unnecessarily. If we
10 knew the location of them -- because I didn't know it
11 was a maisonette. If we knew the precise locations of
12 where these people were and knew that control was still
13 talking to them, we could have dispatched crews there
14 much quicker -- much more quickly than we did.

15 Q. Well, of course, the other side of that equation is to
16 send somebody to find out where the flats are, which
17 could have been done from the sign on the ground floor
18 that Mr Maxwell-Scott showed you at the beginning of
19 your evidence.

20 A. Possibly, yes.

21 Q. I get the impression that you never asked whether there
22 were any particular flats where people were complaining
23 of being trapped?

24 A. I wasn't incident commander long enough to establish
25 exactly what was going on inside that building.

1 Q. In answer to a question from Mr Maxwell-Scott this
2 morning, I recorded you as saying that in the vast
3 majority of high rise fires, people say that they're
4 trapped when they're not. Is that the thrust of what
5 you said to him?

6 A. That's correct, sir, yes.

7 Q. So does it follow from that that you don't take it
8 seriously when somebody phones up brigade control and
9 says that they're trapped?

10 A. No, that would be incorrect, sir. We take -- I take all
11 those seriously, but as I said before, without knowing
12 the precise location of where those people were, it
13 would be difficult to dispatch crews to them.

14 Q. Well, you told the jury you didn't know there was
15 anybody complaining; is that right?

16 A. I didn't use those words.

17 Q. What picture should they draw from your evidence?

18 A. What I said was that I was aware that people had
19 contacted control and said they were stuck in their
20 flats 'cos of smoke. I didn't know the conditions
21 inside the flats. I certainly wasn't aware of the
22 telephone conversations taking place between the control
23 unit and control. If I had have been at that stage,
24 then the plans that we implemented would have been
25 different. But I wasn't made aware of them at the time.

1 Q. Do you agree with me that you should have been informed?

2 A. I should have been informed, yes.

3 Q. The conversations that had taken place with the command
4 unit and control that Mr Maxwell-Scott showed you
5 earlier, presumably they should have been brought to
6 your attention as well?

7 A. All information regarding people trapped in flats should
8 have been brought to my attention, yes.

9 Q. What difference would it have made if you had been
10 informed by control that a person was still on the line?

11 A. Well, once we established exactly where they were, which
12 we could have got the information, asked control to tell
13 us exactly where they were in the building, we could
14 have dispatched crews up there with firefighting media
15 to go and rescue them.

16 Q. Would you have done that?

17 A. Yes, once the bridgehead had moved, I would have done,
18 yes.

19 Q. Once the bridgehead had gone to the 3rd floor, you would
20 have dispatched a crew wearing BA to the 11th floor?

21 A. I would have passed the information to the sector
22 commander fire and the expectation was that we would
23 have done that if it was possible.

24 Q. The jury may be thinking that it's absolutely
25 extraordinary that we've got officers on the fire ground

1 who know the flat numbers and we've got control speaking
2 to people in the block knowing the flat numbers and the
3 floors and so on, and you're the guy in the middle, the
4 incident commander, who doesn't know any of this
5 information. What is the explanation?

6 A. I suspect the information was lost due to the amount of
7 information overload that was happening at the time.

8 Q. If we look at page 310 in your witness statement, in the
9 last answer on that page, if we go down to the -- let's
10 go to the third sentence on the second line. I'm sorry,
11 let's start a little bit earlier. The question is:

12 "Near the end of your own typed notes after the
13 incident when the body had been found on the 12th floor.
14 We now know that this was flat 79, Catherine Hickman,
15 who'd been in constant contact with the brigade
16 operator. Were you aware of this at any point?"

17 Your answer is:

18 "No, I was not aware of this. When you go along the
19 balconies, there are no numbers associated with the
20 balcony doors. Also, at the time, I did not have
21 knowledge of numbers of flats where there were fire
22 survival calls."

23 Just pausing there, a fire survival call is a call
24 from a person who believes that they're at risk of fire
25 and smoke, they're speaking to brigade control and they

1 receive advice from brigade control; am I right?

2 A. I know it to be true now. I didn't know it at the time.

3 Q. "The first time I was aware of the fire survival calls
4 was when it was mentioned on the command unit by Deputy
5 Assistant Commissioner Chidgey, but I wasn't aware of
6 any numbers being mentioned."

7 That is right, is it? You weren't aware of any fire
8 survival calls prior to that?

9 A. That's correct. There is -- on the transcript from the
10 operator, they do mention something about fire
11 survivals. I didn't pick it up. What I heard them say
12 was they'd been talking to people trapped in upper
13 floors. I'd never heard the term "fire survival" before
14 then.

15 Q. Just a last couple of points if you would,
16 Mr Cartwright. Page 122, please. If we could just put
17 that up. In the middle of the paragraph there's a list
18 of floor numbers: 5th, 6th, 7th, and so on. As
19 I understand it, this is taken from your notepad, yes?

20 A. That's correct, yes.

21 Q. It says for the 11th floor:

22 "Clear. No report of any casualties found on this
23 floor."

24 We can see that on your notepad -- I can't read the
25 page number but it's the third page. I don't know if

1 Mr Atkins or Mr Maxwell-Scott can help me out. It's
2 page 3 of the handwritten notes which start immediately
3 afterwards. Is it 127? 127. Just looking at the top
4 of that, page 3 of your notebook, 10, and then 11:

5 "Clear: no."

6 And then the word is "casualties", isn't it?

7 A. That's correct, yes.

8 Q. Where did that information come from?

9 A. On the 3rd floor when they moved the bridgehead -- when
10 they'd put it back inside the building was a very large
11 hand-drawn picture of the flats on the wall that had all
12 the flat numbers, all the floor numbers, and it recorded
13 where people had been rescued from and where casualties
14 had been found, and also flats that had been damaged by
15 fire. I made a note in my notepad prior to going up
16 further inside the building.

17 THE CORONER: So the note you made in your notepad was
18 simply copying from that wall?

19 A. That's correct, madam, yes.

20 MR HENDY: We see that at page 126 that was a note made at
21 about 8 o'clock that evening.

22 A. That's correct, sir.

23 Q. The final matter arises from your page 123, please. If
24 we look at the second paragraph, it reads:

25 "I went to the 8th floor [this is earlier,

1 obviously] but couldn't get in as the fire doors were
2 closed and my express lift key would not operate the
3 firefighter's override switch to unlock the fire doors.
4 I checked the 9th and continued up to the 10th floor and
5 again found that the fire doors were locked and
6 I couldn't enter the corridor. I then made my way to
7 the 11th and found that the corridor to one side of the
8 flats was completely gutted."

9 Then if we jump down to the next paragraph, you
10 write:

11 "I found the main fire doors to the corridors of the
12 12th and 13th floors also locked and the firefighters
13 switch above each door again didn't appear to operate;
14 when I put in my express lift key to open the door, it
15 either swivelled around without operating the lock or
16 the key was prevented from going into the lock due to
17 some obstruction (paper or similar) which appeared to
18 have been inserted in the firefighters switch."

19 As I make it, that's four floors that you couldn't
20 access with your fireman's key. Is that exceptional or
21 normal?

22 A. I wouldn't say it's normal.

23 Q. It's certainly something that shouldn't happen, isn't
24 it?

25 A. That's correct, yes. I've come across that before, not

1 being able to use my key.

2 Q. On four floors?

3 A. That would be unusual, yes.

4 Q. Thank you very much.

5 THE CORONER: Thank you. Mr Dowden.

6 Questions by MR DOWDEN

7 MR DOWDEN: Good afternoon, my name's Dowden. I ask

8 questions on behalf of Mr Francisquini. You've told us

9 about the sequence of events of your leaving your office

10 and making your way to Lakanal House and receiving -- or

11 being aware of, at least -- a lot of radio messages.

12 A. That's correct, sir, yes.

13 Q. When you arrived, you told us that you then went to the

14 command unit and those messages weren't available there

15 and then. Did you ask anybody there for those messages

16 to be brought to you?

17 A. Well, I asked if they had messages and they told me they

18 didn't have them.

19 Q. Did you not think it might have been of assistance for

20 those messages to be brought to you after you'd left the

21 command unit?

22 A. Well, when they said they didn't have them, I assumed

23 that they didn't physically have the messages.

24 Q. But were you expecting those messages to be relayed to

25 the command unit at a later stage?

1 A. I would have expected that any further messages that
2 went to the command unit for the incident ground would
3 have been relaid to either myself as incident commander
4 or whoever took over from me.

5 Q. When you met up with Mr Howling, did you ask him whether
6 he was aware of any of the messages which had been
7 coming through?

8 A. No, I didn't, sir.

9 Q. Why not?

10 A. Because I was -- in the brief that he gave me, I would
11 have expected him to have told me what was going on and
12 I wouldn't have asked him for messages that I didn't
13 know about because they didn't have them.

14 Q. Did you ask him any questions during the briefing?

15 A. I confirmed the information he was giving me, and when
16 he told me that he had persons involved, I would have
17 asked him whereabouts, and that's where it would have
18 come from that he didn't know how many or where they
19 were.

20 Q. Were you curious yourself at that stage that there
21 appeared to be an awful lot of radio traffic as you were
22 making your way to the building but you'd received very
23 little information other than what Mr Howling did tell
24 you?

25 A. No, sir, it's fairly typical. Once an incident starts

1 to escalate and they ask for more appliances, because of
2 the amount of vehicles that have to be mobilised, it is
3 very common for the main scheme radio to be very busy.

4 Q. Thank you.

5 THE CORONER: Ms Al Tai?

6 MS AL TAI: No thank you.

7 THE CORONER: Mr Matthews.

8 Questions by MR MATTHEWS

9 MR MATTHEWS: Can I just get your help, Mr Cartwright, for
10 all of us, because we've learned something which I think
11 we hadn't heard before about the command unit. You've
12 just been asked some questions about radio messages and
13 messages, and I think we need your help to understand
14 this a little better. So can we go to this command
15 unit -- and I know you're not an expert in the command
16 unit, but is this right: is it your understanding that
17 the mobile command unit, once it's arrived at a scene,
18 has the facility for a computer link to the control
19 computer and the screen of information that the control
20 at brigade are typing onto the screen as they speak?

21 A. It will have a screen which shows all the messages that
22 have been recorded for that incident.

23 Q. Right. That's messages, and those messages are being
24 typed as they're happening? So if we imagine that the
25 lady or chap at brigade command who's manning the phones

1 and the radios, as they're talking down the radio and
2 phone, they are typing onto this screen a summary of
3 what they're saying and what they're hearing?

4 A. That's correct, sir, yes.

5 Q. And that's what you mean by the messages that the
6 command unit has the facility to access as they're being
7 typed?

8 A. Yes, they would have had a screen with all the messages
9 that have been recorded by the control operator and they
10 would have also been given all the messages that have
11 been sent by the appliance radio operator when it was
12 the incident command pump.

13 Q. So when you're telling us about the amount of radio
14 chatter and information because of all the units that
15 are being called and all the information that's going
16 back and forth from control to people on the fire
17 ground, that written record is a sort of clear way
18 through what's being said, isn't it?

19 A. It should be, yes, sir, yeah.

20 Q. Again, you may not be an expert in how the command unit
21 works, but was it your expectation that one of the first
22 jobs that people manning the command unit would do is to
23 set up this computer link?

24 A. It would be switched on. It would take some time for
25 them to actually set the command unit up fully, but

1 I would have -- I would have anticipated that of --
2 unfortunately, they were riding with only two people
3 that day. One would have remained on the radio to
4 control and would have booked in all the officers and
5 appliances as they arrived, and the other command unit
6 operator would have gone on the fire ground to meet up
7 with the incident commander, who was Watch Manager
8 Howling.

9 THE CORONER: Can I stop had you there, Mr Cartwright.

10 We'll hear from the people on the spot who were doing
11 that.

12 MR MATTHEWS: Can I ask you about something different, then,
13 but related again, just to check that we're
14 understanding. What you're telling us about the phrase
15 "persons reported" is in this situation, to your mind,
16 it didn't really have much significance, because by the
17 time you're being called out, what "persons reported"
18 would have effected is you being called out?

19 A. That's correct, sir, yes.

20 Q. But would "persons reported", then, be on the messages
21 that would go out to the people being summonsed as
22 a result of it being said?

23 A. They would -- they would be told that it was a persons
24 reported fire.

25 Q. Right. So you, on mobilisation, would be told "persons

1 reported"?

2 A. Yes.

3 Q. And all those extra crews would be told "persons
4 reported"?

5 A. Yes.

6 Q. Again, I don't know, but is part of the logic of calling
7 out those extra crews and a chap like you because you
8 need, potentially, lots of BA wearers to effect
9 a rescue?

10 A. You can have persons reported with just two fire
11 appliances. All "persons reported" means is that there
12 are people believed in danger and that you'll get some
13 additional resources, which would be a command unit,
14 a station manager, a fire investigation unit and the
15 ambulance services would also be requested. That's all
16 it would mean.

17 Q. Right.

18 A. In these circumstances, where the crews coming on would
19 have heard that this was now an eight pump fire, they
20 would realise it's in a block of flats and that people
21 would be involved. Regardless of whether "persons
22 reported" was sent or not, you could reasonably assume
23 that people will be involved. You know, it should have
24 been sent at the time. If it wasn't, however, that
25 didn't have any impact on the resources or the

1 operational plan to deal with that incident whatsoever.

2 Q. So help me with this one bit then that I'm not
3 understanding: the command unit that's called to the
4 scene, do you know what caused it to be called to the
5 scene?

6 A. Yes, they made -- they made it a four pump fire. A
7 command unit will -- and it was multiple calls. A
8 command unit will be mobilised on persons reported,
9 multiple calls or four pump fires.

10 Q. So if the predetermined attendance was four pumps, then
11 would that mean automatically it's four pumps and the
12 command unit?

13 A. No, specific buildings or risks would have a command
14 unit as part of their predetermined attendance. This
15 would not have one, this block of flats. When the --
16 because of the multiple calls -- so three or more calls
17 from members of the public is classed as multiple
18 calls -- control would automatically dispatch a command
19 unit and a station manager, or, as soon as them made
20 pumps four, a command unit would be dispatched and
21 a station manager.

22 Q. Okay, it may be my fault or it may be some of the
23 evidence we've heard before might be wrong -- I don't
24 know -- but wasn't the predetermined attendance for this
25 building four pumps?

1 A. I -- my understanding is the predetermined attendance of
2 this building was three pumps but they sent a fourth
3 pump because it had a watch manager on it.

4 Q. Right. We'll ask other people. If it was four pumps --

5 A. You would not get a command on it, no.

6 Q. Okay.

7 A. Unless when they got there, they said, "This is now
8 a four pump fire", and then you would get a command
9 unit.

10 Q. It isn't just me. It isn't easy, is it?

11 A. No.

12 Q. Okay. So back to the first thing I was asking you
13 again, just to help us understand, does it also follow
14 from the fact that there's this typing by the operators
15 of a summary of what they're hearing and what they're
16 saying that somewhere there'll be a printable log of
17 everything that they recorded set out in chronological
18 order?

19 A. It will be but it wouldn't normally be printed off in
20 the command unit.

21 Q. Right.

22 A. If you needed to, you could print it off the command
23 unit, but it would actually be on a screen that you
24 could scroll up and down and look at it.

25 Q. That was going to be my question. The command unit,

1 briefing -- when you're trying to fight a fire of this
2 magnitude?

3 A. Well, first of all, there was a slight delay in
4 mobilising a station manager, because the first one who
5 was paged wasn't available, and that was when they made
6 pumps four and approximately ten minutes later they then
7 mobilised myself. When you arrive, the way it works is
8 that you get a briefing off the previous incident
9 commander, and then they remain with you whilst you make
10 your decisions. So you've got the two people who
11 were -- so although I would have been incident
12 commander, I would have had Watch Manager Howling with
13 me, assisting me in my decision-making, because he would
14 have been there for 20 minutes or whatever it was
15 beforehand. So you would have had continuity in terms
16 of what was taking place.

17 Q. Yes.

18 A. Apart from the fact the briefing was quite disjointed
19 because of all the things that were going on, by the
20 time I was ready to start implementing plans, we had
21 Group Manager Freeman arrive. In a normal incident,
22 that handover between myself and Watch Manager Howling
23 would have taken probably a minute or so, because
24 I would have been able to remove him from the immediate
25 scene and given it to another officer to look after

1 whilst he briefed me in detail, uninterrupted. Because
2 this incident was escalating so quickly, that wasn't
3 possible, and if I had removed Watch Manager Howling
4 from the immediate area, all command and control of that
5 incident would have ceased, and I took the view that I'd
6 rather a disjointed briefing which took a bit of time
7 and kept the incident in control than to completely stop
8 it whilst I got my information.

9 Q. Thank you. Again, using your experience, if I can just
10 ask you for one or two observations, if possible, about
11 the period that Watch Manager John Howling was incident
12 commander. I appreciate that hindsight is a wonderful
13 thing, but if we just roll this back a bit, would you
14 agree that as a matter of pretty basic training
15 an incident commander has to gather information?

16 A. That's correct, sir, yes.

17 Q. Safety critical in that is the information of the plans,
18 the layout of the building?

19 A. If they're available, yes, sir.

20 Q. If they're available. But before you -- and I think
21 we've seen this in one of the documents. I don't ask
22 people to look it up, but it's tab 15, 1152, of
23 training. Before you commit firefighters to the
24 bridgehead, you have to know the layout of the building.
25 Would you agree with that?

1 A. In normal circumstances, if you had the availability.
2 However, Watch Manager Howling knew people needed to be
3 rescued.

4 Q. Of course.

5 A. And based on what limited information he had available,
6 he committed crews.

7 Q. Yes. Now, if one then comes to the scene of you
8 visiting the command unit, the picture you paint is
9 a pretty worrying one, isn't it?

10 A. At in what way, sir?

11 Q. Well, there you are, you turn up at the command unit,
12 there are no plans, there are no messages recorded.
13 Forgive me, but the jury might feel that there was
14 a scene of chaos in the command unit.

15 A. I wouldn't describe it as a scene of chaos. I would say
16 that they were overwhelmed with the information that was
17 coming in, and I think because of that, that's why they
18 hadn't had the opportunity to set up as they normally
19 would do.

20 Q. I mean, it wasn't going to plan, was it?

21 A. That's correct, sir, yes.

22 THE CORONER: Well, Mr Compton, Mr Cartwright wasn't part of
23 the command unit and I think it's only fair that
24 questions about that should be put to those who were
25 involved directly rather than to Mr Cartwright.

1 MR COMPTON: Can I make it clear I am criticising this
2 officer at all. I'm just using his available experience
3 on this. You weren't satisfied with the situation that
4 you saw, were you?

5 A. I decided -- because of the seriousness of the situation
6 and the information -- or lack of information I was
7 being given and the look of the two command unit
8 officers, I decided to take over in the command unit,
9 which you don't normally do.

10 Q. That's what I wanted to ask you about. As the senior
11 officer there, you could have let the situation continue
12 with the incident commander, could you not, knowing that
13 a more senior officer was en route?

14 A. Once it became a six pump fire, the expectation was that
15 I was going to take over. I could have delayed taking
16 over, knowing that a group manager was going to arrive.
17 However, I didn't know with they were going to arrive.
18 However, morally, when I saw the incident or what I
19 perceived was going on, I felt obliged, as the most
20 senior officer there, to take responsibility and take
21 over that incident.

22 Q. You've heard a certain amount about this list that may
23 be very important -- you understand that -- in this
24 inquest. If you, as an incident commander, had been
25 handed a list of flats where people were effectively

1 trapped and that was what the list said, compiled, as we
2 know, by Firefighter Mullins, what would you have done
3 with that list?

4 A. If I'd been given a list, I would have designated
5 an officer to communicate that to the bridgehead, and we
6 would have put plans in place to -- if we knew where the
7 flats were inside the building -- look at committing
8 crews with extinguishing media to go and check out the
9 flats and extinguish any fires. However, that would not
10 have happened until the bridgehead moved.

11 Q. Were you informed at any stage that there were serious
12 communication problems between the BAECO officer and the
13 BA firefighter officers further up?

14 A. I wasn't made aware of that, but again, in incidents
15 I've been to before, communications can be an issue.

16 Q. The evidence that we heard was from a trainee
17 firefighter by the name of Miller, who was actually in
18 charge of the breathing apparatus board at one point,
19 who said that he couldn't get through to any of the
20 breathing apparatus firefighters and had to use the
21 personal radio of Crew Manager Clarke. Now, is that
22 normal, to have such problems with radio communication
23 in a high rise building?

24 A. It's not normal to -- you'll always have some --
25 normally some type of communication, but it is not

1 unusual for, from time to time -- because it happened to
2 me while I was at the incident as well -- to lose
3 communications with people.

4 Q. I mean, today do you use the same sort of radios or has
5 the system improved?

6 A. No, we have the same radios.

7 Q. Did it come to your attention that that list actually
8 had never been produced and remained in someone's
9 pocket?

10 A. I wasn't aware of that, sir, until I read the
11 transcript.

12 Q. Does that surprise you when you hear that?

13 A. Well, I can't comment on the actual actions of the
14 individual officer, but I would have assumed that when
15 a list was produced it would have been used.

16 Q. Yes. Thank you.

17 THE CORONER: Thank you. Mr Walsh.

18 Questions by MR WALSH

19 MR WALSH: Thank you, madam.

20 Mr Cartwright, I want to take you right back to the
21 point of your arrival on that day at Lakanal. You had
22 been deployed for the purposes of attending a fire in
23 a flat on the 9th floor?

24 A. That's correct, sir.

25 Q. I'm looking now -- I might as well look straight to it,

1 please, if you wouldn't mind -- at page 305 of the
2 bundle. This is your statement dated 26 April. The
3 first time you've been taken to it, I think.

4 So having been committed to a flat fire on the 9th
5 floor, you arrived, and we can see at the top of that
6 page:

7 "During this time [this is shortly after your
8 arrival] I looked up at the building. I could see
9 a scene similar to that shown in [the photographs which
10 we have seen]. The fire on the lower floors of the
11 building, 5 and 7, would be flame and thick smoke and
12 then, due to air currents, it would look as though the
13 fire on those floors had died down and then it would
14 start up again."

15 Then you describe what was happening to the jet
16 hitting the lower floors.

17 Now, we have seen many photographs, and by
18 definition they're snapshots of frozen moments in time.
19 I want you to help us with what it was like trying to
20 see what was going on in the flats above from ground
21 floor level, bearing in mind the weather conditions, the
22 wind, and the movement of smoke. Can you help us to the
23 extent to which it varied in time?

24 A. In the time that I was sector commander, you'd have
25 moments where it would appear that the fire certainly on

1 the 9th floor had been completely extinguished, and then
2 the wind would pick up and then you'd have quite a lot
3 of flame suddenly appear from out the front of the
4 building -- in fact, this was all the flats involved.
5 You'd have thick smoke in the immediate vicinity of the
6 flats and it would then be blowing across the whole of
7 the flats, and then the wind would die down again and it
8 would appear as if the fire was out. And that's why we
9 were moving our jet backwards and forwards from
10 different places trying to put it out.

11 Q. Yes, we've heard residents describing smoke appearing in
12 varies patterns across the windows.

13 You mentioned earlier on -- I think this morning --
14 that the term "trapped in a flat", a person who is
15 trapped in a flat, could mean a variety of things --

16 THE CORONER: Do you mean "persons reported"?

17 MR WALSH: No, trapped.

18 THE CORONER: Okay.

19 MR WALSH: So "persons trapped" might mean a variety of
20 things. It might mean, for example, you've told us,
21 that a person was in a flat, had opened a door to
22 a corridor which was smoke-filled and felt that they
23 shouldn't go out into the corridor; is that right?

24 A. That's correct, yes.

25 Q. In those circumstances, what would you normally expect

1 to be the safer thing to do if there is a heavily
2 smoke-logged corridor and a flat?

3 A. I would expect the person to go back into their flat if
4 it wasn't involved in fire and, with our advice or
5 control's advice, would be to put stuff down around of
6 the edges of the door to stop smoke coming in and then
7 go to a window where they could breathe fresh air,
8 because that would be safer than bringing them out into
9 the corridor if there's smoke.

10 Q. There came a point, of course, when it was decided to
11 bring the bridgehead down. I'm not going to go into
12 detail about that because you've been asked many
13 questions about it but the consequences of it have been
14 put to you. I want to ask you this: what might have
15 been the consequences if you had not moved the
16 bridgehead down and had continued to commit firefighters
17 into the building past the fire floors and above?

18 A. The initial consequences would have been the staircase
19 would have become completely smoke-logged. The
20 firefighters who were at the bridgehead without
21 breathing apparatus would have been overcome. If they
22 hadn't been rescued, they would suffocate, because,
23 again, they had no breathing apparatus and firefighters
24 are affected by smoke as much as anybody else.

25 Q. You were looking at a building with 98 flats and many

1 residents. What was your aim, actually? Were you
2 looking at the safety of firefighters or the safety and
3 protection of the public in doing that?

4 A. If we lost the bridgehead, all firefighting and rescue
5 would have ceased. Moving the bridgehead down to the
6 3rd floor -- although there would be some delay whilst
7 they descended four floors, as soon as they got there,
8 we could then immediately deploy crews back up to where
9 the people were trapped and rooms were on fire.

10 Q. All right. Thank you. Just finally, I just want to ask
11 you very briefly about the use of aerial ladder
12 platforms. We'll hear some more evidence, I think, from
13 someone who's trained for the purpose of doing it, but
14 I wanted to ask you: from a command point of view,
15 an aerial ladder platform is a specialist piece of
16 equipment?

17 A. That's correct, sir, yes.

18 Q. It is crewed by specially trained firefighters?

19 A. That's also correct, sir, yes.

20 Q. Of course, you're the commander, or whoever's in command
21 is in overall control, but how important is it to take
22 advice of the specialist operator of the ALP in deciding
23 whether or not -- and if so, by what means -- to deploy
24 an aerial ladder platform?

25 A. They are the experts and I would put a lot of weight on

1 their advice.

2 Q. Yes. We've been shown a photograph -- we needn't look
3 at it again -- at 16.34 where, on the north-west corner
4 of Lakanal, just on the access road on the west side,
5 a Peckham pump is parked in that position.

6 A. Correct, sir.

7 Q. That was at 16.34. Now, at that stage, we're all
8 agreed, that was prior to the fires breaking out on the
9 lower floors.

10 A. I believe so as well.

11 Q. Right. What I want to ask you about is: if a fire in
12 a multi-story block is occurring in an single flat, let
13 us say on the 9th floor in a high rise, would you
14 anticipate the use of an ALP, or would you anticipate
15 fighting the fire internally using a dry riser?

16 A. If it remained in the one flat, I would fight it from
17 inside the fire -- sorry, from inside the building.

18 Q. So it was only after the development of the fire that
19 the consideration of the ALP would have come into your
20 mind?

21 A. That's correct, sir, yes.

22 Q. I think that's why we had the message "make pumps 12,
23 two ALPs" just after 5 o'clock?

24 A. That's correct, sir, yes.

25 Q. It was put to you that once you did know the fire was

1 developing above and below that there may have been
2 a purpose in trying to deploy the Old Kent Road aerial
3 ladder platform on that particular corner, on the
4 west/north-west corner, and you've described why that
5 would not have been done. But in any event, when you
6 were called to the east side of the building, with the
7 obvious concerns for the persons on the balcony on the
8 11th floor with the makeshift rope coming off, which
9 would have been the priority for you in relation to the
10 use of an ALP at that time?

11 A. The east side, because of the persons who needed
12 rescuing.

13 Q. Yes. Of course, later on the Greenwich aerial ladder
14 platform arrived -- much later on -- and it was
15 deployed. Can you help us with what the difference was,
16 if any, between the safety or otherwise of deploying the
17 Greenwich ALP on the western side of the building later
18 on in the fire -- the difference between deploying it
19 then and the potential for deploying an ALP in the early
20 stages of the fire on the western side?

21 A. By the time the Greenwich ALP was deployed, the front of
22 the building was no longer falling off it on fire.

23 Q. All right. Yes, all right. Thank you very much.

24 THE CORONER: Thank you. Members of the jury, do you have
25 any questions?

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Questions by the Jury

THE FOREMAN OF THE JURY: Thank you, madam coroner. We do have a few.

We were just wondering, could your definition of "trapped" not really mean that people who were seriously trapped undermine search and rescue?

A. By "trapped", all that would mean was somebody who felt unable to leave their own flat.

THE FOREMAN OF THE JURY: I think what my fellow juror may be getting at is that when you hear "trapped" and you realise that there could be somebody who is feeling trapped but by your definition is not actually, you know, unable to get out, would search and rescue perhaps put a trapped call at a lower priority in relation to other tasks than they might be if it was specifically clear that this person was in imminent danger?

A. If -- if we were aware that people were trapped and there was a serious risk of them becoming casualties, then as soon as we had resources available we would send them to those flats.

THE CORONER: I wonder whether, behind the question, is the concern that it may not be obvious to those fighting the fire on the ground whether someone is feeling trapped but actually is safe or someone is trapped and is very much at danger.

1 A. Yeah, if -- it's possible, again, from experience that
2 you could have a flat fire when you get half a dozen or
3 who are people who phone control to say they're stuck in
4 their flats and -- because of smoke, and what we would
5 do, as we were tackling the fire, as resources became
6 available, we would go and get them, and on a lot of
7 occasions, they're not in imminent danger from the flat
8 fire.

9 In this case, had we been aware that control were
10 talking to people and this was actually on the fire
11 ground itself, not just the command unit, which was
12 50 metres away -- had we been aware that control were
13 actually speaking to people and they could identify what
14 flats they were in, we would have given it a greater
15 priority to get to those flats more quickly. But as
16 I said, we couldn't do anything whilst the bridgehead
17 was moving. We had to have the bridgehead set up so
18 that crew --

19 THE CORONER: I think we've covered that ground. Thank you.

20 Yes?

21 THE FOREMAN OF THE JURY: Thank you. The next question we
22 have has two parts, but you may wish to break it down to
23 answer each. To your understanding, what is expected to
24 be the added value of having a command unit present? Is
25 the direct link to control a key purpose of the command

1 unit? We understood from earlier evidence given that
2 there was a direct link to control via a runner, perhaps
3 Firefighter Mullins, who used the Peckham pump that was
4 parked in front of the stairwell. So he was radioing
5 with control from that appliance. Did the command unit
6 that you came across replace that link, being
7 Firefighter Mullins in Peckham's pump, or did it provide
8 a second, alternative link with control?

9 THE CORONER: Perhaps we could take that in two parts.

10 Firstly, in broad terms, the value of a command unit, if
11 you could deal with that quite briefly.

12 A. Okay. The value of a command unit is on the command
13 unit they have all the facilities. They can talk to
14 control via telephone and radio. They have the facility
15 to book in all the appliances. They have television
16 screens where they can pull up aerial shots of
17 incidents. They can produce a complete list of all
18 messages that have taken place. It's where all crews
19 report to -- the police, ambulance. It's a focal point
20 for command. The incident commander would have -- be
21 able to put plans up at the incident. They would know
22 exactly what resources they had, what was in reserve,
23 and that is where they would do all their briefings
24 from, because it's a calm area away from the incident
25 ground.

1 THE CORONER: Thank you very much. Then the second half of
2 the question, if I could just summarise it: if you could
3 tell from us briefly from your own knowledge of what you
4 were doing on the day the links between the command unit
5 and where you were physically when you were away from
6 the command unit.

7 A. Once the command unit took over -- and that would inform
8 control that they are now command -- they are a command
9 set up, they would be the link between control and the
10 fire ground.

11 THE FOREMAN OF THE JURY: Sorry, I'll just check with my
12 fellow juror. Okay. Then just a couple of short ones.
13 You've mentioned that the safety cut-out of the ALP had
14 kicked in a couple of times but the crew sorted it out.
15 I was just wondering what prompts or causes that safety
16 cut-out.

17 THE CORONER: I think we might wait until we hear from
18 someone who can give direct evidence on that point.

19 THE FOREMAN OF THE JURY: Okay. In that case, the last
20 question: when you used the term "press officer", that
21 being your colleague very early on, does "press"
22 actually refer to in a media sense or some other
23 definition of "press"?

24 A. Most senior officers have their own -- they are all
25 operation officers but they also have another

1 THE CORONER: Yes, Mr Maxwell-Scott.

2 MR MAXWELL-SCOTT: Madam, the next witness is

3 Group Manager Freeman. I don't think he will finish his

4 evidence today. In fact, I'm sure he won't.

5 THE CORONER: No, but it would be desirable to begin, yes.

6 MR MAXWELL-SCOTT: If you wanted to take a five minute break

7 in the afternoon, now would be a sensible time to do so.

8 THE CORONER: Yes.

9 Members of the jury, is it all right this

10 afternoon -- if we have a short break now, would it be

11 convenient if we went on until about 4? All right,

12 let's have a short break now and if you could be back by

13 quarter past. Thank you.

14 (3.04 pm)

15 (A short break)

16 (3.13 pm)

17 THE CORONER: Yes, can we ask the jury to come back in,

18 please. Mr Freeman, if you're in court, could I ask you

19 to come forward, please, thank you.

20 (In the presence of the Jury)

21 THE CORONER: Yes.

22 MARTIN FREEMAN (sworn)

23 THE CORONER: Thank you very much. Mr Freeman, do sit down.

24 Do help yourself to a glass of water.

25 A. Thank you.

1 THE CORONER: Please could you make sure that you speak up
2 to make sure we all hear what you're saying. If you
3 stick close to the microphone, that would help, and it
4 will help you to do that if you -- it may feel a bit
5 artificial, but if you direct your answers across the
6 room to the jurors, that will help them to hear what
7 you're saying and help you to stay close to the
8 microphone.

9 A. Yes, madam.

10 THE CORONER: Mr Maxwell-Scott, who is standing, is going to
11 ask some questions initially on my behalf and then there
12 will be some questions from others.

13 A. Yes, madam.

14 THE CORONER: Thank you.

15 Questions by MR MAXWELL-SCOTT

16 MR MAXWELL-SCOTT: Good afternoon, Mr Freeman. Could I ask
17 you to give the court your full name please.

18 A. Martin Andrew Freeman.

19 Q. Is it right that on 3 July 2009 you were a temporary
20 group manager --

21 A. That's right, sir.

22 Q. -- employed by the London Fire Brigade?

23 A. That's right, sir.

24 Q. When were you first employed by the London Fire Brigade?

25 A. In April 1995.

1 Q. When did you become a temporary group manager?

2 A. 1 April 2009.

3 Q. What position do you hold now?

4 A. I'm a station manager.

5 Q. When did you become a station manager?

6 A. 1 April 2010, after I finished my period of temporary.

7 Q. Presumably you'd been a station manager before?

8 A. Indeed, yeah, approximately --

9 Q. When were you first promoted to station manager?

10 A. 2006.

11 Q. What position did you hold in July 2009?

12 A. I was a group manager in the central service delivery

13 team based at brigade headquarters.

14 Q. What was the central services delivery team?

15 A. The central service delivery team is the team that

16 manages the overall running of the London Fire Brigade.

17 Q. When did you take up that post?

18 A. 1 April 2009.

19 Q. What operational experience had you had before that?

20 A. Prior to that, I had obviously served as firefighter,

21 crew manager and watch manager at a fire station, and

22 I was then promoted to station manager and I served as

23 an operational station manager.

24 Q. At which station?

25 A. I first served as an operational station manager in

1 a fire safety team which was Kensington and Chelsea.
2 I was then the station commander at Surbiton fire
3 station in south west London.

4 Q. In the central service delivery team, on average how
5 often were you called out to operational duties?

6 A. I attended regular incidents. I had a -- as well as
7 having an operational role, I had a fire safety role,
8 which meant that I would be mobilised to incidents as
9 a senior fire safety officer. So I attended
10 a reasonable number of calls. Probably 20 a month.

11 Q. Before 3 July 2009, had you ever been to Lakanal House?

12 A. I had not.

13 Q. Because you're still serving in the London Fire Brigade,
14 it's advisable for me to remind you that if I ask you
15 about policies and practices, unless I indicate
16 otherwise, my questions will be directed to how things
17 were done on or before the date of the fire.

18 Turning then to previous occasions when you had been
19 asked to give an account of your involvement in
20 firefighting on the day of the fire, firstly I believe
21 you prepared some typed notes. If I ask you to look in
22 the advocates' bundles, file 1 at page 172, please.

23 (Handed) Looking at the first page then, and if you
24 turn over to the second and final page, is that your
25 signature at the bottom and the date, 11 July 2009?

1 A. It is, sir.

2 Q. Back on the first page, in the second line you have the
3 date, 3 July 2009, which is, of course, the date of the
4 incident. Firstly, can I ask you this: did you type
5 these notes up yourself?

6 A. I did.

7 Q. Do you remember which date you did so?

8 A. I began on Monday, 6 July, when I returned to work.

9 Q. When did you finish?

10 A. I think I finished the notes the following day or the
11 day after.

12 Q. You then gave a witness statement, which is dated
13 11 July 2009. If I could ask you to identify that in
14 the statements bundle at page 311. (Handed)

15 A. That's correct.

16 Q. That's your statement?

17 A. It is, sir.

18 Q. Your typed notes that we previously saw were signed also
19 with the date 11 July 2009. Is that because you were
20 asked to sign them at the meeting at which your witness
21 statement was taken?

22 A. I believe so, it was, yes.

23 Q. So you had your notes with you at the meeting when your
24 statement was taken?

25 A. I did.

1 Q. Then I believe you attended a PRC, performance review of
2 command, on 14 July 2009. If I could show you some
3 notes just to indicate your attendance. Page 1324 of
4 the advocates' bundles. (Handed) You will see on
5 page 1324 handwritten notes and your name against "IC4".
6 A. Yes.
7 Q. Short for "incident commander 4". It may well be that
8 these are not notes you've ever seen before.
9 A. That's correct. I haven't seen them before.
10 Q. But do you recall attending a performance review of
11 command?
12 A. I do.
13 Q. Then you gave a second witness statement dated
14 13 April 2010. That starts at page 321 of the
15 statements bundle.
16 A. That's correct, sir.
17 Q. The first paragraph of the statement says that when you
18 gave it you had with you a copy of your first statement,
19 an incident report, and plans and photographs.
20 A. Yes, that's correct.
21 Q. Mr Freeman, what I'd like to do next is just for the
22 benefit of the jury to sketch out very briefly the
23 nature of your involvement so that we can all understand
24 where you fit into the picture, and then come back and
25 look at events in more detail. Firstly, where were you

1 when you were first alerted to the incident at
2 Lakanal House?

3 A. On the day of the incident, I had just left brigade
4 headquarters and I was driving along the embankment on
5 my way home. Due to the requirement of me to work
6 a different administration work time, I was able to
7 leave early and then I would remain on duty until
8 5 o'clock for operational reasons. So I was proceeding
9 in a home direction when I received a page informing me
10 that a station manager had been mobilised to a four pump
11 fire.

12 Q. Then is it right that in due course you yourself were
13 mobilised to attend?

14 A. That's correct.

15 Q. The records that we have, which I don't ask you to turn
16 to at this stage, indicate that you arrived at
17 1657 hours.

18 A. Yes, I believe so. I think it would have been slightly
19 before that.

20 THE CORONER: Mr Freeman, I'm not hearing you very easily.
21 I wonder if you could possibly pull the microphone
22 slightly towards you.

23 A. Sorry, madam. I would have believed I arrived slightly
24 before then.

25 MR MAXWELL-SCOTT: But around that time?

1 A. Around that time, yes.

2 Q. Did you know that you would become incident commander on
3 arrival?

4 A. I did not at that time. I believed it to be a six pump
5 fire.

6 Q. How many pumps would it need to be before you would be
7 required to be incident commander?

8 A. A group manager would have to take over at an eight pump
9 fire. However, I would have discretion to do so earlier
10 if I felt it was necessary.

11 Q. Whilst it remained a six pump fire, if you chose not to
12 become incident commander, what would your role be?

13 A. My role would have been monitoring officer. In that
14 role I was there to support the incident commander.

15 Q. Just explain, for the benefit of the jury, the system of
16 monitoring officers.

17 A. Whenever officers are paged to attend an incident,
18 a monitoring officer is assigned to listen or to attend,
19 depending on the type of incident, and to provide
20 support, should that be required, on the incident ground
21 to the incident commander, should he be inexperienced on
22 that particular type of incident or where the incident
23 required that level of support.

24 Q. And the monitoring officer, is that always somebody of
25 a higher rank than the incident commander?

1 A. It is.

2 Q. As it happened, by the time you arrived it was an eight
3 pump fire, wasn't it?

4 A. I believe so.

5 Q. And so you took over from Station Manager Cartwright.
6 I'll ask you about the details of that later. The
7 message that was sent informing control that you were
8 the incident commander was sent at 17.19.10, and we can
9 see that at page 400 in the advocates' bundles. The
10 page is up on the screen.

11 If you look at the third box, 17.19.10, the fourth
12 thing that is said is CU4 stating to brigade control:
13 "Group Manager Freeman now incident commander."
14 Do you see that?

15 A. Yes. Yes, sir.

16 Q. Then if we look over the page, 401, this is now 45
17 seconds later, 17.19.55, and the final thing said in
18 that box is:
19 "Deputy Assistant Chidgey now incident commander."
20 So on the face of it, you were incident commander
21 for 45 seconds, but I think you'll tell us that that is
22 far from being accurate; is that correct?

23 A. That's correct.

24 Q. We'll come back to some of the details in a moment, but
25 from your own recollection, how long do you estimate you

1 were incident commander for?

2 A. Between 20 minutes and -- 20 minutes to half an hour,
3 possibly. I can't be certain.

4 Q. We'll be able to look at some events in due course which
5 may help you to narrow that down.

6 Before looking at those events in detail, could
7 I ask you some general questions about where you were
8 and what information you had access to when you were
9 incident commander. Firstly this: as incident
10 commander, did you remain in one place or did you move
11 around?

12 A. I took up a number of positions on the incident ground.

13 Q. So pausing there. I'll put up on screen an aerial
14 photograph that may assist. We're looking here at
15 photograph 3, and if I indicate in the middle of the
16 screen with the white arrow, that's Lakanal House.
17 North is at the top of the page, so where the access
18 road is, which is the west side of Lakanal House, that
19 is the side where the lift lobby is and the main
20 dry riser. Where I'm now showing you, on the opposite
21 side of the building, is the east side. Does that help
22 to enable you to get your bearings?

23 A. Initially when I arrived at the incident, I went to the
24 east side of the building. Following taking over as
25 the -- the commander -- the incident commander, I went

1 to the west side of the building.

2 Q. Did you remain there as incident commander, or did you
3 subsequently move?

4 A. I did -- I moved a couple of times, obviously, to size
5 up the incident and to gather information, and
6 subsequently when my role changed I did remain in that
7 position.

8 Q. I think you are the first incident commander who has
9 described moving in order to size up the incident whilst
10 incident commander. Can you just describe to us why you
11 did that and whether any part of your training
12 encourages that?

13 A. When I arrived at the incident, I found the incident
14 commander and got a briefing from him and prepared to
15 take over, and obviously to develop an operational plan.
16 In order to do that, it meant that I needed to look at
17 the building as a whole and to see where separate areas
18 of operations were.

19 Station Manager Cartwright had already initiated
20 a bridgehead and previous officers had done so also, and
21 I needed to find out where those firefighters were and
22 what they were doing, what the situation was.

23 Q. That first meeting with Station Manager Cartwright, was
24 that on the west side of the building?

25 A. It was on the green -- green area, yes.

1 Q. I'm just going to put up now photograph 44. This is
2 taken from the corner of Dalwood Street and
3 Sedgmoor Place, from the pavement rather than from the
4 green area. To what extent does that represent the view
5 you had when you joined Station Manager Cartwright?

6 A. That is -- we would have had a similar view to that. We
7 would have been to the south slightly more.

8 Q. Going back to photograph 3, that was taken from the
9 corner which I'm marking with my arrow. You would have
10 been slightly more to the south in the direction I'm
11 showing you?

12 A. Yes, sir.

13 Q. Where else did you go as incident commander to size up
14 the scene?

15 A. I went to the west side of the building, to the
16 staircase where the bridgehead was being controlled
17 from.

18 Q. Do you mean the west or the east?

19 A. The east side, sorry.

20 Q. You went to the other side of the building?

21 A. Yes, that's correct.

22 Q. Can you help us with whether you got there by walking
23 round the building or by, in effect, walking under the
24 building?

25 A. I walked around the building. It wasn't possible to

1 walk through the underside of the building due to the
2 state of the fire and the debris that had fallen from
3 above.

4 Q. Do you recall whether you walked round to the north side
5 or the south side?

6 A. To the north.

7 Q. Did you remain on the east side until you were replaced
8 as incident commander, or did you also go somewhere
9 else?

10 A. At some point during the incident, I attended the -- the
11 command unit for a briefing.

12 Q. This is CU4, was it?

13 A. That's correct.

14 Q. Can you just remind us where that was parked?

15 A. It was parked in Havil Street.

16 Q. Somewhere towards where I'm marking with the arrow?

17 A. Yes, sir.

18 Q. Is that where you were when you were replaced as
19 incident commander?

20 A. It wasn't. I was replaced -- I gave a briefing and
21 a handover to DAC Chidgey on the -- on the east side of
22 the building.

23 Q. So you started as incident commander on the west side?

24 A. That's correct.

25 Q. You walked around the north side of the building to the

1 east side. As incident commander, you also made your
2 way to CU4?

3 A. I did.

4 Q. And you made your way back to the east side of the
5 building, and it was there that DAC Chidgey replaced
6 you?

7 A. Yes sir.

8 Q. Thank you. Other than what you could see whilst you
9 were on the fire ground and moved in the way you
10 described, can I just run through quickly with you what
11 other sources of information were available to you. Am
12 I right in thinking that you couldn't directly hear
13 radio messages from brigade control unless you happened
14 to be in command unit 4 at the time they were sent?

15 A. That's correct.

16 Q. You would have had a personal radio?

17 A. I did.

18 Q. Did you have it on so that you could hear messages on
19 it?

20 A. I did.

21 Q. Could you hear what firefighters committed in breathing
22 apparatus were saying?

23 A. I couldn't. They were on channel 6; I was on channel 1.

24 Q. You would no doubt have had information being passed to
25 you verbally by other members of the London

1 Fire Brigade?

2 A. Yes, sir.

3 Q. What about by members of the emergency services?

4 A. That's correct.

5 Q. Members of the public?

6 A. I believe so.

7 Q. Did you get any messages in written form, any notes
8 being given to you, or was it all verbal?

9 A. Some time later at the bridgehead we did receive some
10 paperwork, yes.

11 Q. Was that after you stopped being incident commander?

12 A. No, I was still incident commander at that time.

13 Q. Let's deal with it while we're on the topic. What notes
14 were you given at the bridgehead, which I'm assuming at
15 this time was on the ground floor outside the building
16 on the east side?

17 A. At the bridgehead, I was liaising with the station
18 manager who was in charge of the bridgehead and the
19 firefighter who was collating flat numbers of persons
20 who were unable to believe the building. That was
21 handed to me and I then handed it to the station manager
22 who was in charge of the bridgehead.

23 Q. Was that Station Manager Foster?

24 A. Station Manager Foster, yes.

25 Q. So you were temporarily in charge of the note and you

1 handed it on to Station Manager Foster?

2 A. That's correct.

3 Q. Then, turning to how you gave your orders and
4 instructions, would I be right in thinking that you
5 didn't give them directly to brigade control?

6 A. Sorry, can you repeat the question?

7 Q. You didn't communicate directly with brigade control to
8 give your instructions?

9 A. No.

10 Q. Did you give any orders over your personal radio?

11 A. I did.

12 Q. I'm assuming you didn't give orders directly to
13 firefighters in breathing apparatus?

14 A. I did not.

15 Q. You would have given verbal orders to London
16 Fire Brigade members?

17 A. I did.

18 Q. What about to members of other emergency services?

19 A. I did. I had cause to speak to the London Ambulance
20 HART team, a London Ambulance incident officer and
21 members of the Metropolitan Police.

22 Q. Could you just explain for the members of the jury what
23 the London Ambulance Service HART team is?

24 A. The London Ambulance Service has a team -- has an area
25 response team, which is a team of paramedics who are

1 trained to carry out life support in hazardous areas and
2 they're trained by the London Fire Brigade in the use of
3 breathing apparatus.

4 Q. Did you give any direct instructions to residents?

5 A. I did not.

6 Q. Did you give instructions by notes at any stage, or was
7 it all verbal?

8 A. It was all verbal.

9 Q. Did you make any notes whilst incident commander?

10 A. No, sir.

11 Q. Just on that point, in your second witness statement,
12 you said something about making notes at the time that
13 were "flat numbers of the casualties I spoke to". I'll
14 just find it for you. It's page 320 in the statements
15 bundle. In the third paragraph there, you said:

16 "During the course of the incident, I made no
17 contemporaneous notes apart from putting down the flat
18 numbers of the casualties I spoke to. I passed this
19 information to the ambulance service."

20 So firstly, was that when you were incident
21 commander?

22 A. No, that was when I was operations commander.

23 Q. Can you just explain what that paragraph refers to?

24 A. During the course of the fire, I was positioned at the
25 bottom of the staircase and fire -- firefighters were

1 coming out of the building with casualties, and
2 I felt -- thought it would be useful to find out where
3 those casualties had come from so that we could collate
4 the positions of those flats, both so that obviously the
5 LAS knew where they had come from and also that we could
6 get that information back to the bridgehead so that they
7 could confirm that those flats had been searched and
8 cleared.

9 Q. When you say "casualties", do you mean people who were
10 helped out but could speak for themselves or people who
11 were carried out and the firefighters had to speak for
12 them, or both?

13 A. It was people that were helped out who could speak for
14 themselves.

15 Q. Whilst you were incident commander, did you have anyone
16 at your side making notes for you?

17 A. I did not.

18 Q. So essentially as incident commander everything is being
19 done verbally and in your head?

20 A. That's correct.

21 Q. Is that normal?

22 A. It is, although brigades -- fire brigades around the
23 country are now looking at changing that procedure so
24 that notes are made as an incident log to give
25 additional information for debriefing, et cetera.

1 Q. When you say "for debriefing", we could be talking not
2 just about a debrief when the incident is over, but it
3 could be a debrief to the next incident commander,
4 couldn't it?

5 A. It could.

6 Q. So there could be a need for debriefing at a time when
7 it is of practical use to deal with the incident, as
8 well as to learn lessons afterwards?

9 A. That's correct, but of course we are trained so that we
10 are able to provide a good briefing verbally to incident
11 commanders and also other officers that are at the
12 incident.

13 Q. So if I ask you about the steps you took to be in
14 a position to brief the next incident commander, if
15 there were to be one. Essentially that is about drawing
16 on the information in your memory and passing it on; is
17 that right?

18 A. That's correct.

19 Q. Before we discuss the incidents of the day in more
20 detail, let me say that I understand that it was a busy
21 incident with many crews in attendance and much
22 happening at the same time. I, of course, can only ask
23 you one question at a time, and I can only ask you about
24 one event at a time. At times, I will ask you about
25 what order you believe events happened in, but if at

1 other times you think that events happened in
2 a different order to the order in which I'm asking you
3 about them, or at the same time as each other, then you
4 should say so.

5 A. Yes, sir.

6 Q. Finally by way of introduction, before we look at the
7 events in detail, I wanted to take you to some passages
8 in your witness statements to see if they still reflect
9 some of your impressions about this event, starting in
10 your first statement at page 318. I'm looking here at
11 the second paragraph of 318, when you said:

12 "In my experience as a firefighter, I have never
13 seen a fire spread in such an uncontrolled way, from
14 floor to floor and flat to flat. My operation training,
15 as well as my fire safety training, gave me cause to
16 believe that the fire operation within the building was
17 not as it should have been."

18 That's in a statement that you made eight days after
19 the incident. Was that your thinking at the time?

20 A. It was.

21 Q. And still is?

22 A. It is. I -- my impression was that the passive fire
23 safety arrangements within the building had completely
24 failed and that, as I said in my statement later, if we
25 didn't put the fire out, the fire would spread to the

1 entire upper part of the building.

2 Q. That's in your second statement. It was what I was
3 going to take next, so I won't ask you to turn to it but
4 it's at page 322. You said:

5 "My view was that if we did not put the fire out it
6 would have spread to the entire building."

7 A. That's correct, sir.

8 Q. I will take you to 322 because of a separate passage on
9 it. At the bottom of the page, the final answer that we
10 see, three lines from the bottom, says:

11 "I knew that our procedures were not clear on how we
12 would deal with an incident involving a single staircase
13 which is smoke-logged along with smoke-logging
14 throughout the building, fire on a number of floors and
15 a large number of people requiring rescue."

16 Was that the situation in which you found yourself
17 at the time?

18 A. It was. Operational procedures are written so that we
19 have a plan to follow. However, this incident was
20 completely alien to that plan and needed to be dealt
21 with in -- in an individual way which, at the time,
22 I had no experience of.

23 Q. On that same point, on 324, about two-thirds of the way
24 down the page, you finished an answer by saying:

25 "I had not seen a fire like this before."

1 A. That's correct.

2 Q. Finally on this at 327, you gave a long answer that
3 fills most of the page. Just picking out some passages
4 from it, in the third line, you said:

5 "The fire was very difficult to bring under control.
6 There was no way of knowing where the fire had spread to
7 or from, whether from floor to floor or laterally along
8 the floors."

9 Then, skipping on three lines, you said:

10 "The building itself seemed to be allowing the fire
11 to spread unchecked."

12 Then three lines below that:

13 "At times, the building was completely shrouded in
14 smoke due to the wind, which was having an effect on the
15 fire. I believe this caused considerable fire spread at
16 times and fire could be seen at times shooting from the
17 side of the 9th floor corridor window. My own
18 experience as a firefighter was that it was the worst
19 incident I have had to deal with. I feel I asked my
20 firefighters to put themselves at considerable personal
21 risk during the incident to try and effect as many
22 rescues as possible."

23 A. That's correct.

24 Q. Having given that introduction, I'm going to take you
25 back and look at events in more detail. You told us

1 about first being informed of the fire. Potentially,
2 initially, you would have been the monitoring officer,
3 and we have a record of you telephoning control at
4 16.45. That is in the advocates' bundles at page 478.
5 If I could ask you to turn to that.

6 Having asked you to turn to it, it's not the most
7 information-packed document. You'll see that it's
8 a conversation between you and control at 16.45; is that
9 right?

10 A. Yes, sir.

11 Q. You perhaps haven't seen this before?

12 A. No, sir.

13 Q. I don't think it will take you very long to look at it.
14 You were paged. You're E11. You say you're here and
15 control says:

16 "Ah, you're my group manager."

17 You say:

18 "Yes."

19 You're asked:

20 "Have you got the ordering?"

21 You say:

22 "Status 2."

23 Does that mean you're mobile?

24 A. Yes.

25 Q. Control says:

1 "Excellent."

2 And then, a little lower down, you say:

3 "Am I going as GM or FS or what?"

4 Could you just explain what that means?

5 A. I was asking whether I was going as group manager or as
6 a fire safety officer.

7 Q. What would be the difference be and why would you want
8 to know?

9 A. As a group manager I would be expected to possibly
10 perform a command function. As fire safety officer,
11 I would have been expected to perform a specialist role,
12 which would have been to look at the building and see
13 whether or not it complied with fire safety regulations.

14 Q. I think you explained to the jury at the beginning of
15 your evidence that at this time in the job you had
16 recently taken up, you carried out visits to scenes for
17 both of those reasons?

18 A. That's correct, I did.

19 Q. It could have been either, and you wanted to know which
20 it was going to be?

21 A. Yes. One of the problems I had was obviously there was
22 a lot going on at brigade control. A lot of officers --
23 a lot of officers had been paged and I was mindful of
24 the fact that it had been a number of minutes since I'd
25 received my pager message and I wanted to get mobile, so

1 I got sufficient information and then I got -- I got
2 moving.

3 Q. If I take you to page 934. This is very difficult to
4 read, but essentially it shows you arriving at 16.57.
5 I understood you earlier to say that that might not be
6 accurate. Just explain why.

7 A. Yes, again, when I arrived at the scene, there was a lot
8 of radio traffic. It was difficult for me to get
9 through to brigade control to book in attendance, so it
10 may have been that I was there a few minutes before
11 that.

12 Q. Because unlike appliances that we've heard about, which
13 press a button to indicate their arrival, you have to do
14 it over the radio; is that right?

15 A. That's correct.

16 Q. Where did you go first when you arrived?

17 A. I went to the command unit.

18 Q. Was that command unit 4?

19 A. It was.

20 Q. What did you expect to find there?

21 A. I expected to find a command unit crew setting up the
22 command unit ready for it to be used for incident
23 command support.

24 Q. Did you find what you expected to find?

25 A. To my recollection, at the time I first attended the

1 unit, there was no-one on the unit.

2 Q. No-one in it at all?

3 A. No.

4 Q. What evidence was there of it having been set up?

5 A. I could see that obviously there had been some activity
6 and that the command unit crew had been gathering boards
7 of the appliances that were attending the incident.

8 Q. We heard some evidence earlier today -- I'm not sure if
9 you were in court to hear it or not -- about the
10 possibility of asking command unit 4 for messages. Did
11 you hear that evidence earlier?

12 A. I did.

13 Q. Can you assist us with the way in way a command unit
14 could help somebody like you, arriving at the scene as
15 incident commander, whom, as we've seen from your one
16 telephone call up until this point, has limited
17 information given to them personally about what's going
18 on?

19 A. The command unit would gather obviously information
20 about messages sent from the fire ground and also
21 messages received on the incident ground. Obviously
22 they need time to set up. Obviously when I arrived,
23 I didn't know how long they'd been there so I wasn't
24 overly concerned. For all I knew they'd just turned up
25 as well, so I didn't give that too much thought.

1 I assumed that both the command unit crew were involved
2 in supporting the incident commander on the incident
3 ground.

4 Q. So if they had been set up for a long time, such
5 that they were completely set up, what kind of service
6 would you get from them by way of information and
7 messages, ordinarily?

8 A. They were there to support the incident commander. They
9 could obviously send messages to control via main scheme
10 radio, talk to other officers on the telephone if
11 required, contact RMC, which is resource management
12 centre, to ask about various resources --

13 Q. I understand all that. It's not quite the point of my
14 question. The point is: if they'd been there
15 operationally, for example, for half an hour, and you
16 arrive, what service can they provide you to tell you,
17 in a convenient format, what has been happening? What
18 can they give you, for example, in writing, to tell you
19 what's been happening?

20 A. They could have given me a radio log, if they'd been
21 creating a radio log of messages they'd received, and
22 also a log of incident command decisions that were being
23 made on the incident ground.

24 Q. For them to be able to do that, would they have had to
25 be writing those things down by hand or could they pull

1 them up from some kind of computer system?

2 A. They would normally have written them by hand. We do
3 have a command planning system which allows access to
4 different information. However, I am not sure whether
5 or not that system was in place at the time of this
6 incident.

7 Q. Would you normally hope to get some form of initial
8 briefing from the command unit before meeting the
9 incident commander?

10 A. Depending on the scale of the incident and what needed
11 to be done, yes, that's a possibility. During some
12 incidents, the incident commander will remain in the
13 command unit and incident command briefings will be
14 given at that point.

15 Q. I'm just trying to pin down approximately when you took
16 over as incident commander. If we look at page 399 in
17 the advocates' bundles, the box at the top of the page
18 is a typed-up note of a radio communication between
19 command unit 4 and brigade control, which ends by
20 saying:

21 "Charlie uniform 4 from Station Manager Cartwright
22 at Lakanal, Havil Street, SE5. Make pumps 12, aerials
23 two. Over."

24 So my question is: was it you as incident commander
25 who gave that instruction or was it

1 Station Manager Cartwright?

2 A. Yes, sir, that message was initiated by myself as the
3 incident commander.

4 Q. And you would have given the instruction for that
5 message to be sent some time -- we don't know how
6 much -- before it was in fact sent at 17.04.43?

7 A. That's right.

8 Q. So certainly by 17.04.43, you were the incident
9 commander?

10 A. That's correct, sir.

11 Q. You don't need to turn to the particular record, but
12 I can tell you that the records indicate that Mr Chidgey
13 arrived at 17.12.50. Because he would have arrived in
14 a personal vehicle, he, like you, would presumably have
15 had to radio in his arrival?

16 A. Yes, or book in with the command unit.

17 Q. Or book in with the command unit. The command unit in
18 due course, just before 17.20, sent a message saying
19 that Mr Chidgey was now the incident commander. Having
20 given you those times, does that help you at all to
21 narrow down when you think it was that he replaced you
22 as incident commander?

23 A. Well, it would have been shortly before that.

24 Q. Do you recall how long he spoke to you for, or observed
25 and monitored you for, before telling you he was

1 formally taking command?

2 A. I provided him with a situation report and a briefing on
3 the incident, which was quite succinct because obviously
4 there were pressing matters that I wanted to get on
5 with. I confirmed that he was happy with the
6 operational plan that I wanted to put into place. He
7 then informed me that I was going to take the operations
8 commander role, and he then informed me that he was
9 taking command of the incident.

10 Q. Madam, it's 4 o'clock. Is that a convenient moment?

11 THE CORONER: Yes, indeed, thank you very much.

12 Yes, thank you, Mr Freeman, because you're part way
13 through you giving your evidence, there's a strict rule
14 which you must comply with, please. You must not talk
15 to anyone about your evidence or indeed about this
16 matter.

17 A. Yes, madam.

18 THE CORONER: Are you able to return tomorrow to continue,
19 please?

20 A. Yes, madam.

21 THE CORONER: Okay. If you could be here for a 10 o'clock
22 start. Thank you.

23 Members of the jury, see you tomorrow for
24 a 10 o'clock start, thank you. Please go with
25 Mr Graham.

1 (In the absence of the Jury)

2 THE CORONER: Mr Freeman, you're free to go now as well.

3 (The witness withdrew)

4 THE CORONER: Yes, Mr Maxwell-Scott, just before we finish,
5 just looking at the timetable for tomorrow --

6 MR MAXWELL-SCOTT: Exactly.

7 THE CORONER: -- how much longer do you think you might
8 need?

9 MR MAXWELL-SCOTT: No more than 45 minutes.

10 THE CORONER: Right.

11 MR MAXWELL-SCOTT: Half an hour to 45 minutes.

12 THE CORONER: I'm sorry?

13 MR MAXWELL-SCOTT: Half an hour to 45 minutes, I think.

14 THE CORONER: Okay. Mr Hendy, are you able to give me
15 a rough estimate?

16 MR HENDY: Hard to say without knowing how much
17 Mr Maxwell-Scott's going to cover, but no more than
18 30 minutes.

19 THE CORONER: Right. Mr Dowden, Ms Al Tai? Not
20 particularly long.

21 MS AL TAI: I shouldn't imagine very long, madam.

22 THE CORONER: Mr Matthews?

23 MR MATTHEWS: Again, probably no more than five minutes at
24 the most.

25 MR COMPTON: Madam, likely no questions, but if so, no more

1 than five minutes.

2 THE CORONER: Right. Mr Walsh?

3 MR WALSH: Well, if it all goes according to plan, probably

4 five minutes, but absolutely no more than 15.

5 THE CORONER: All right. Well, that's going to take up

6 an hour/hour and a half, isn't it?

7 MR MAXWELL-SCOTT: Yes.

8 THE CORONER: So that's likely to take us to the morning

9 break. Then what next?

10 MR MAXWELL-SCOTT: Station Manager Foster will take some

11 time.

12 THE CORONER: Yes.

13 MR MAXWELL-SCOTT: Having received some views about Crew

14 Manager Niblett and firefighters Geddes and Towler and

15 the extent to which they may be needed for oral

16 evidence, I was going to propose that firefighters

17 Geddes and Towler are told not to attend tomorrow

18 because we're not going to get to them anyway, and it

19 may be that subsequently decisions can be made to the

20 effect that they don't need to be called.

21 THE CORONER: Yes.

22 MR MAXWELL-SCOTT: It's perhaps ambitious, but I would have

23 thought that firefighters Chapman and Baker, and Crew

24 Manager Niblett probably all ought to be here, and may

25 prefer to be here, because there's a chance they may all

1 get on and finish.

2 THE CORONER: All right. Well, there's a chance with a fair
3 wind that that may work. Thank you.

4 All right, 10 o'clock tomorrow, thank you very much.

5 (4.04 pm)

6 (The Court adjourned until 10 o'clock the following day)

7

PAUL CARTWRIGHT (affirmed)2

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